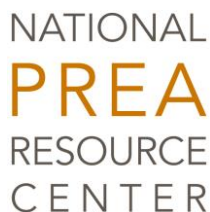


PREA AUDIT REPORT INTERIM FINAL

ADULT PRISONS & JAILS



Auditor Information			
Auditor name: Susan J. Jones			
Address: P.O. Box 1162, Canon City, CO 81215			
Email: sjjcanoncity@gmail.com			
Telephone number: 719-429-5258			
Date of facility visit: August 3 and 4, 2016			
Facility Information			
Facility name: Washington County Justice Center			
Facility physical address: 26861 US Hwy 34, Akron, CO 80720			
Facility mailing address: <i>(if different from above)</i>			
Facility telephone number: 970-345-6865			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Prison	<input checked="" type="checkbox"/> Jail	
	Name of facility's Chief Executive Officer: Jon Stivers		
Number of staff assigned to the facility in the last 12 months: 28 current employees who work in the jail, 22 of them have been hired in the past year.			
Designed facility capacity: 220			
Current population of facility: 190			
Facility security levels/inmate custody levels: minimum – maximum security			
Age range of the population: 18-80			
Name of PREA Compliance Manager: David Werner		Title: Sergeant	
Email address: d Werner@co.washington.co.us		Telephone number:	970-345-6865
Agency Information			
Name of agency: Washington County Justice Center			
Governing authority or parent agency: <i>(if applicable)</i>			
Physical address: 26861 US Hwy 34, Akron, CO 80720			
Mailing address: <i>(if different from above)</i>			
Telephone number: 970-345-6865			
Agency Chief Executive Officer			
Name: Jon Stivers		Title: Sheriff	
Email address: jstivers@co.washington.co.us		Telephone number:	970-345-6865 ext 2001
Agency-Wide PREA Coordinator			
Name: Amanda Stivers		Title: Captain	970-345-6865 ext 2003
Email address: astivers@co.washington.co.us		Telephone number:	

AUDIT FINDINGS

NARRATIVE

This is the FINAL Report

The audit of the Washington County Detention facility was conducted by Susan Jones, Certified PREA auditor. This audit was communicated in advance to staff and offenders by a posted notice. This notice was posted in areas throughout the facilities beginning on June 22, 2016. The notice provided contact information for the auditor and directed that any information be forwarded to the post office box listed, at least ten days in advance of the on-site portion of the audit. No letters or other information was received by the auditor prior to the audit.

Prior to the on-site audit, the facility provided policies, procedures and facility documentation for each standard. Communication occurred between the auditor and the PREA coordinator and the PREA compliance manager regarding specific standards and compliance issues.

The on-site audit was conducted beginning at 1 p.m. August 3, 2016. The auditor remained at the facility until approximately 9:30 p.m. on that date. The auditor returned on August 4, at approximately 9 a.m. and completed the audit on-site visit at approximately 11:30 a.m.

During the on-site portion of the audit, the auditor was allowed free access to all areas of the facility, access to interview offenders and to any documentation requested. Free access was also provided to conduct random staff interviews on each shift.

The on-site portion of the audit included a tour of housing units, day rooms, intake areas, recreation areas, and kitchen.

Due to the size of this facility, many of the employees were tasked with completion of more than one role as required by the specialized interview protocol. Interviews of specialized staff included the Agency Head-Sheriff, Warden- Undersheriff, PREA Coordinator, PREA compliance manager, medical provider, SANE nurse, mental health provider, one volunteer, contractors (clinical and food service), Investigator, and the staff member designated with monitoring retaliation. These interviews included asking questions regarding the contract administration, and the responsibilities of the incident review team.

The employees who were assigned to intake were interviewed. The staff member assigned to intake also performs screening for risk of victimization and abusiveness and they supervise segregated housing. Additionally, eleven staff members during the evening shift on August 3 and during the day shift on August 4, 2016. All county employees and contract employees interviewed were asked about first responder duties.

Fifteen inmates were interviewed: ten male and five female. These inmates were randomly selected by the auditor and included at least one inmate from each housing pod. Offender interviews included those with limited English proficiency, those who identified as transgender, intersex, gay, lesbian or bisexual, and those who have reported a violation of sexual abuse or harassment.

On August 4, Paula Bragg was interviewed, via phone, regarding the MOU in place for SARA House. This agency provides support including immediate advocacy, response to the facility in-person, ability to be present during the forensic exam and investigative interviews, and to provide support, crisis intervention, resources and referrals.

The exit meeting was held on August 4 at 12:30 p.m. The Sheriff, Under-Sheriff, PREA compliance manager, and PREA coordinator were present for this meeting.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Washington County Justice Center opened in July of 2001. This 250-bed facility houses all levels of inmates, both male and female, from the minimum security population to the maximum - segregation populations. The facility houses three different types of inmates: local, federal, and state parole revocations.

At the time of the audit, there were 32 female inmates and 143 male inmates. There were 148 inmates who were from the Department of Corrections: 146 TPV and 2 DOC backlogs. Ten inmates were housed for the US Marshals and 17 were local inmates or from other agencies.

The facility is entirely under one roof and provides corridor access to all areas of the facility. The Washington County courts are also housed in the same building. The housing units are divided into 8 different pods that surround a control center hub area. Deputies make rounds throughout all of these pods throughout their shift.

Most of the detention employees are working a 12 hours shift (6-6). The supervisors work an offset shift to allow for overlapping shift coverage (5-5). Control center operators work two ten hour shifts.

The clinical services and the food service providers are contracted with the county. Trinity Services Group, Inc. currently manages the food service operation and Correctional Health Partners (CHP) manages the clinical services. Centennial Mental Health provides substance abuse treatment programs to the State parole inmates. Volunteers are also recruited to provide programs for the inmate population.

The facility is built in a manner that allows for efficient use of staff and service delivery. The facility was clean and well maintained.

SUMMARY OF AUDIT FINDINGS

The following issues were identified as needing additional attention during the on-site audit: staffing plan, pat searches of transgender inmates, employee training, inmate education, specialized training for clinical staff, transgender housing placement, grievance procedures, and reporting terminations of applicable employees to licensing bodies.

The facility modified the staffing plan and the process for deviation of this plan. The modified plan and process allows for full compliance with the standard and efficient use of their staffing resources.

The employee training was modified and re-delivered to all employees. The training was modified to include all required elements of the standard as well as additional information regarding the pat search of transgender inmates.

The inmate education process was in place but the documentation inadequately demonstrated the compliance with the standard. A form has been modified to fully document the information provided to all inmates upon entry to the facility.

Specialized training for clinical staff was not in place prior to the on-site audit. Training has been provided to all clinical staff that fully complies with the standard.

The facility did not have an emergency grievance process in place for PREA related grievances. This has been changed and inmates were provided information regarding this change on the Kiosk system and in the inmate handbook.

Policy was not in place to report terminations for violations of sexual abuse or sexual harassment policies to licensing bodies. This issue has been corrected.

Number of standards exceeded: 2

Number of standards met: 38

Number of standards not met: 0

Number of standards not applicable: 3

Total standards: 43

Throughout this audit process, the written documentation, observations of staff and offender interaction, and the interviews with staff and offenders demonstrated a commitment to the principles of PREA. Washington County Detention Facility **is in full compliance with the PREA standards.**

Standard 115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

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

The policy of this facility thoroughly addresses the zero tolerance of sexual abuse and sexual harassment. The PREA coordinator is clearly delineated on the organizational chart and reports directly to the Under-Sheriff. The policy documents include a comprehensive plan to prevent, detect and respond to sexual abuse or harassment.

As a result of interviews and on-site inspections, it is apparent that the PREA coordinator has sufficient support and time to complete the duties as required by this standard.

Standard 115.12 Contracting with other entities for the confinement of inmates

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

This facility does not contract with any other jurisdiction to house Washington County inmates. They do contract to house inmates from other jurisdictions.

Standard 115.13 Supervision and monitoring

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

The facility was operating under a staffing plan prior to the on-site audit. During the on-site audit, including interviews with staff, issues regarding the effectiveness of this plan were identified. As a result, the facility modified the staffing plan and the process required for any deviation of this plan. The modified plan and process allows for full compliance with the standard and efficient use of staffing resources.

The modified plan requires a total of three people on duty at all times and any deviation from this requirement will be documented to comply with the standard.

Unannounced rounds are required in policy and the policy includes prohibiting other staff from alerting other

employees that a supervisor is in route to their area. The log sheet provided show these rounds are completed on an irregular basis on all shifts.

Standard 115.14 Youthful inmates

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

This facility does not house any individual under the age of 18. Anyone under the age of 18 is reviewed by a juvenile screener and then transferred to a juvenile holding center. This screening does not occur within the detention area, as such, the sight and sound separation necessary between adult and youthful offenders is met. This standard is not applicable.

Standard 115.15 Limits to cross-gender viewing and searches

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

Washington County Justice Center does not allow any cross-gender strip searches of male or female population. The facility is constructed in such a manner that allows for privacy for inmates to shower and change clothing. In addition, the video recording system has been set up to actually provide a blocked out area on screen so that additional privacy is provided for the toilet/shower areas.

The training provided to staff has been modified to fully comply with this standard. The search of transgender inmates is covered in depth in this training.

A review of the physical plant, as well as interviews conducted during the audit, indicate that the standard is in full compliance.

Standard 115.16 Inmates with disabilities and inmates who are limited English proficient

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

This facility has signed a contract with the CTS language link for emergency and non-emergency use. As a result of on-site interviews and observing practice, it is clear that the facility is in compliance with this standard. A revision was made to the booking/intake form to allow for easy identification of special assistance that is provided to inmates to ensure that they understand the PREA information provided to them.

Posters and informative signs are in place throughout the facility to provide inmates with pertinent information regarding PREA resources. Based upon my observations of the booking process and interviews conducted with inmates, I believe that the PREA information is provided in an appropriate manner.

Standard 115.17 Hiring and promotion decisions

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

The job application for new employees meets all aspects of this standard. All current employees have had a background check conducted within the past five years. A process has been put in place to ensure that the five year requirement is monitored.

The facility contacts prior institutional employers to ensure that the prospective candidate do not have a history of sexual abuse allegations/ investigations or substantiated complaints.

Interviews conducted on-site confirmed that employees, contractors, and volunteers understood their affirmative duty to report any previous misconduct.

A new Colorado law is in place that allows for greater ease toward complying with the requirement that agencies must provide information on former employees regarding sexual abuse or sexual harassment. The Colorado General Assembly passed 16-1262 which protects agencies from liability for this type of sharing of information.

Standard 115.18 Upgrades to facilities and technologies

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

Modifications have been made to the following areas of the facility during the past year:

1. New control Board Video Monitoring/Camera.
2. Installation of camera (Increase cameras/monitoring screens)
3. Repairs to doors.
4. New medical contract.

5. JMS/RMS contract with e-force.
6. LexisNexis/Trinity kiosk Interface.

The facility provided evidence that these repairs/upgrades were pursued to increase safety and security in the facility. Many of these modifications were made to enhance the facility's ability to protect inmates from sexual abuse.

Standard 115.21 Evidence protocol and forensic medical examinations

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

The evidence protocol used in this facility is based upon the National Protocol for Sexual Assault medical Forensic Examinations. During the audit I interviewed the SANE nurse that is assigned to provide services to this facility. This process is fully compliant with the requirements of the standard. Additionally, the facility entered into a MOU with SARA House to provide victim advocate services. The agreement details the services that would be provided, if needed. These services include ability for a victim advocate to be present during the forensic medical exam and investigatory interviews.

This facility investigates most allegations of sexual abuse. However, they have also entered into an agreement with the Morgan County Sheriff's office to investigate any allegations that involve a staff member or when any perceived or real conflict of interest may exist.

The agreement with Morgan County represents a method that exceeds the standard requirements and is done to ensure thorough and unbiased investigations.

Standard 115.22 Policies to ensure referrals of allegations for investigations

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

The policy for Washington County requires that the Shift Supervisor shall report to the office's designated investigators all allegations of sexual abuse, harassment, retaliation, or neglect. This includes third-party and anonymous reports. Interviews conducted on-site and a review of on-site records indicates that a total of five investigations were conducted in the past twelve months. Three of those were administrative investigations and were all determined to be unfounded. Two were criminal investigations; one is still open, awaiting an examination of the evidence from CBI.

The process of referral of all allegations was confirmed by staff at all levels in the facility. The coordination or investigations between Washington County and Morgan County was found to be consistent with the policy and standard requirements.

Standard 115.31 Employee training

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

All staff, volunteers and contractors have been trained during the past twelve months, however, not all requirements of the standard was included in this training. Consequently, all employees and contract staff were re-trained after the on-site audit to ensure that all requirements were met and the staff was fully informed regarding the processes required by PREA and agency policy. The revised training also included additional information regarding the pat search of transgender inmates.

The following areas were not sufficiently addressed in the training provided to staff, prior to the on-site audit:

- (3) The right of inmates to be free from sexual abuse and sexual harassment.
- (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment.
- (5) The dynamics of sexual abuse and sexual harassment in confinement.
- (7) How to detect and respond to signs of threatened and actual sexual abuse.
- (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender-nonconforming inmates.
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The policy of Washington County indicates that the facility will provide refresher training every two years and refresher information on a quarterly basis, which is more often than the standard requires.

Standard 115.32 Volunteer and contractor training

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

Four volunteers and 6 contractors were trained in the past 12 months. They are provided information in the Washington County Jail Guide on Sexual Abuse Prevention and Response for Volunteers and Contractors. This information is appropriate for volunteers and contractors. Volunteers and contractors also attend the same training as the facility staff.

During the on-site audit, I interviewed one volunteer and three food service contractors to ascertain their understanding of the training and responsibilities. Each person interviewed was able to accurately answer my questions.

Standard 115.33 Inmate education

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

At this facility, inmates received the initial notice of the zero tolerance policy and the comprehensive education during the booking process. This process is usually completed within twelve hours or less. While this process was in place, the documentation that detailed the extent of the comprehensive education was inadequate. The form has been modified to fully document the information provided to all inmates upon entry to the facility. Additionally, any special assistance provided to individual inmates is now documented on the same form.

During the on-site audit, I observed the booking process and saw evidence that the booking staff were mindful to make sure the inmate understood the information. The video in use provides all required elements and it will be delivered with close-captioning for all inmates.

Standard 115.34 Specialized training: Investigations

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

The assigned Investigator and three other supervisory/command level staff have attended appropriate training for sexual abuse investigation within correctional facilities. The course: "Prison Rape and Sex Assault Investigations Inside Correctional Facilities" is a criminal investigation course developed pursuant to PREA standards 115.34 & 115.71, requiring investigators receive specialized training for conducting sex abuse investigation in confinement settings.

Standard 115.35 Specialized training: Medical and mental health care

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

Specialized training for clinical staff was not in place prior to the on-site audit. Training has been provided to all clinical staff that fully complies with the standard.

Standard 115.41 Screening for risk of victimization and abusiveness

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

Washington County has implemented an Assessment Screen to detect victimization and risk of sexually abusive individuals. The use of this form was implemented on March 9, 2016. This screening occurs during the booking process before inmates are moved to the housing unit. Each inmate is reassessed by the PREA coordinator or PREA compliance Manager within 72 hours after booking.

The information gained from these assessments is accessible to supervisory and command level staff, but it is maintained in an area adjacent to booking to ensure control of the information.

Standard 115.42 Use of screening information

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

The information received at booking is used to inform housing and program assignments.

As a result of the on-site audit, the process for consideration of placement of transgender inmates was re-examined and modified. The revised process and revised forms will do a better job of detailing the options considered, including the views of the inmate who is being reviewed.

Washington County Detention Center does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status. They are not under the control of a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

The facility is equipped with individual showers, so all inmates shower separately. Washington County has added an additional option by allowing transgender and intersex inmate to shower during lock-down time or to be taken to booking to shower separately. Interviews of staff and inmates conducted on-site, confirm these options, even though there is no evidence that these options have been requested by any inmate.

Standard 115.43 Protective custody

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

Washington County has one individual who is presently housed in protective custody in segregation. This housing was requested by the individual inmate, after understanding other housing options. This individual feels they are at risk of sexual victimization. While in segregation, inmates have access to programs, privileges, or work opportunities. Evidence was presented that indicated that the review of this individuals housing status is being done on a more frequent basis than that required by the standard.

During the on-site audit visit, I interviewed this person and listened to her perspective of the placement decision. This approach to safety and adequate housing opportunities seems to be in keeping with the requirements of this standard.

Standard 115.51 Inmate reporting

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

The facility provides multiple methods for staff and inmates to report abuse, as well as third party reports. The policies in place meet all portions of this standard.

A speed dial system is built into the inmate's phone system. Inmates can call the Yuma County Sheriff's office directly. They also have an MOU with Yuma County to receive third party reports. These reporting methods were tested by the auditor during the on-site audit. The speed dial contact did not work as required, but the facility took immediate action to correct this deficiency. A follow up phone call the next day did in fact work as required. A number for ICE detainees to contact was also provided.

During interviews with staff and inmates it was obvious that they were very familiar with the different reporting options and they knew where to find the appropriate information to make a report.

Standard 115.52 Exhaustion of administrative remedies

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

The policy complies with the requirements of the standard. The Washington County Detention Facility did not receive any grievances in the past 12 months that alleged sexual abuse.

At the time of the on-site audit the facility did not have an emergency grievance process in place for PREA related grievances. This has been changed and inmates were provided information regarding the new process via the Kiosk system as well as the inmate handbook.

Standard 115.53 Inmate access to outside confidential support services

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

Inmates at Washington County are provided information to access outside emotional support with community providers and national hotline centers. The contact information was verified as correct and open to accepting phone calls from inmates and their families. Contact for the following agencies is provided for inmates to contact:

Colorado Coalition Against Sexual Assault (CCASA) provides information and referrals to survivors of sexual abuse.

1120 Lincoln Street, Suite 700
Denver, CO 80203
Phone: (303) 839-9999

National Sexual Assault Hotline
SPEED DIAL CODE: 4673
1 800 656 4673 (HOPE)

Just Detention International (JDI) provides confidential support, information, and referrals to anyone who has been sexually abused in detention.

SPEED DIAL CODE: 1400

Cynthia Totten, Attorney at Law
CA Attorney Reg. #199266
3325 Wilshire Blvd., Suite 340
Los Angeles, CA 90010
Phone: (213) 384-1400

Inmates are advised that communication to these agencies may be monitored or recorded.

Standard 115.54 Third-party reporting

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

The following statement is located on the Washington County Sheriff's website:

The Washington County Justice Center follows the guidelines set out by the Prison Rape Elimination Act

(PREA). Washington County is committed to zero-tolerance of any form of sexual abuse and sexual harassment in the facility it operates or with which it holds contracts. If you would like to report a case of sexual harassment or sexual abuse of a loved one who is housed within the Washington County Justice Center, call Washington County Sheriff's Office at 970 345-2244. All Reports will be investigated!

This information is not easily found on the web site. The agency has plans to redesign portions of their webpage to make it easier to locate this information.

Additionally, a poster is displayed with this information in the entry of the facility for any family or friends that may be visiting.

Standard 115.61 Staff and agency reporting duties

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

All aspects of this standard are covered completely by policy, including a policy from the medical provider – Correctional Health Partners (CHP). The policy from CHP clearly articulates the responsibility of the health care staff to immediately report sexual abuse. This facility does not house inmates under the age of 18. All reports are referred to the appropriate investigators.

Standard 115.62 Agency protection duties

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

The facility has a process to take immediate action if an inmate is at substantial risk, either at booking or later after placement within the facility. Examples of the process and placement reviews were examined. The facility is built in a manner that allows for flexibility within their housing areas, including a housing area that is near the booking area.

Standard 115.63 Reporting to other confinement facilities

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

The Washington County Policy states: Upon receiving an allegation that a detainee was sexually abused while confined at another facility, the Shift Supervisor shall notify the head of the facility or the appropriate office of the agency where the alleged abuse occurred. The notification shall be made as soon as possible but no later

than 72 hours after receiving the allegation. The Shift Supervisor shall document such notification.

After the on-site audit visit, two inmates revealed an assault that occurred at another facility. This first allegation was not forwarded within the 72 hours (it was forwarded on the fourth day). This error was corrected and the next allegation was forwarded within the 72 hours as required by these standards.

Standard 115.64 Staff first responder duties

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

All of the requirements of this standard are included in the policy and training.

During the on-site audit visit, all staff who were interviewed were asked about their first responder duties. These security and non-security staff were able to clearly identify their duties.

The facility has also provided all staff with reference cards that detail their first responder duties, as well as other important PREA related information. Staff were aware of this resource and were able to retrieve the needed information easily, when asked.

Standard 115.65 Coordinated response

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

The facilities plan includes a detailed and coordinated approach to a sexual abuse incident. The roles of the first responder, supervisor, jail administration, health care staff, security staff, investigators and the district attorney are clearly detailed.

During the on-site audit visit, staff at all levels were questioned about their particular role and “what comes next” in the process. The information provided was very consistent with the coordinated plan.

Standard 115.66 Preservation of ability to protect inmates from contact with abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the

relevant review period)

- Does Not Meet Standard (requires corrective action)
- Not Applicable

The Washington County Sheriff's Office does not have a Collective Bargaining Agreements with any group. This standard is not applicable.

Standard 115.67 Agency protection against retaliation

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

The Lieutenants are charged with monitoring any individual who has made an allegation or fears retaliation. Part of this monitoring includes periodic checks that include a review of incident reports, housing assignments and any other relevant information. During the on-site audit visit the Lieutenant assigned to monitoring was able to describe the duties required by this standard.

Standard 115.68 Post-allegation protective custody

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

There have been no incidents of post-allegation protective custody during the past twelve months. However, as part of the first responder duties, inmates have been separated for an appropriate length of time to allow for an investigation to be completed.

A review of policies and interviews with staff, during the on-site audit visit, reveal that this agency is in compliance with this standard.

Standard 115.71 Criminal and administrative agency investigations

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

The Washington County Detention Center has no substantiated cases or allegations of conduct that appeared to be criminal that were referred for prosecution since August 20, 2012.

The records retention schedule for the county requires that the investigative files related to sexual assault are kept for 99 years, which is beyond that required by the PREA standard.

Washington County has four individuals who have attended special training in sexual abuse investigations, including the assigned investigator.

The most recent investigative files were examined and detail the information required by this standard. Additionally, the assigned investigator was interviewed during the on-site audit visit and was able to verify that all investigations, whether criminal or administrative, are examined to determine if staff actions or failures contributed to the abuse or harassment.

Standard 115.72 Evidentiary standard for administrative investigations

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

The Washington County Sheriff’s Office policy requires a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. The interview with the assigned investigator confirmed this policy statement.

Standard 115.73 Reporting to inmates

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

Washington County verbally notifies the inmate whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded from the investigation. In the future, Washington County will ensure that this notification is documented with a letter stating the outcome. A copy will be held in the hard file and scanned into the electronic file.

Standard 115.76 Disciplinary sanctions for staff

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

Washington County has not had any violation by staff of the agency’s sexual abuse or sexual harassment policies in the last 12 months.

The policy states that all terminations for violations of agency sexual abuse or sexual harassment policies or resignation during an investigation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal and to any relevant licensing boards . Policy was not in place to report terminations for violations of sexual abuse or sexual harassment policies to licensing bodies. This issue has been corrected and there have been no such violations by staff that possess a license, during the past 12 months.

Standard 115.77 Corrective action for contractors and volunteers

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

In the past 12 months, Washington County has not had any reports of sexual abuse of inmates from any contractors or volunteers within the facility. Any violation of the agency’s sexual abuse or sexual harassment policy by contractors or volunteers would be handled by barring the individual from the facility.

Standard 115.78 Disciplinary sanctions for inmates

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

The agency prohibits all sexual activity between inmates. This information is provided to inmates in the inmate handbook. All requirements of this standard are adequately reflected in policy. No inmates have been disciplined for sexual activity between inmates in the past year.

Standard 115.81 Medical and mental health screenings; history of sexual abuse

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

All inmates are provided a follow up 14 day screening by medical staff. During the past year no inmates have indicated during the screening process that they previously perpetrated sexual abuse. During the past year, five inmates disclosed prior victimization during screening.

Information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments.

Standard 115.82 Access to emergency medical and mental health services

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

All aspects of this standard are covered thoroughly. The medical policy as well as facility policy addresses each of the requirements of this standard. Inmates are provided immediate care at no cost to themselves. Additionally, inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Standard 115.83 Ongoing medical and mental health care for sexual abuse victims and abusers

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

Policy complies with all aspects of this standard. The policy includes referrals for follow up care after release. Services are provided to victims of sexual abuse while incarcerated at no cost. Tests for pregnancy, as well as referrals for all lawful pregnancy related services are available to inmates in Washington County.

Standard 115.86 Sexual abuse incident reviews

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

Policy for the incident review team includes identification of the members, items for consideration and follow-up actions. While this incident review process has not yet been conducted, the incident review team consists of the undersheriff, PREA coordinator, PREA Compliance Manager, the supervisors/sergeants involved, medical and mental health staff and investigators.

Standard 115.87 Data collection

- Exceeds Standard (substantially exceeds requirement of standard)

- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

The Washington County Detention Center has collected the required data and it was submitted to the Department of Justice on August 11, 2016.

Standard 115.88 Data review for corrective action

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

The Washington County Detention Center reviews data collected and aggregated pursuant to 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training and to date has zero incidents to report.

The first annual report is available on the county website and will be used to compare to next year's data.

Standard 115.89 Data storage, publication, and destruction

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

Data is available on the agency's website. This data has had all identifiers removed. The records policy complies with the PREA standards.

AUDITOR CERTIFICATION

I certify that:

- ✓ The contents of this report are accurate to the best of my knowledge.
- ✓ No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- ✓ I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.



Auditor Signature

September 4, 2016
Date