

PREA Facility Audit Report: Final

Name of Facility: Troop K Colchester

Facility Type: Lockups

Date Interim Report Submitted: NA

Date Final Report Submitted: 06/13/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Darla P. O'Connor	Date of Signature: 06/13/2024

AUDITOR INFORMATION	
Auditor name:	OConnor, Darla
Email:	doconnor@strategicjusticesolutions.com
Start Date of On-Site Audit:	04/24/2024
End Date of On-Site Audit:	04/24/2024

FACILITY INFORMATION	
Facility name:	Troop K Colchester
Facility physical address:	15 Old Hartford Road, Colchester, Connecticut - 06415
Facility mailing address:	

Primary Contact

Name:	
Email Address:	
Telephone Number:	

Sheriff/Chief/Director	
Name:	Lt. Adam Litwin
Email Address:	adam.litwin@ct.gov
Telephone Number:	860-465-5400

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

Facility Characteristics	
Designed facility capacity:	4
Current population of facility:	0
Average daily population for the past 12 months:	3
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	18-70
Facility security levels/detainee custody levels:	Temp Holding
Does the facility hold juveniles or youthful detainees?	Yes
Number of staff currently employed at the facility who may have contact with	75

detainees:	
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	
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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:	
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Name:	Colonel Daniel Loughman
Email Address:	Daniel.Loughman@ct.gov
Telephone Number:	

Agency-Wide PREA Coordinator Information			
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Name:	Susan Cecil	Email Address:	Susan.cecil@ct.gov
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Facility AUDIT FINDINGS	
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Summary of Audit Findings	
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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:	2024-04-24
2. End date of the onsite portion of the audit:	2024-04-24

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	<p>Just Detention International was contacted and responded their data base did not reflect any contact from the facility.</p> <p>Backus Hospital was contacted and confirmed SANE personnel are on duty to conduct forensic examination as needed after sexual assault.</p> <p>Greater Hartford Family Advocacy Center was contacted and confirmed they conduct forensic examinations for victims of sexual assault.</p> <p>Connecticut Alliance to End Sexual Violence was contacted and confirmed one of the services they provide is victim advocacy after sexual abuse or assault.</p>

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	4
15. Average daily population for the past 12 months:	3
16. Number of inmate/resident/detainee housing units:	0

<p>17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)</p>
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Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

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

<p>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</p>	<p>0</p>
<p>37. 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:</p>	<p>0</p>
<p>38. 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:</p>	<p>0</p>
<p>39. 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:</p>	<p>0</p>
<p>40. 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:</p>	<p>0</p>

41. 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
42. 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
43. 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
44. 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
45. 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
46. 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
47. 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

<p>48. 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):</p>	<p>There were zero detainees in the facility at the time of the on-site audit.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. 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:</p>	<p>75</p>
<p>50. 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:</p>	<p>0</p>
<p>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>0</p>
<p>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>The facility reports 0 volunteers approved to enter the facility and have contact with detainees. The facility reports 0 contractors approved to enter the facility and have contact with detainees.</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>0</p>

<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Age</p> <p><input type="checkbox"/> Race</p> <p><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input type="checkbox"/> Length of time in the facility</p> <p><input type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> None</p>
<p>If "None," explain:</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>a. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>0</p>

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

<p>59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/detainees.</p> <p><input type="checkbox"/> The inmates/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>

<p>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>

<p>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>

<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>

<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>The detainee count during the on-site audit was 0.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>14</p>
<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p> <input checked="" type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input checked="" type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None </p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>

<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>During the on-site tour, the Auditor had informal, conversational encounters with staff regarding sexual safety, including education, reporting, communication, responses, etc. This information was used to supplement the overall audit information gathering process. A total of fourteen formal random staff interviews were conducted.</p> <p>As a result of the audit notice posting the Auditor did not receive any correspondence from staff.</p> <p>At the beginning of each interview the Auditor made clear to the staff why she was at the facility, what her role was in the PREA process and explained why interviews were needed. The Auditor also discussed the staff's participation as voluntary and while helpful, was not required or mandated in any way. The Auditor then asked the staff member if he/she wanted to participate and if so, could she ask a few questions. The Auditor would then ask the protocol questions. All random staff willingly participated in the interview process. All responses were typed directly onto the protocol form. During the random interviews, no PREA issues were revealed, no other interview protocols were accessed. All random staff responded they were aware of the zero-tolerance policy, they knew how to report an incident, they felt they could accept verbal reports, they knew they had a right to be free from retaliation, and they felt the leadership took sexual safety very seriously.</p> <p>Regarding personal safety, the staff member interviewed stated they felt safe from sexual harassment and sexual abuse.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>15</p>

76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input type="checkbox"/> Other
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
83. Provide any additional comments regarding selecting or interviewing specialized staff.	<p>There were no problems in selecting specialized staff. Specialized staff were selected from the staff roster, who were available during the on-site audit who were also not a staff member interviewed as a random staff member.</p> <p>Using the list of specialized staff provided, the Auditor was able to select individuals for interviews. All specialized staff provided answers were based on the line of questioning on the specific interview protocols for their position and responsibilities.</p>

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

84. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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Was the site review an active, inquiring process that included the following:

<p>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>86. 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)?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>88. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>Troop K is a temporary holding lock-up for the Connecticut State Police. It has a capacity of 4 and houses male and female detainees. It is located at 15A Old Hartford Road, Colchester, CT 06415.</p> <p>The lock-up has 4 single occupancy cells. There is a toilet and a sink in each cell. Camera coverage extends to all cells. The toilet area is blacked out to cover the genital and breast area of the detainees. Male and female detainees are housed separately.</p> <p>The average stay in the lock up is one hour. The remainder of the one building facility is the intake or processing room, a small kitchen area for the employees, employee offices, employee restrooms and storage.</p> <p>The telephone the detainees are allowed to use was tested and found to be in working order.</p> <p>The Auditor was given unimpeded and complete access to all areas of the facility.</p>

Documentation Sampling

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

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?

Yes

No

91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

Personnel and Training Files:

The PAQ represents 75 lockup employees. A review of records revealed all lockup employees had a criminal history check completed in April 2024. All lockup employees had been provided PREA training.

Inmate Records:

The first day of the audit there were 0 inmates. There were 22 previous detainee records reviewed. All detainees had been provided PREA information up intake and had been risk assessed during processing. The average length of stay was one hour.

Sexual Abuse and Sexual Harassment Allegations:

According to the PAQ, the facility reported zero allegations of sexual abuse and sexual harassment allegations in the past twelve months. Consequently, there were zero PREA allegations to review.

Investigation Files:

At the time of the audit, information received regarding the allegations of sexual abuse and sexual harassment during the prior twelve months revealed a total of zero allegations reported. Consequently, there were zero PREA investigation records to review.

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.

92. 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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

94. 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

95. 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.

96. 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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	0
a. Explain why you were unable to review any sexual abuse investigation files:	There were zero allegations of sexual abuse in the past twelve months.

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>a. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>There were zero allegations of sexual harassment in the past twelve months.</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>There were zero allegations of sexual abuse or sexual harassment in the past twelve months.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

- Yes
- No

Non-certified Support Staff

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

- Yes
- No

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?

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

Identify the name of the third-party auditing entity

Diversified Correctional Services

Standards
<p>Auditor Overall Determination Definitions</p> <ul style="list-style-type: none"> • 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)
<p>Auditor Discussion Instructions</p> <p>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.</p>

115.111 Zero tolerance of sexual abuse and sexual harassment
<p>Auditor Overall Determination: Meets Standard</p>
<p>Auditor Discussion</p>
<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 • DESPP Organizational Chart <p><u>INTERVIEWS</u></p> <p>PREA Coordinator (PC) Interview</p> <p>Through the interview process the PREA Coordinator (PC) confirmed having sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all agency facilities. The PREA Coordinator is part of the Accreditation Unit and is directly under the Colonel.</p>

PROVISIONS

Provision (a)

The Pre-Audit Questionnaire (PAQ) indicates the agency/facility has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract. The PAQ indicates 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:

- Clear definitions of prohibited behaviors and approved sanctions for participation in those behaviors.
- Sanctions for those found to have participated in prohibited behaviors.
- A description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of detainees.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p.1, A, 1, states the purpose of this policy is to provide guidance for complying with the Prison Rape Elimination Act of 2003 (PREA) and the implementing regulation that establishes standards to prevent, detect and respond to sexual abuse, harassment and retaliation against detainees or prisoners in Connecticut State Police holding facilities and temporary detention areas.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p.1, B, 1, states the Department of Emergency Services and Public Protection (DESPP), Division of State Police, has zero tolerance toward all forms of sexual abuse and sexual harassment. The Division of State Police will not tolerate retaliation against any person who reports sexual abuse or sexual harassment or who cooperates with a sexual abuse or sexual harassment investigation.

Provision (b)

The PAQ indicates:

- The agency employs or designates an upper-level, agency-wide PREA coordinator.
- The PREA coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all its facilities.
- The position of the PREA coordinator in the agency's organizational structure in the Accreditation Unit.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p.3, D, 1, a-b, indicates DESPP, through the Office of the Deputy Commissioner / Colonel of the Division State Police, shall ensure that:

(a) An upper-level employee is designated as the agency’s PREA Coordinator.

1. Normally, the Commanding Officer of the Bureau of Professional Standards or their designee shall be designated the PREA Coordinator, subject to the discretion of the Colonel.

(b) The PREA Coordinator has sufficient authority to develop, implement, and oversee the department’s effort to comply with the PREA standards in all department lockups.

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 Colonel. The PREA Coordinator is a full-time position dedicated solely to PREA compliance. The PREA Coordinator has sufficient time to manage PREA-related responsibilities.

CONCLUSION

Based upon the review and analysis of the available evidence, the Auditor has determined the agency/facility meets every provision of the standard which addresses zero tolerance of sexual abuse and sexual harassment.

115.112	Contracting with other entities for the confinement of detainees
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator Interview</p> <p>Through the interview process the PC indicated the DESPP does not contract with</p>

	<p>private entities or other government agencies for the confinement of detainees.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>Pre-Audit Questionnaire (PAQ) revealed the law enforcement agency has not entered into or renewed a contract for the confinement of detainees on or after August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>The PAQ indicated the law enforcement agency/facility has not entered contracts with private entities or other government agencies for the confinement of detainees on or after August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>Provision (b)</p> <p>The PAQ indicated the law enforcement agency/facility does not contract with private agencies or other entities for the confinement of detainees.</p> <p><u>CONCLUSION</u></p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the agency/facility meets every provision of the standard which addresses contracting with other entities for the confinement of detainees.</p>
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115.113	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>Document Reviewed</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator</p> <p>Through the interview process the PC indicated the staffing plan is reviewed annually. In calculating adequate staffing levels and in determining the need for video monitoring, the facility/agency takes into consideration all components of the facility's physical plant; the composition of the detainee population; the prevalence of substantiated and unsubstantiated incidents of sexual abuse; and any other</p>

factor that may be relevant.

Facility Head

Through the interview process the facility head indicated random reviews of the staffing levels are routinely conducted to ensure the safety of any detainee that might be in house.

Intermediate-or-Higher Level Facility Staff Interview

Through the interview process the intermediate or higher-level staff acknowledged while the facility rarely has a detainee for over a few hours, when there are detainees in house, intermediate and higher-level staff routinely make rounds of the cells the facility has to ensure the safety of detainees and employees.

Random Staff Interviews

During the interview process as well as informal conversations, staff verbalized when there are detainees in the facility they are visually supervised as a safety precaution.

Provision (a)

The PAQ 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.

The PAQ indicates the average daily number of detainees during the past twelve months was 3 and the average daily number of detainees on which the staffing plan was predicated was 4.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 6, Number 7, a, 1-4, states for each lockup under the control of DESPP, a documented staffing plan shall be developed that provides for adequate levels of staffing, and where applicable, video monitoring to protect detainees against sexual abuse. The following factors shall be 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;
- The prevalence substantiated and unsubstantiated incidents of sexual abuse; and
- Any other relevant factors.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p.

6, Number 7, b, 1, states the commanding officer of any troop or unit that contains one or more lockup facilities shall devise the staffing plan.

The staffing plan shall be sent to the PREA Coordinator for approval. A copy of the staffing plan shall be kept at the lockup facility.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 6, Number 7, c, 1-4, indicates whenever necessary, but no less frequently than once each year, the commanding officer of any troop or unit presiding over any lockup facility shall assess, determine, and document whether adjustments are needed to:

- The staffing plan;
- Prevailing staffing patterns;
- The deployment of video monitoring systems and other monitoring technologies in the lockup;
- The resources the lockup has available to commit to ensure adequate staffing levels

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 6, Number 7, d, indicates 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 justifications to the PREA Coordinator.

Provision (b)

The PAQ indicates that in the past 12 months there have been zero deviations from the staffing plan. However, if there had been a deviation the facility understands the deviation must be documented and would justify the deviation for the record.

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

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date 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 justifications to the PREA Coordinator.

Provision (c)

The PAQ indicates at least once every year the facility will review the staffing plan to see whether adjustments are needed in:

- (a) the staffing plan,
- (b) the prevailing staffing patterns,
- (c) the deployment of monitoring technology, or
- (d) the allocation of the lockup's resources to commit to the staffing plan to ensure compliance with the staffing plan.

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 inmates 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.

The annual review of the staffing plan will include 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.

Provision (d)

The PAQ indicated the facility utilizes a screening process required by § 115.141 to identify vulnerable detainees. Vulnerable detainees are provided with heightened protection.

Connecticut Department of Emergency Services and Public Protection, 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, Section E, Number 2, a, 1-2, a-e, states all detainees shall be screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees.

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

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

CONCLUSION:

Based upon the review and analysis of the available evidence, the Auditor has determined that the agency/facility meets every provision of the standard regarding Supervision and Monitoring

115.114	Juveniles and youthful detainees
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>OBSERVATIONS</u></p> <p>During the on-site tour, the Auditor did not observe any juvenile or youthful detainees.</p> <p><u>INTERVIEWS</u></p> <p>PREA COORDINATOR (PC) INTERVIEW</p> <p>During the interview process the facility head acknowledged that they do not detain juvenile or youthful detainees. Generally speaking juvenile and youthful detainees are turned over to their parents or guardian at the scene of the incident and given a summons.</p> <p>FACILITY HEAD INTERVIEW</p> <p>During the interview process the facility head articulated the lock up does detain juvenile or youthful detainees from time to time. When holding juvenile and youthful detainees, they are detained only long enough for a parent or guardian to pick them up. Usually however, juvenile or youthful offenders are turned over to their parents or guardian at the scene of the incident and given a summons.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates in the past 12 months there were zero juvenile or youthful detainees at the lockup.</p> <p><u>CONCLUSION</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding juvenile and youthful detainees.</p>

115.115	Limits to cross-gender viewing and searches
	<p data-bbox="280 188 981 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 564 300">Auditor Discussion</p> <hr/> <p data-bbox="280 340 596 376"><u>DOCUMENT REVIEW</u></p> <ul data-bbox="352 443 1455 645" style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p data-bbox="280 685 480 721"><u>INTERVIEWS</u></p> <p data-bbox="280 757 497 792">Random Staff</p> <p data-bbox="280 828 1469 1030">During the interview process random staff confirmed they had never conducted a cross-gender cavity/strip search. Further they confirmed they had been trained how to conduct cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner, in the least intrusive manner possible, consistent with security needs.</p> <p data-bbox="280 1066 480 1102"><u>PROVISIONS</u></p> <p data-bbox="280 1137 485 1173">Provision (a)</p> <p data-bbox="280 1209 1477 1330">The PAQ indicates the lockup does not conducts cross-gender strip or cross-gender visual body cavity searches of detainees. Further, In the past 12 months, there were zero cross-gender strip or cross-gender visual body cavity searches of detainees:</p> <p data-bbox="280 1366 1474 1568">Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 5 section 4, a, states Troopers and police officers shall not conduct cross-gender strip searches or cross-gender visual body cavity searches</p> <p data-bbox="280 1603 485 1639">Provision (b)</p> <p data-bbox="280 1675 1455 1756">The PAQ indicates the lockup documents all cross-gender strip searches and cross-gender visual body cavity searches</p> <p data-bbox="280 1792 1474 1948">Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 5, section e4</p> <p data-bbox="280 1984 485 2020">Provision (c)</p>

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 breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Moreover, 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

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 5, section 4, b, states 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.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 5, section 4, b, 1, states 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.

Provision (d)

The PAQ indicates the lockup always refrain from searching or physically examining transgender or intersex detainees for the sole purpose of determining the detainee's genital status. If needed, the lockup determines 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

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 5, section 4, c, states 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.

Provision (e)

The PAQ indicates the agency trains 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. Additionally, the agency trains 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.

	<p><u>CONCLUSION</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding limits to cross-gender viewing and searches.</p>
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<p>115.116</p>	<p>Detainees with disabilities and detainees who are limited English proficient</p>
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>115.116</p> <p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>Random Staff</p> <p>Through the interview process random staff confirmed detainee interpreters had not been utilized in the past twelve months. Further, using detainee interpreters in PREA situations is not allowed.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates 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:</p> <ul style="list-style-type: none"> • Detainees who are deaf or hard of hearing • Detainees who are blind or have low vision • Detainees who have intellectual disabilities • Detainees who have psychiatric disabilities • Detainees who have speech disabilities

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, pp. 5, section 6, a, states 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.

Provision (b)

The PAQ indicates the agency takes reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to detainees who are limited English proficient. These steps include, but are not limited to, providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, pp. 5, section 6, b, states 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:

1. 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.
2. 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.

Provision (c)

The PAQ indicates in the past 12 months, there were zero instances 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 detainee's safety, the performance of first-response duties under § 115.164, or the investigation of the detainee's allegations.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 6, section 6, c, states Troopers and police officers shall not rely on other detainees for assistance with interpreting, reading, or similar activities except in limited

	<p>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.</p> <p><u>CONCLUSION</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding detainees with disabilities and detainees who are limited English proficient.</p>
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115.117	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>Administrative (Human Resources) Staff Interview</p> <p>Through the interview process HR confirmed criminal background records checks are conducted:</p> <ol style="list-style-type: none"> 1. Before an individual is allowed to have contact with a detainee 2. A minimum of every five years 3. Any time an individual is under consideration for a promotion 4. Through the interview process HR confirmed the three questions outlined in this standard area asked: 5. Before an applicant is hired 6. When an individual is a candidate for a promotion. <p>Through the interview process it was also confirmed all employees of the lockup had criminal background records check completed in April 2024.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p>

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 16, section O, 1, a-c, states the department shall not hire or promote anyone who may have contact with detainees, and shall not enlist the services of any contractor who may have contact with detainees who:

- (a) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997);
- (b) Has been convicted of engaging or attempting to engage in sexual activity by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or
- (c) Has been civilly or administratively adjudicated to have engaged in the activity described in subsection O(1)(b) above.

The PAQ also addresses these 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.

Provision (b)

The PAQ indicates the agency considers 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.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 16, O, 2, states 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.

Provision (c)

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

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 16, section O, 3, a-b, states Before hiring new employees who may have contact

with detainees, the department shall:

- a. Perform a criminal background records check; and
- b. 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.

Provision (d)

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

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 16, section O, 4, states the department shall also perform a criminal background record check before enlisting the services of any contractor who may have contact with detainees.

Provision (e)

The PAQ indicates the agency either conducts 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

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 16, section O, 5, states The department shall either conduct criminal background record 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.

Provision (f)

The PAQ indicates 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. 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 any interviews or written self-evaluations conducted as part of reviews of current employees. Finally the agency imposes upon employees a continuing affirmative duty to disclose any such misconduct.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p.

16, section O, 7, states the department shall either conduct criminal background record 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.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 16, section O, 8, states all employees who may have contact with detainees shall have a continuing affirmative duty to disclose any misconduct described in subsection O1 above.

Provision (g)

The PAQ indicates the agency considers material omissions regarding such misconduct, or the provision of materially false information, grounds for termination.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 16, section O, 9, states material omissions regarding such misconduct described in this section, or the provision of materially false information, shall be grounds for termination.

Provision (h)

The PAQ indicates 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.

CONCLUSION

Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding detainees with disabilities and detainees who are limited English proficient.

115.118	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection,

Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024

INTERVIEWS

Facility Head

During the interview process the facility head confirmed the PREA Coordinator would be a stakeholder regarding any updates or renovations. Additionally, before making any modification to the lock-up or the surveillance system, consideration would be given to the effects it would have on PREA expectations.

PROVISIONS

Provision (a)

The PAQ indicates the agency/facility has **NOT** acquired a new facility or made a substantial expansion or modification to existing facilities

Provision (b)

The PAQ indicates the agency has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology.

CONCLUSION

Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding upgrades to facilities and technologies.

115.121	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none">• Pre-Audit Questionnaire and supporting documentation.• Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024• Connecticut Department of Emergency Services and Public Protection, Crime Scene Evidence, 18.2.7, revised November 2010.

INTERVIEWS

PREA Coordinator (PC)

Through the interview process, the PC indicated the agency follows the uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings, as well as protocols and requirements for forensic medical exams.

PROVISIONS

Provision (a)

The PAQ indicates the agency/facility is responsible for conducting administrative and criminal sexual abuse investigations, including detainee-on-detainee sexual abuse or staff sexual misconduct. Additionally when conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol.

Connecticut Department of Emergency Services and Public Protection, Crime Scene Evidence, 18.2.7, revised November 2010, pp 22-23, section w, Sexual Assault Evidence outlines the specific guidelines, responsibilities and expectations of collecting and handling sexual assault evidence. Section w, 1-9 of this document state in addition to collection of semen and blood evidence as discussed in subsections a. and b. of 18.2.7, the following procedures apply for processing evidence of sexual assault:

1. Arrange for the victim to proceed to a hospital or medical facility as soon as possible, instructing the victim to avoid going to the bathroom or cleaning up unless absolutely unavoidable.
2. A Sirchie CT100 Sexual Assault Evidence Kit should be used during the course of any physical examination undertaken.
3. Take custody of the sealed and labeled CT100 Kit and the bag of victim's clothing.
4. Refrigerate, but do not freeze the CT100 Kit and arrange for its transport to the laboratory as soon as possible.
5. Most often an initial evidence submission should involve only the clothing and CT100 Kit.
6. Once a suspect is developed, the laboratory should receive known samples, including hair and blood from the suspect.
7. A sexual assault offender kit is available at the laboratory for evidence collection if a suspect is developed after the incident occurs.
8. Include a summary of the incident including such information as to whether a condom was used or if there is evidence of ejaculation, etc.

Provision (b)

The PAQ indicates the evidence protocol, as appropriate, is 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.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 9, H, c, 1, states when conducting investigations into 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.

Provision (c)

The PAQ indicates the agency offers 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. These examinations are performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) when possible.

If SAFEs or SANEs cannot be made available, other qualified, specially trained medical practitioners perform the examination.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 9, H, d, 1, states 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. 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, other qualified medical practitioners can perform the examination. Efforts to provide SAFEs or SANEs shall be documented in the investigator’s report.

Provision (d)

The PAQ indicates if the detainee is transported for a forensic examination to an outside hospital that offers victim advocacy services, the agency permits the detainee to use such services to the extent available, consistent with security need.

The PAQ indicates there were zero forensic examinations in the last 12 months. However, if there had been any forensic examinations needed, they would have been performed at Greater Hartford Family Advocacy Center, 1000 Asylum Ave, Hartford, CT; 860-714-5864 or Backus Hospital, 326 Washington St, Norwich, CT; 860-823-6389. The victim advocate would have been provided through Connecticut Alliance to End Sexual Violence, 95 Pitkin St, East Hartford, CT; 888-999-5545.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA)

	<p>Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 9, H, d, 2, states 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.</p> <p>Provision (e)</p> <p>N/A - The PAQ indicates the agency itself is responsible for investigating allegations of sexual abuse.</p> <p><u>CONCLUSION</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding evidence protocol and forensic medical examinations.</p>
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115.122	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>Investigative Staff</p> <p>Through the interview process, investigative staff acknowledged all agency/facility are responsible for conducting administrative and criminal investigations of sexual abuse, sexual harassment or staff sexual misconduct. Further, all allegations are investigated.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates the agency ensure all administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment.</p> <p>Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA)</p>

	<p>Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 9, H, 1, a, states the DESPP shall ensure that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p>At the time of the audit, information received regarding the allegations of sexual abuse during the past twelve months revealed a total of zero sexual abuse allegations reported.</p> <p>At the time of the audit, information received regarding allegations of sexual harassment during the past twelve months revealed a total of zero sexual harassment allegation reported.</p> <p>At the time of the audit, information received regarding allegations of sexual harassment during the past twelve months revealed a total of zero administrative or criminal investigations regarding sexual abuse, sexual harassment or staff sexual misconduct.</p> <p>Provision (b)</p> <p>N/A- The agency is responsible for conducting administrative and criminal investigations of sexual abuse and sexual harassment.</p> <p>Provision (c)</p> <p>Auditors are not required to audit this provision</p> <p>Provision (d)</p> <p>Auditors are not required to audit this provision.</p> <p><u>CONCLUSION</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding policies to ensure referrals of allegations for investigations.</p>
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115.131	Employee and volunteer training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA)

INTERVIEWS

PREA Coordinator (PC) Interview

Through the interview process, the PC indicated PREA training for staff is a priority. It is an ongoing process.

Staff Interviews

Through the interview process staff members acknowledged receiving PREA training.

PROVISIONS

Provision (a)

The PAQ indicates 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:

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

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 15, N, 1, a-f. states 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) The department's zero-tolerance policy and detainees' right to be free from sexual abuse and sexual harassment;
- (b) The dynamics of sexual abuse and sexual harassment in confinement settings, including which detainees are most vulnerable in lockup settings;
- (c) The right of detainees and employees to be free from retaliation for

- reporting sexual abuse or sexual harassment;
- (d) How to detect and respond to signs of threatened and actual sexual abuse;
- (e) How to communicate effectively and professionally with all detainees; and
- (f) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

Provision (b)

The PAQ indicates all current employees and volunteers who may have contact with detainees have received the training outlined in this standard. 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.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 15, N, 2-3, a, states all existing employees who may have contact with lockup detainees shall be trained within one year of the effective date of the PREA standards and shall provide refresher information annually to ensure that such employees know the department's current detainee sexual abuse and sexual harassment policies and procedures. 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 she understands the training / refresher information they have received. The department shall maintain documentation confirming that such training / refresher information has been received, and such records shall be made available to the PREA Coordinator.

Provision (c)

The PAQ indicates the agency documents, through employee signature or electronic verification, that employees understand the training they have received

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 15, N, 3, states 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 she understands the training / refresher information they have received.

CONCLUSION

Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding employee and volunteer training.

115.132	Detainee, contractor, and inmate worker notification of the agency's zero-tolerance policy
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>Random Staff</p> <p>Through the interview process random staff stated that anyone who enters the lockup and could have contact with a detainee is made aware of the zero-tolerance policy.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates during the intake process, employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment.</p> <p>Connecticut Department of Emergency Services and Public Protection, 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, section E, 1, a, 1-2, states 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 notifies all detainees of the following:</p> <ul style="list-style-type: none"> • The department's zero-tolerance policy for all forms of detainee sexual abuse and sexual harassment; and • The availability of multiple ways for detainees to privately report sexual abuse and sexual harassment, retaliation by other detainees or staff for reporting sexual abuse or sexual harassment, including the ability to contact a non-affiliated entity to make such reports. <p>Provision (b)</p> <p>The PAQ indicates contractors and any inmates who work in the facility is informed of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment upon entering the facility.</p>

	<p>Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 15, N, 4 states any contractors or (DOC) inmates assigned to work in the lockup and who may have contact with lockup detainees shall be informed of the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment.</p> <p><u>CONCLUSION</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding detainee, contractor, and inmate worker notification of the agency’s zero tolerance policy.</p>
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115.134	Specialized training: Investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire (PAQ) and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>Investigative Staff Interview</p> <p>Through the interview process the investigative staff reported all investigators have completed specialized training. Through the interview process and a review of training documents by the Auditor, it has been confirmed each of the assigned investigators have attended the required training and met all training requirements</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates in addition to the general training provided to all employees and volunteers the agency ensures that its investigators have received training in conducting such investigations in confinement settings.</p> <p>Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p.</p>

15, N, 6, states in addition to the general training requirements of all employees, the department shall ensure that department investigators that conduct detainee sexual abuse investigations have received training in conducting such investigations in confinement settings.

Provision (b)

The PAQ indicates the investigator 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

Connecticut Department of Emergency Services and Public Protection, Administration and Operations 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:

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

Provision (c)

The PAQ indicates 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 (9 Modules).

There are 50 investigators currently employed who have completed the required training.

Provision (d)

Auditors are not required to audit this provision.

CONCLUSION

Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets the standard regarding Specialized Training: Investigators.

115.141

Screening for risk of victimization and abusiveness

Auditor Overall Determination: Meets Standard

Auditor Discussion

DOCUMENT REVIEW

- Pre-Audit Questionnaire and supporting documentation.
- Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024

INTERVIEWS

Risk Screening Staff Interview

During the interview process the risk screening staff acknowledged that the holding cells are one person cells. When appropriate and necessary, staff take steps to mitigate danger to the detainee.

Random Staff Interview

During the interview process random staff indicated that detainees participate in a risk assessment upon arrival prior to being placed in a cell.

PROVISIONS

Provision (a)

The PAQ indicates the facility is used to house detainees overnight. However, in the past 12 months zero detainees have been held overnight.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 5, E, 3, states the Prison Rape Elimination Act (PREA) Zero Tolerance Notice and Risk Assessment Screening shall be documented by completing the PREA Notice and Screening form DESPP-0103-C. The trooper or police officer conducting the screening shall sign the bottom of the form.

Provision (b)

The PAQ indicates all detainees are screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees.

Connecticut Department of Emergency Services and Public Protection, 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, E, 2, a, states all detainees shall be screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees.

Provision (c)

The PAQ indicates staff always ask the detainee about his or her own perception of vulnerability.

Connecticut Department of Emergency Services and Public Protection, 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, E, 2, a, 1, states troopers and police officers shall ask the detainee about his or her own perception of vulnerability.

Provision (d)

The PAQ indicates the screening instrument ask the following questions:

- 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

Connecticut Department of Emergency Services and Public Protection, 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, E, 2, 1, a-e, states the following criteria shall also be considered, to the extent that the information is available:

- [a] Whether the detainee has a mental, physical, or developmental disability.
- [b] The age of the detainee.
- [c] The physical build and appearance of the detainee.
- [d] Whether the detainee has previously been incarcerated.
- [e] The nature of the detainee’s alleged offense and criminal history.

CONCLUSION:

Based upon the review and analysis of the available evidence, the Auditor has determined that the agency/facility meets every provision of the standard which addresses policies regarding screening for risk of victimization and abusiveness.

115.151	Detainee reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<u>DOCUMENT REVIEW</u>

- Pre-Audit Questionnaire (PAQ) and supporting documentation.
- Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024

INTERVIEWS

PREA Coordinator (PC)

Throughout the interview process the PC reported inmates could report abuse or harassment to a public or private entity. The PC stated inmates could report to the Connecticut Alliance to End Sexual Violence

.Random Staff

Throughout the interview process the staff indicated they would accept a report or allegation from the inmate and provide it to their supervisor for further direction. They each also reported inmates can report in diverse ways which includes telling a staff member, calling the PREA telephone number posted throughout the facility, or telling a family member. Staff interviewed stated inmates can privately report sexual abuse or sexual harassment as well, by contacting the Connecticut Alliance to End Sexual Violence

Through the interview process, staff indicated there are several methods for staff to privately report sexual abuse of inmates were identified. All staff indicated they may choose to make a private report to their supervisor, the facility head, PCM, PC, or Connecticut Alliance to End Sexual Violence.

PROVISIONS

Provision (a)

The PAQ indicates the agency provides 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.
- Staff neglect or violation of responsibilities that may have contributed to such incidents.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 7, F, 1, a, 1-3, states detainees may report in multiple ways the following:

- Sexual abuse and/or sexual harassment that occurred within a department

lockup.

- 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.

Provision (b)

The PAQ indicates the agency provides at least one way for detainees to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency. This entity can receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials. This entity can allow the detainee to remain anonymous upon request.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 p. 7, F, 1, b, 2, states detainees shall be informed of at least one way to report sexual abuse or sexual harassment to public or private entity or office that 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.

Provision (c)

The PAQ indicates staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. Staff members promptly document any verbal reports of sexual abuse and sexual harassment.

Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 7, F, 1, b, 1-2, states staff shall accept reports made verbally, in writing, and anonymously.

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

Detainees shall be informed of at least one way to report sexual abuse or sexual harassment to public or private entity or office that 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.

Provision (d)

The PAQ indicates the agency provides a method for staff to privately report sexual

	<p>abuse and sexual harassment of detainees.</p> <p><u>CONCLUSION:</u></p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the agency/facility meets every provision of the standard which addresses policies regarding Detainee Reporting.</p>
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115.154	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire (PAQ) and supporting documentation. • Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 • Agency PREA Unit website https://portal.ct.gov/despp/division-of-state-police/prea-unit <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>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 https://portal.ct.gov/despp/division-of-state-police/prea-unit</p> <p>Connecticut Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, pp. 7-8, F, 2, a, 1, states all reports of sexual abuse and sexual harassment of detainees that are made from third parties shall be received and investigated. This includes anonymous reports.</p> <p><u>CONCLUSION:</u></p> <p>Based upon the review and analysis of the available evidence, the Auditor has determined that the agency/facility meets every provision of the standard which addresses policies regarding Third Party Reporting</p>

115.161	Staff and agency reporting duties
	<p data-bbox="280 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 266 564 300">Auditor Discussion</p> <hr/> <p data-bbox="280 344 639 378"><u>DOCUMENT REVIEWED</u></p> <ul data-bbox="352 445 1453 647" style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p data-bbox="280 692 480 725"><u>INTERVIEWS</u></p> <p data-bbox="280 770 799 804">PREA Coordinator (PC) Interview</p> <p data-bbox="280 837 1422 904">Through the interview process, the PC confirmed allegations of sexual abuse and sexual harassment are reported to the PCM and agency/facility investigators.</p> <p data-bbox="280 949 647 983">Facility Head Interview</p> <p data-bbox="280 1016 1461 1128">Through the interview process the facility head acknowledged any allegation would be reported to the appropriate agency, as required by law, as well as the PC and agency/facility investigators.</p> <p data-bbox="280 1173 533 1207">Staff Interviews</p> <p data-bbox="280 1240 1469 1487">During interviews with staff, each were able to explain how they would immediately report an allegation of sexual abuse in a manner compliant with policy. Moreover, each verbalized information received from a victim should remain confidential, with them only notifying staff that needed to know, i.e., their supervisor, medical staff, etc. All staff indicated PREA related allegations and reports go to the PCM, who then notifies the investigative staff.</p> <p data-bbox="280 1532 480 1565"><u>PROVISIONS</u></p> <p data-bbox="280 1599 485 1632">Provision (a)</p> <p data-bbox="280 1666 1445 1744">The PAQ indicates the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding:</p> <ul data-bbox="352 1812 1477 2058" style="list-style-type: none"> • An incident of sexual abuse • An incident of sexual harassment • An incident of retaliation • Any staff neglect that contributed to sexual abuse, sexual harassment or retaliation • Any staff violation of responsibilities that contributed to sexual abuse, sexual

harassment or retaliation

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 7, F, c, 1-3, states all employees shall immediately report to the on-duty shift supervisor:

1. Any knowledge, suspicion, or information regarding an incident of detainee sexual abuse and/or sexual harassment that occurred within a department lockup;
2. 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; and
3. Any employee neglect or violation of responsibilities that may have contributed to an incident of retaliation.

Provision (b)

The PAQ indicates apart from reporting to designated supervisors or officials, staff are prohibited 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

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 7, F, e, states troopers, police officers, and any 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

Provision (c)

The PAQ indicates if the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency reports the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 7, F, d, 1-3, states in addition to the requirements of this section, supervisors receiving such reports shall consider and comply with any other statutory mandatory reporting requirements of vulnerable populations, including:

1. Neglected or abused children (Reference A&O § 19.05.06);
2. Elderly persons aged sixty (60) or older (Reference A&O §19.03.07); and
3. 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).

Provision (d)

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

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, pp. 7-8, F, 2, a, states all reports of sexual abuse and sexual harassment of detainees that are made from third parties shall be received and investigated. Including anonymous reports.

CONCLUSIONS:

Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding staff and agency reporting duties.

115.162	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEWED</u></p> <ul style="list-style-type: none">• Pre-Audit Questionnaire and supporting documentation.• Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator (PC) Interview</p> <p>Through the interview process the PC acknowledged the protection and the safekeeping of the victim is the primary focus in allegations of sexual abuse. The PC indicated, if necessary, the victim would be moved.</p> <p>Facility Head</p> <p>Through the interview process the facility head acknowledged any time an allegation is made immediate action is taken to protect the victim (detainee). The victim might be moved to another area of the facility or to another facility all</p>

together, depending on what was needed to protect the victim.

Staff Interviews

Through the interview process staff echoed the facility heads sentiments.

PROVISIONS

Provision (a)

The PAQ indicates when the agency/facility learns that a detainee is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the detainee. In the past twelve months this has happened zero times.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 1, B, 2, states the Division of State Police will take immediate action to protect detainees and prisoners who are reasonably believed to be subject to a substantial risk of imminent sexual abuse.

CONCLUSIONS:

Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding agency protection duties.

115.163	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none">• Pre-Audit Questionnaire and supporting documentation.• Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p>INTERVIEWS</p> <p>PREA Coordinator (PC)</p> <p>Through the interview process the PC confirmed any notification received regarding a PREA incident, whether it be sexual abuse or sexual harassment or staff sexual misconduct that occurred within any facility will be investigated immediately.</p>

Through the interview process the PC confirmed any notification received regarding a PREA incident, whether it be sexual abuse or sexual harassment or staff sexual misconduct that occurred within any facility will be investigated immediately.

Through the interview process the PC indicated once an allegation of sexual abuse or sexual harassment is received from another agency, it is immediately assigned to an investigator to conduct an investigation.

PROVISIONS

Provision (a)

The PAQ indicates upon receiving an allegation that a detainee was sexually abused while confined at another facility, the head of the facility that received the allegation notifies the head of the facility or appropriate office of the agency where the alleged abuse occurred within 72 hours of becoming aware of the allegation. This has happened zero times in the past twelve months.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 8, F, 4, a, 1-2, states upon any trooper or police officer in the course of 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:

1. The Commanding Officer of the Troop area having operational responsibility for the facility in question; and
2. The department PREA Coordinator.

Provision (b)

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

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 8, F, 4, b, 1, states 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. Such notification shall be provided as soon as possible, but no later than seventy-two hours after receiving the allegation; and

Provision (c)

	<p>The PAQ indicates the facility head will document this notification.</p> <p>Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 8, F, 4, b, 2, states such notification shall be documented using a method prescribed by the PREA Coordinator.</p> <p>Provision (d)</p> <p>The PAQ indicates the facility head or agency office that receives such notification ensures the allegation is investigated in accordance with these standards. This has happened zero times in the past twelve months.</p> <p>Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, 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 shall be created.</p> <p><u>CONCLUSIONS:</u></p> <p>Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding reporting to other confinement facilities.</p>
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115.164	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>Facility Head Interview</p> <p>Through the interview process, the facility head acknowledged first responder staff have been trained in the PREA process, and continuing training is conducted to</p>

ensure competency and compliance.

Law Enforcement Staff - First Responders

Through the interview process, law enforcement staff first responders confirmed training in the PREA process. Law enforcement first responder staff were able to articulate to the Auditor, step-by-step, how to respond to a PREA incident. All staff were aware of the mandate to separate the perpetrator from the victim, preserve physical evidence, as well as the area the incident occurred, seek medical aid, as needed, and report the incident.

Non-Law Enforcement Security - First Responders

Through the interview process, non-law enforcement staff indicated they are not allowed to be in the lock up without the presence of law enforcement staff.

PROVISIONS

Provision (a)

The PAQ indicates 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:

- Separate the alleged victim and abuser
- Preserve and protect any crime scene until appropriate steps can be taken to collect any 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, if the abuse occurred within a time period that still allows for the collection of physical evidence
- Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence.

There were zero allegations of sexual abuse, sexual harassment or sexual misconduct in the past twelve months.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, pp. 8-9, G, 1, a-d, 1-8, states

(1) Upon learning of an allegation that a detainee was sexually abused, the first trooper or police officer to respond to such report shall:

- (a) Separate the alleged victim and abuser;
- (b) Take immediate action to protect the detainee from substantial risk of imminent sexual abuse;
 - 1. Contact a supervisor to determine further actions to protect the detainee
- (c) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;
- (d) 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:
 - 1. Washing;
 - 2. Brushing teeth;
 - 3. Changing clothes;
 - 4. Urinating;
 - 5. Defecating;
 - 6. Smoking;
 - 7. Drinking; or
 - 8. Eating

Provision (b)

The PAQ indicates non law enforcement staff are not allowed to be in the lock up without law enforcement staff accompaniment.

The facility staffing plan indicates civilian (non-sworn) staff, volunteers, or contractors shall not enter the processing/lock-up area when there are any detainees present. The civilian staff, volunteers, and contractors shall have no 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.

CONCLUSIONS:

Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding staff first responder duties.

115.165	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

DOCUMENT REVIEW

- Pre-Audit Questionnaire and supporting documentation.
- Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024

INTERVIEWS

PREA Coordinator (PC) Interview

During the interview process the PC acknowledged one the PC responsibilities is to develop a written coordinated response plan for staff first responders, medical and mental health practitioners, investigators and department leadership to an incident of sexual abuse.

PROVISIONS

Provision (a)

The PAQ indicates the agency has 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. If a victim is transferred from the lockup to a jail, prison, or medical facility, 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 service

Department of Emergency Services and Public Protection (DESPP), 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.

Provision (b)

The PAQ indicates if a victim is transferred from the lockup to a jail, prison, or medical facility, the agency, as permitted by law, informs the receiving facility of the incident unless the victim requests otherwise. If a victim is transferred from the lockup to a jail, prison, or medical facility, the agency, as permitted by law, informs the receiving facility of the victim's potential need for medical or social services unless the victim requests otherwise.

CONCLUSIONS:

Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding coordinated response.

115.166	Preservation of ability to protect detainees from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator (PC)</p> <p>Through the interview process the PC acknowledged the agency and any other government entities responsible for collective bargaining on the agency’s behalf are prohibited from entering or renewing any collective bargaining agreement or other agreement that limits the agency’s ability to remove alleged staff sexual abusers from contact with any inmate pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates neither the agency nor any other governmental entities is responsible for collective bargaining on the agency’s behalf. There are no agreements in place that limit the agency’s authority to remove alleged staff sexual abusers from contact with inmates. There have been no new collective bargaining agreements since August 20, 2012.</p> <p>Provision (b)</p> <p>Auditors are not required to audit this provision</p> <p><u>CONCLUSIONS:</u></p> <p>Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding preservation of ability to protect detainees from contact with abusers.</p>

115.167	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard

Auditor Discussion

DOCUMENT REVIEW

- Pre-Audit Questionnaire and supporting documentation.
- Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024

INTERVIEWS

Facility Head

Through the interview process the facility head indicated the department monitors the conduct and treatment of detainees/staff who have reported sexual abuse and of detainees who were reported to have suffered sexual abuse. There are multiple measures used to protect inmates and staff from retaliation. These measures include considering 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 fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigators. Commanders shall act promptly to remedy any such retaliation.

PROVISIONS

Provision (a)

The PAQ indicates the agency has 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. The agency designated which staff members or departments are charged with monitoring retaliation

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, J, 1, states 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.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, J, 2, a-b, states 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:

- (a) Removing alleged staff or detainee abusers from contact with victims.
- (b) Providing emotional support services, whether through existing employee support programs or not, for staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigators.

Provision (b)

The PAQ indicates the agency employs 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 investigators.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, J, 2, a-b, states 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:

- (a) Removing alleged staff or detainee abusers from contact with victims.
- (b) Providing emotional support services, whether through existing employee support programs or not, for staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigators.

Provision (c)

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 who were reported to have suffered sexual abuse
- Act promptly to remedy any such retaliation

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, J, 3, states the department shall 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. Commanders shall act promptly to remedy any such retaliation.

Provision (d)

	<p>The PAQ indicates any other individual who cooperates with an investigation expresses a fear of retaliation, the agency take appropriate measures to protect that individual against retaliation.</p> <p>Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, J, 4, states If any other individual who cooperates with an investigation expresses a fear of retaliation, the department shall take appropriate measures to protect that individual against retaliation.</p> <p>Provision (e)</p> <p>Auditors are not required to audit this provision.</p> <p><u>CONCLUSIONS:</u></p> <p>Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding agency protection against retaliation.</p>
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115.171	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire (PAQ) and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS:</u></p> <p>Investigative Staff Interview</p> <p>During the interview process the investigator indicated</p> <ol style="list-style-type: none"> 1. Investigations begin immediately following notification of the incident. 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. 2. Attendance is required for mandatory training sessions for specialized training. 3. All investigations generally follow the same investigative format. Interviews

are 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.

4. If it is an alleged sexual assault or sexual abuse incident, the victim is met at the dedicated SAFE/SANE location if applicable.
5. The investigator collects and secures all evidence unless the SANE team collects it.
6. Investigative staff are trained in evidence collection.
7. When the evidence appears to support a criminal act that has been committed, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.
8. If the case appears to be criminal, Miranda warnings are given to the person(s)
9. The credibility of anyone involved in the investigation is determined through the investigative process.
10. Everyone is treated as credible and truthful unless the investigation proves otherwise.
11. Polygraph is not used in the investigative process of PREA cases.
12. The evidence is followed as the investigation unfolds.
13. In following the evidence, an attempt is made to determine if staff actions or failure to act contributed to the allegation.
14. All findings are summarized in the investigative report.
15. If the investigation uncovers evidence that a crime has been committed, the results of the investigation are turned over to an office who has the authority to prosecute for review and consideration.
16. If a principle (victim or abuser) is released or terminated from the agency, it in no way alters the investigation.
17. The investigation always continues to its natural end regardless of the employment or residence of the individuals involved.

Provision (a)

The PAQ indicates the agency/facility has a policy related to criminal and administrative investigations.

The PAQ indicates the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, and it does so promptly, thoroughly, and objectively. The agency conducts investigations into all allegations, including third party and anonymous reports.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 9, H, 1, a, states DESPP shall ensure that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Provision (b)

The PAQ indicates where sexual abuse is alleged, the agency uses investigators who have received specialized training in sexual abuse investigations

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 9, H, 1, b, states 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.

Provision (c)

The PAQ indicates investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data. Investigators interview alleged victims, suspected perpetrators, and witnesses. Investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 9, 1, c, states investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.

Provision (d)

The PAQ indicates the quality of evidence appears to support criminal prosecution, the agency conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 10, H, 1, f, states when the quality of evidence appears to support criminal prosecution, the department shall conduct compelled administrative interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

Provision (e)

PAQ indicates 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. The agency investigates 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

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 10, H, 1, e, 1, states the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as detainee or staff. 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.

Provision (f)

The PAQ indicates administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse. Administrative investigations documented in written reports include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 10, H, I, 1, states administrative investigations shall also include an effort to determine whether staff actions or failures to act contributed to the abuse.

Provision (g)

The PAQ indicates criminal investigations documented in a written report that contain a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

The PAQ indicates in the past twelve months there were zero substantiated allegations of conduct that appear to be criminal that were referred for prosecution.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 10, H, 1, h, states criminal investigations shall 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.

See provision (d) for more information on criminal investigations.

Provision (h)

The PAQ indicates all substantiated allegations of conduct that appear to be criminal are referred for prosecution

Per the PAQ, in the past twelve months there were zero criminal cases referred for prosecution.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 10, H, 1, g, states substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.

Provision (i)

The PAQ indicates the agency retains all written reports referenced in 115.171(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 10, H, 2, a, states DESPP shall follow the established retention schedule approved by the Connecticut State Library for sex crime case investigations

Provision (j)

The PAQ indicates the agency ensures that the departure of an alleged abuser or victim from employment or control of the lockup or agency does not provide a basis for terminating an investigation.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 10, H, 1, e, j, states the departure of the alleged abuser or victim from employment with the department or control of the agency shall not provide a basis for terminating an investigation.

Provision (k)

Auditors are not required to audit this provision.

Provision (l)

The PAQ indicates in the unforeseen event of an outside agency investigating sexual abuse, the agency will cooperate with outside investigators and endeavors to remain informed about the progress of the investigation.

CONCLUSIONS:

Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding criminal and administrative agency investigations.

	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <hr/> <p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS:</u></p> <p>Investigative Staff</p> <p>During the interview process the investigator confirmed the standard for an allegation to be substantiated is a preponderance of the evidence.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates 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</p> <p>Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 10, H, 3, states DESPP shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p><u>CONCLUSIONS:</u></p> <p>Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding evidentiary standard for administrative investigations.</p>
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115.176	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<u>DOCUMENT REVIEW</u>

- Pre-Audit Questionnaire and supporting documentation.
- Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024

INTERVIEWS:

PREA Coordinator (PC) Interview

Through the interview process the PC acknowledged all staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment or sexual misconduct policies. According to the PC in the past twelve months, there were zero staff who have violated agency sexual abuse or sexual harassment or sexual misconduct policies. Further, the PC confirmed the presumptive disciplinary sanction for staff who have engaged in sexual abuse is termination.

Facility Head Interview

Through the interview process the facility head confirmed during the previous twelve months there had not been any terminations or resignations of staff for violation of the agency's sexual abuse or sexual harassment or sexual misconduct policies.

PROVISIONS

Provision (a)

The PAQ indicates staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, K, 1, a, states DESPP employees shall be subject to disciplinary sanctions up to and including termination for violating agency detainee sexual abuse or detainee sexual harassment policies.

Provision (b)

The PAQ indicates termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. There have been zero employee terminations, or resignations prior to terminations, in the past twelve months.

See provision (a).

Provision (c)

The PAQ indicates disciplinary sanctions for violations of agency policies relating to

sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, K, 1, b, states disciplinary sanctions for violations of DESPP policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offense by other staff with similar histories.

Provision (d)

The PAQ indicates all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to law enforcement agencies, unless the activity was clearly not criminal. They are also reported to any relevant licensing body.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, K, 1, c, states all terminations for violation of this policy, or resignations by staff who would have been terminated if not for their resignation, shall be reported to any relevant licensing bodies.

CONCLUSIONS:

Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding disciplinary action for staff.

115.177	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024

INTERVIEWS:

PREA Coordinator (PC) Interview

During the interview process the PC indicated during the previous twelve months there had been zero contractors or volunteers reported to law enforcement agencies and/or relevant licensing bodies for engaging in sexual abuse of inmates. Further there had been zero volunteers or contractors reported to law enforcement for engaging in sexual abuse of inmates.

Facility Head Interview

Through the interview process the facility head confirmed during the previous twelve months there had been zero contractors or volunteers reported to law enforcement agencies and/or relevant licensing bodies for engaging in sexual abuse of inmates. Further there had been zero volunteers or contractors reported to law enforcement for engaging in sexual abuse of inmates.

PROVISIONS

Provision (a)

The PAQ indicates any contractor or volunteer who engages in sexual abuse is:

1. Prohibited from contact with detainees.
2. Reported to Law Enforcement, unless the activity was not clearly criminal
3. Reported to Relevant licensing bodies.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, K, 2, a, states any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with detainees, a criminal investigation by the agency shall be initiated (unless the activity was clearly not criminal), and the sexual abuse shall be reported to any relevant licensing bodies.

Provision (b)

The PAQ indicates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, the facility takes appropriate remedial measures, and considers whether to prohibit further contact with detainees.

Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, K, 2, b, states the department shall take appropriate remedial measures and shall consider whether to prohibit further contact with detainees, in the case of any other violation of this policy by a contractor or volunteer.

	<p>CONCLUSIONS:</p> <p>Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding corrective action for contractors and volunteers.</p>
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115.178	Referral for prosecution for detainee-on-detainee sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS:</u></p> <p>PREA Coordinator (PC) Interview</p> <p>Through the interview process the PC indicated there were zero administrative findings of inmate-on-inmate sexual abuse that occurred at the facility in the past twelve months. Likewise, there were zero criminal findings of guilt for inmate-on-inmate sexual abuse that occurred at the facility.</p> <p>Through the interview process the PC indicated sexual activity between detainees is prohibited.</p> <p>Through the interview process, the PC acknowledged they only discipline a detainee for sexual contact with staff after finding that the staff member did not consent to such contact. Additionally, it is prohibited to take disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred,</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates when there is probable cause to believe that a detainee sexually abused another detainee in a lockup, the agency refers the matter to the appropriate prosecuting authority.</p> <p>Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and</p>

	<p>Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, K, 3, a, 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.</p> <p>Provision (b)</p> <p>N/A - The agency/facility is responsible for administrative and criminal investigations.</p> <p>Provision (c)</p> <p>N/A - The agency/facility is responsible for administrative and criminal investigations.</p> <p><u>CONCLUSIONS:</u></p> <p>Based upon the review and analysis of all available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding referral for prosecution for detainee-on-detainee sexual abuse.</p>
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115.182	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator (PC) Interview</p> <p>Through the interview process the PC acknowledged that upon a detainee arriving at the hospital after a report of sexual assault a SANE nurse will be notified to examine the victim and a local victim advocate will be notified to accompany the detainee. Medical treatment is provided immediately and is at no cost to the detainee. Information about and access to emergency contraception and sexually transmitted diseases prophylaxis, is offered in accordance with professionally accepted standards of care as medically appropriate.</p> <p><u>PROVISIONS</u></p>

	<p>Provision (a)</p> <p>The PAQ indicates detainee victims of sexual abuse in lockups receive timely, unimpeded access to emergency medical treatment. Emergency medical treatment is provided at Backus Hospital, 326 Washington St, Norwich, CT; 860-823-6389</p> <p>Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, I, 3, states Victims shall have timely, unimpeded access to emergency medical treatment.</p> <p>Provision (b)</p> <p>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.</p> <p>Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 11, I, 3, a, states treatment services shall 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.</p> <p><u>CONCLUSION:</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding access to emergency medical and mental health services.</p>
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115.186	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator (PC) Interview</p>

Through the interview process the PC acknowledged the responsibility to prepare a report of the review teams findings, including but not necessarily limited to determinations made and any recommendations for improvement, and submit such report to the commanding officer of the lockup and to the Office of the Colonel.

Facility Head Interview

During the interview process the facility head articulated an understanding of the composition of the review team. The facility head committed to consideration and incorporation of any e recommendations from team members.

Incident Review Team (IRT) Interview

During the interview process, a member of the sexual abuse incident review team indicated the team considers all criteria listed in this standard, as required by PREA policy and acknowledged the team meets no later than thirty days after the closing of the investigation. The Sexual Abuse Incident Review report is submitted to the facility head and the PC.

PROVISIONS

Provision (a)

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. There have been zero criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only “unfounded” incidents.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 12, L, 1, a, states DESPP shall 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.

Provision (b)

The PAQ indicates sexual abuse incident reviews ordinarily occur within 30 days of the conclusion of the investigation. There have been zero 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” incident

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 12, L, 1, b, states sexual abuse incident reviews shall ordinarily occur within 30 days of the conclusion of the investigation.

Provision (c)

The PAQ indicates the review team includes upper-level management officials, with input from line supervisors and investigators.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 12, L, 1, c, states the review team shall include the commanding officer of each district, commanding officer of the Training Academy or designee, and the PREA Coordinator. Input from line supervisors and investigating troopers shall be allowed.

Provision (d)

The PAQ indicates the review teams does 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; gang affiliation; or was motivated or otherwise caused by other group dynamics at the lockup
- Examines 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
- Prepare a report of its findings, including but not necessarily limited to determinations made and any recommendations for improvement and submit such report to the lockup head and agency PREA coordinator

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 12, L, 1, d, 1-6, states The review team shall:

1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
2. 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;
3. Examine the area in the lockup where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
4. Assess the adequacy of staffing levels in that area during different shifts;
5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and

6. The PREA Coordinator shall prepare a report of the review teams findings, including but not necessarily limited to determinations made pursuant to criteria reviewed above, and any recommendations for improvement, and submit such report to the commanding officer of the lockup and to the Office of the Colonel.

Provision (e)

The PAQ indicates the lockup implements the sexual abuse incident review teams recommendations for improvement, or document its reasons for not doing so.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 12, L, 1, e, states the recommendations for improvement shall be implemented at the lockup facility, or the reasons for not doing so shall 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.

CONCLUSION:

Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding sexual abuse incident reviews.

115.187	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator (PC) Interview</p> <p>Through the interview process the PC indicated upon request, the agency would provide all such data from the previous calendar year to the Department of Justice no later than June 30th. The PC further indicated the agency maintains, reviews,</p>

and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

PROVISIONS

Provision (a)

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.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 2, a, states the PREA Coordinator shall ensure that accurate, uniform data for every allegation of sexual abuse at lockups under the direct control of the Division of State Police is collected.

Provision (b)

The PAQ indicates the agency aggregates incident-based sexual abuse data at least annually.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 2, a, 1, states 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.

Provision (c)

The PAQ indicates the incident-based data includes 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.

See provision (b) for policy details.

Provision (d)

The PAQ indicates the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews

Provision (e)

N/A - The agency does not contract for the confinement of its detainees.

Provision (f)

	<p>N/A - The DOJ has not requested agency data.</p> <p>Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 2, a, 1, a, states upon request, DESPP shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p><u>CONCLUSION:</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding data collection.</p>
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115.188	Data review for corrective action
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator (PC) Interview</p> <p>Through the interview process, the PC indicated the agency reviews data collected and assesses the effectiveness of the sexual abuse prevention, detection and response policies, practices, and training. The agency prepares an annual report and posts the information on the website. Further, the only information redacted from the agency report is personal identifying information. All other information is included in the annual report.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates 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</p>

- 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 as a whole

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 3, a, 1-3, states the PREA Coordinator or authorized designees shall review the data collected in subsection L(2) above in order to assess and improve the effectiveness of the department's sexual abuse prevention, detection, and response policies, practices, and training, including:

1. Identifying problem areas;
2. Taking corrective action on an ongoing basis; and
3. Preparing an annual report of its findings and corrective actions for each lockup, as well as the department as a whole.

Provision (b)

The PAQ indicates the agency's first annual report will be in 2025 and it will include a comparison of the 2025 data and corrective actions with those from 2024 and provide an assessment of the agency's progress in addressing sexual abuse

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 3, a, 1-3, a, states such a report shall 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.

Provision (c)

The PAQ indicates the agency's annual reports will be approved by the agency head and made readily available to the public through its website.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 3, b, states the department's annual report prepared in subsection L(3)(a)3 above shall be approved by the Commissioner and made readily available to the public through the department's public web site.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 3, c, a, states 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's

	<p>public web site. Before making any aggregated sexual abuse data publicly available, the department shall ensure that all personal identifiers are removed.</p> <p>Provision (d)</p> <p>The PAQ indicates the agency indicates 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</p> <p>Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 3, b, 1, states 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.</p> <p>CONCLUSION:</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding data review for corrective action.</p>
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115.189	<p>Data storage, publication, and destruction</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. • Department of Emergency Services and Public Protection (DESPP), Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024 <p><u>INTERVIEWS</u></p> <p>PREA Coordinator (PC) Interview</p> <p>Through the interview process the PC acknowledged all data obtained is securely retained for a period of at least ten years after the date of initial collection unless Federal, State or local law requires otherwise. The only information redacted from the agency report is personal identifying information.</p> <p><u>PROVISIONS</u></p> <p>Provision (a)</p>
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The PAQ indicates the agency ensures that data collected is securely retained

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 4, a, states DESPP shall ensure that data collected pursuant to subsection (L)2 above are securely retained.

Provision (b)

The PAQ indicates the agency makes 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

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 3, c, states

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's public web site.

Provision (c)

The PAQ indicates the agency removes all personal identifiers before making aggregated sexual abuse data publicly available.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 3, c, a, states before making any aggregated sexual abuse data publicly available, the department shall ensure that all personal identifiers are removed.

Provision (d)

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.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 13, L, 4, b, states 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.

CONCLUSION:

Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding data

	storage, publication and destruction.
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. <p><u>PROVISIONS</u></p> <p>Provision (a)</p> <p>The PAQ indicates during the prior three-year audit period, the agency did not ensure 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.</p> <p>Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date 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 lockup 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.</p> <p>Provision (b)</p> <p>The PAQ indicates during each one-year period starting August 20, 2024, the agency will ensure that at least one third of each facility type operated by the agency is audited.</p> <p>(1) Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 14, M, 4, a-g, states As part of its participation in such an audit, DESPP shall ensure that auditors have access to all areas of the audited facility, and DESPP shall provide full cooperation to auditors, including facilitating each of the following:</p> <ul style="list-style-type: none"> • (a) Allowing auditors to review all relevant agency-wide policies, procedures, reports, internal and external audits, and accreditations for each

facility type.

- (b) Providing auditors with a sampling of relevant documents and other records and information for the most recent one-year period for review.
- (c) Fulfilling any request for copies of any relevant documents (including electronically stored information).

Requests may be forwarded to Legal Affairs for consideration.

- (d) Allowing auditors to interview a representative sample of detainees, staff, supervisors, and administrators.
- (e) Allowing auditors to review a sampling of any available videotapes and other electronically available data that may be relevant to the provisions being audited, including providing a copy of such video/data if requested by the auditor.

Requests may be forwarded to Legal Affairs for consideration.

- (f) Permitting the auditor to conduct private interviews with detainees.
- (g) Permitting detainees to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

Provision (h)

The PAQ indicates the auditor shall have access to, and shall observe, all areas of the audited facilities.

Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 14, M, 2, a-b, states for those department lockups that are subject to audits, at least one-third of each facility type operated by the department shall be audited in a one-year period starting August 20 and ending August 19. Each department lockup that is subject to audit shall be audited at least once in the three- year period commencing on August 20, 2022, and during each three-year period thereafter. Strong consideration should be given to the PREA Coordinator to attend these audits to maintain consistency.

Provision (i)

The PAQ indicates the auditor shall be permitted to request and receive copies of any relevant documents including electronically stored information.

See provision (b).

Provision (m)

The PAQ indicates the auditor shall be permitted to conduct private interviews with detainees.

	<p>See provision (b).</p> <p>Provision (n)</p> <p>The PAQ indicates 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.</p> <p>See provision (b).</p> <p><u>CONCLUSION:</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding frequency and scope of audits.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p><u>DOCUMENT REVIEW</u></p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire and supporting documentation. <p><u>PROVISIONS</u></p> <p>Provision (f)</p> <p>The PAQ indicates the agency will 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.</p> <p>Department of Emergency Services and Public Protection, Administration and Operations Manual, Prison Rape Elimination Act (PREA) Standards and Procedures, A&O Section #19.03.30, Revision Date March 6, 2024, p. 15, M, 6, states DESPP shall ensure that the final report of any audit conducted pursuant to the requirements of 28 CFR 115.193 is published on the department’s public web site.</p> <p><u>CONCLUSION:</u></p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined the agency/facility meets every provision of the standard regarding audits findings and contents.</p>

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 harassment	
	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
115.113 (d)	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
115.114 (a)	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
115.115 (a)	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
115.115 (b)	Limits to cross-gender viewing and searches	
	Does the lockup document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
115.115 (c)	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 their breasts, buttocks, or genitalia, except in exigent	yes

	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 limited English proficient	
	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: Detainees who are blind or have low vision?	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
	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 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: Other? (if "other," please explain in the overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with detainees who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees who: Have intellectual disabilities?	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: are blind or have low vision?	yes
115.116	Detainees with disabilities and detainees who are limited	

(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 limited English proficient	
	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

	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 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
115.117 (b)	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 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with detainees, does the agency: Perform a criminal background records check?	yes
	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
115.117 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with detainees?	yes
115.117 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with detainees or have in place a system for otherwise capturing such information for current employees?	yes
115.117 (f)	Hiring and promotion decisions	

	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 investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.122 (b)	Policies to ensure referrals of allegations for investigations	
	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

	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 of the 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?	yes
115.132 (b)	Detainee, contractor, and inmate worker notification of the 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 sexual harassment?	yes
115.134 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees and volunteers pursuant to §115.131, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not	yes

	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

	and criminal history? (N/A if lockup is NOT used to house detainees overnight.)	
115.151 (a)	Detainee reporting	
	Does the agency provide multiple ways for detainees to privately report: Sexual abuse and sexual harassment?	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: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.151 (b)	Detainee reporting	
	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
	Is that entity or office able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the detainee to remain anonymous upon request?	yes
115.151 (c)	Detainee reporting	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment ?	yes
115.151 (d)	Detainee reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of detainees?	yes
115.154 (a)	Third-party reporting	

	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 accordance with these standards?	yes
115.164 (a)	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 the report required to: Separate the alleged victim and abuser?	yes
	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: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	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: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating,	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

	<p>receiving facility of the victim's 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.)</p>	
115.166 (a)	Preservation of ability to protect detainees from contact with abusers	
	<p>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?</p>	yes
115.167 (a)	Agency protection against retaliation	
	<p>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?</p>	yes
	<p>Has the agency designated which staff members or departments are charged with monitoring retaliation?</p>	yes
115.167 (b)	Agency protection against retaliation	
	<p>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?</p>	yes
115.167 (c)	Agency protection against retaliation	
	<p>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?</p>	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

	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 investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.176 (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 sexual 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 sexual 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 services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.186 (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.)	na
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

	does not have one, through other means?	
115.188 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a lockup?	yes
115.189 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.187 are securely retained?	yes
115.189 (b)	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 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.189 (d)	Data storage, publication, and destruction	
	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
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	

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

	single facility agencies, there has never been a Final Audit Report issued.)	
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