

PREA Facility Audit Report: Final

Name of Facility: Women's Therapeutic Residential Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 06/06/2025

Auditor Certification

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



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



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



Auditor Full Name as Signed: Debra D. Dawson

Date of Signature: 06/06/2025

AUDITOR INFORMATION

Auditor name: Dawson, Debra

Email: dddawsonprofessionalaudits@gmail.com

Start Date of On-Site Audit: 04/27/2025

End Date of On-Site Audit: 04/29/2025

FACILITY INFORMATION

Facility name: Women's Therapeutic Residential Center

Facility physical address: 480 Green Chapel Road , Henning , Tennessee - 38041

Facility mailing address:

Primary Contact

Name:	Shakera E. Greer
Email Address:	Shakera.E.Greer@tn.gov
Telephone Number:	(731) 738-5044

Warden/Jail Administrator/Sheriff/Director	
Name:	Stanley Dickerson
Email Address:	Stanley.C.Dickerson@tn.gov
Telephone Number:	(731) 738-5044

Facility PREA Compliance Manager	
Name:	Salathiel Jones
Email Address:	salathiel.m.jones@tn.gov
Telephone Number:	(731) 738-5044

Facility Health Service Administrator On-site	
Name:	Regina Bledsoe
Email Address:	rbledsoe1@TeamCenturion.com
Telephone Number:	(731) 738-5044

Facility Characteristics	
Designed facility capacity:	1228
Current population of facility:	1176
Average daily population for the past 12 months:	1068
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Women/girls

In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	18-77
Facility security levels/inmate custody levels:	Close Custody, Minimum Restricted, Medium Custody
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	166
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	72
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	165

AGENCY INFORMATION	
Name of agency:	Tennessee Department of Correction
Governing authority or parent agency (if applicable):	Not Applicable
Physical Address:	320 Sixth Avenue North, Nashville, Tennessee - 37243
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:
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Name:	Frank Strada
Email Address:	Frank.Strada@TN.GOV
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Elizabeth Stout	Email Address:	liz.e.stout@tn.gov

Facility AUDIT FINDINGS	
Summary of Audit Findings	
<p>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.</p> <p>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.</p>	
Number of standards exceeded:	
0	
Number of standards met:	
45	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-04-27
2. End date of the onsite portion of the audit:	2025-04-29

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:	Shelby County Crime Victims & Rape Crisis Center; Jackson - Madison General Hospital

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1228
15. Average daily population for the past 12 months:	1068
16. Number of inmate/resident/detainee housing units:	14
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	1160
19. 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:	68
20. 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:	46
21. 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:	15
22. 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:	13
23. 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:	9
24. 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:	135

25. 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:	8
26. 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:	7
27. 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:	117
28. 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
29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
30. 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:	178
31. 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:	172

32. 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:	90
33. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	21
35. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<div> <input checked="" type="checkbox"/> Age </div> <div> <input checked="" type="checkbox"/> Race </div> <div> <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) </div> <div> <input checked="" type="checkbox"/> Length of time in the facility </div> <div> <input checked="" type="checkbox"/> Housing assignment </div> <div> <input checked="" type="checkbox"/> Gender </div> <div> <input type="checkbox"/> Other </div> <div> <input type="checkbox"/> None </div>
36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Rosters were requested that included the inmate housing unit assignments, age, race and date of arrival
37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<div> <input checked="" type="radio"/> Yes </div> <div> <input type="radio"/> No </div>

38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	21
<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>	
40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	2
41. 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:	1
42. 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:	1

43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	2
44. 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:	1
45. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	2
46. 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:	3
47. 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:	4
48. 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:	4

49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
49. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div> <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. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Interviews with staff and the inmate population and review of investigative case files did not reveal the placement of inmates in segregation based solely on the risk of sexual victimization/or who allege to have suffered sexual abuse.
50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
51. Enter the total number of RANDOM STAFF who were interviewed:	15

52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<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
53. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
54. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one 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.	
55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	21
56. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No

58. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
59. 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)

60. 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
61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
61. Enter the total number of VOLUNTEERS who were interviewed:	3
61. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
62. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
62. Enter the total number of CONTRACTORS who were interviewed:	4
62. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input checked="" type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
63. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

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.

64. Did you have access to all areas of the facility?

☒ Yes

☐ No

Was the site review an active, inquiring process that included the following:

65. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?

☒ Yes

☐ No

66. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?

☒ Yes

☐ No

67. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?

☒ Yes

☐ No

68. Informal conversations with staff during the site review (encouraged, not required)?

☒ Yes

☐ No

69. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	No text provided.
Documentation Sampling	
Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.	
70. 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?	<input checked="checked" type="radio"/> Yes <input type="radio"/> No
71. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.
SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY	
Sexual Abuse and Sexual Harassment Allegations and Investigations Overview	
Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.	

72. 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	4	0	4	0
Staff-on-inmate sexual abuse	3	1	2	0
Total	7	1	6	0

73. 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	1	0	1	0
Staff-on-inmate sexual harassment	2	0	2	0
Total	3	0	3	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.

74. 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	1	0
Total	0	0	0	1	0

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

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

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.

76. 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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

7

79. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	4
81. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
82. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	3
87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files

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

2

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

☐ Yes

☒ No

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

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

☒ Yes

☐ No

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

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

No text provided.

SUPPORT STAFF INFORMATION**DOJ-certified PREA Auditors Support Staff**

95. 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

95. Enter the TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS who provided assistance at any point during this audit:

1

Non-certified Support Staff

96. 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

97. Who paid you to conduct this audit?

☒ The audited facility or its parent agency

☐ My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

☐ A third-party auditing entity (e.g., accreditation body, consulting firm)

☐ Other

Standards
Auditor Overall Determination Definitions
<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)
Auditor Discussion Instructions
<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>

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> Women's Therapeutic Residential Center (WTRC) Completed Pre-Audit Questionnaire (PAQ) TDOC Index 502.06 Prison Rape Elimination Act (PREA) Implementation, Education, and Compliance (Effective 08/01/2020) TDOC Index 502.06 Prisons Rape Elimination Act (PREA), (Effective 10/21/2024) TDOC Index 502.06.2 PREA Allegations, Investigations, and Sexual Abuse Response Teams (SART) (Effective 08/01/2020) WTRC Index 502.06. 2-1 PREA Allegations, Investigations, and SART (Effective 03-01-2022) SART Meeting Minutes

7. WTRC Organizational Chart

8. TDOC Organizational Chart

9. Appointment Notice of TDOC Statewide PREA Coordinator

10. Appointment Notice of the WTRC PREA Compliance Manager

11. Interviews with:

a. TDOC Statewide PREA Coordinator

b. WTRC PREA Compliance Manager

115.11(a) The agency has comprehensive written policies that mandate zero tolerance toward all forms of sexual abuse and sexual harassment in the TDOC facilities. Index TDOC.502.06 states it is the policy of the TDOC to provide a safe, humane, and appropriately secure environment, free from threat of sexual abuse and sexual harassment for all inmates, by maintaining a program of prevention, detection, response, investigation, and tracking of all alleged and substantiated sexual assaults and sexual harassment. The Directive clearly outlines the agency's zero tolerance policy and identifies the agency's approach to the prevention, detection, and response to sexual assault that includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment that are consistent with the PREA standards. The agency policies also include disciplinary sanctions for those who participate in prohibited acts to include staff, contractors, volunteers, and the inmate population.

In addition to TDOC Index 502.06, the agency also developed TDOC Index 502.06.2. TDOC Index 502.06.2 identify the Sexual Abuse Response Team (SART) as a coordinated response team comprised of medical and mental health practitioners, facility investigators, and facility security leadership. The policy outlines the duties and responsibilities of staff designated to serve on an organized and structured team responsible for developing and maintaining a program of prevention, detection, response, investigation, and tracking of sexual assaults and the persons involved. The policy includes definitions pertaining to PREA, and procedures after receiving an PREA Allegations; PREA Investigations and methods of reporting; Responsibilities of First Responders; SART Response Duties, SART Investigations, Sexual Abuse Incident Review and responsibilities for the review team; Monitoring for Retaliation; Administrative Investigations; Criminal Investigations; Reporting the Status of Allegations to Inmates; Disciplinary Sanctions for Staff; Disciplinary Sanction for Inmates; Sanctions for Contractors and Volunteers; Allegations Occurring in Other Correctional Settings.

The WTRC Index 502.06.2-1 was established in outlining the standardized procedures to request, approve, and govern the actions, reporting procedures, and authority of WTRC regarding PREA Rape Elimination Act (PREA) investigations and the role of the Sexual Abuse Response Team (SART).

TDOC Index 502.06 indicates each PREA Site Coordinator and/or PREA Compliance Manager shall ensure unannounced PREA-free walk (inspection) is conducted monthly

in accordance with the PREA Inspection Team Worksheet, CR-3821. This inspection shall be conducted to identify and deter sexual abuse and sexual harassment. By the 15th of each month, the Warden/Superintendent/Designee shall submit the facility's previous month's PREA Inspection to the Assistant Commissioner of Prisons. The Assistant Commissioner of Prison/Designee shall compile all the facilities reports and forward to each Assistant Commissioner, Deputy Commissioner, Inspector General, Statewide PREA Coordinator, and Director of Decision Support: Research and Planning for review.

Documentation of SART Inspections meeting minutes were presented for each month during the 12-month review period. The meeting minutes documented the inspections of areas visited throughout the facility. The SART members documented victims' referrals for mental health services, review of sexual abuse and sexual harassment investigations, retaliation monitoring review of cameras, placement of continuous PREA educational posters and bulletin notices and implementation of procedures due to findings of sexual abuse and/or sexual harassment investigative findings.

115.11(b) The agency has designated the Director of External Compliance to oversee all external accreditation procedures and efforts to include PREA for all facilities across the state of Tennessee. Additionally, the Director of External Compliance serves as the Statewide PREA Coordinator and is assigned to the TDOC Office of the Inspector General and reports directly to the Deputy Inspector General as noted in the TDOC Organizational Chart. An interview with the Director of External Compliance/TDOC Statewide PREA Coordinator confirmed she has sufficient time to manage the responsibilities of the position. She also receives an enormous amount of support from both the Deputy Inspector General and the Inspector General. Monthly meetings are scheduled with the TDOC facilities PREA Compliance Managers who are assigned at each of the 11 TDOC facilities to discuss updates received and to provide guidance. Additionally, regular interaction is conducted through telephone calls and emails. If any issues are identified that may jeopardize a facility's PREA compliance status, she immediately communicates with the facility's PREA Compliance Manager to determine the cause of the issue while ensuring corrective procedures are initiated and monitored in order for the facility to maintain compliance.

115.11(c) The Associate Warden of Treatment (T) at each TDOC facility also serves as the PREA Coordinator and reports directly to the Warden. The WTRC organizational chart and operational structure plan identifies the WTRC PREA Compliance Manager hold the position of Administrative Assistant to the Associate Warden Treatment/WTRC PREA Coordinator. The WTRC PREA Compliance Manager (PMC) reports directly to the Associate Warden Treatment/WTRC PREA Coordinator to include all duties as the facility's PCM. Per an interview with the WTRC PCM, she indicated her duties include but are not limited to the following: serve as a member of the SART; arrange the scheduling of monthly meetings to discuss reported PREA allegations; participate in conducting unannounced walkthroughs with other members while identifying any concerns in meeting with the PREA standards to include identifying blind spots; serve as a member of the incident review team; ensure PREA education is accurate and continuously posted throughout the facility while accessible to all inmates, staff,

	<p>contractors, volunteers and visitors; and attend monthly Gender Accommodation meetings. Upon identifying areas of concern, the information is immediately shared with the Associate Warden Treatment/WTRC PREA Coordinator and applicable work orders and/or other necessary corrective measures are implemented.</p> <p>Based on the review of agency policies that dedicated the agency's zero tolerance policies, organization charts, appointment notifications of the TDOC Statewide PREA Coordinator, and WTRC PREA Compliance Manager, documentation of monthly SART meeting minutes, WTRC does meet the mandate of all standard provisions.</p>
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115.12	Contracting with other entities for the confinement of inmates
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-audit Questionnaire (PAQ) 2. TDOC Index 502.06 Prison Rape Elimination Act, Implementation, Education and Compliance (August 1, 2020) 3. Prison Rape Elimination Act (PREA) (October 21, 2024) 4. Contracts for Confinement of Inmates Between TDOC with Core Civic 5. TDOC Agency Website 6. PREA Reports for TDOC/Core Civics Contract Facilities 7. Interview with the following: <ol style="list-style-type: none"> a. Agency Contract Administrator <p>115.12 (a) (b) TDOC Index 502.06 states employees of privately managed facilities shall receive PREA training as part of the pre-service and in-service training requirements established by the contractor and approved by TDOC. The Director of Contracts Administration shall ensure that all new TDOC contracts or contract renewals include language requiring compliance with the PREA standards.</p> <p>The TDOC has entered into four (4) contracts for the confinement of inmates with a private agency (Core Civic). Copies of each contract between the Tennessee Department of Corrections and Core Civic were provided for review. The contracts outline PREA Reporting information, definitions, prohibited acts, and other PREA-related requirements. The contracts state the contractor must comply with the Prison Rape Elimination Act (PREA) of 2003 (Federal Law 42 USC 1506 et. seq.) with all applicable Federal PREA standards and all State policies as may be revised and standards related to PREA for preventing, detecting, monitoring, investigating, and</p>

	<p>eradicating any form of sexual abuse within facilities/programs/offices owned, operated, or contracted. In addition, the contract states that the State has the right and authority under the contracts to monitor performance. Such monitoring shall include but not be limited to observing and reporting on the day-to-day operational performance of the contractor regarding compliance with all terms and conditions of the contract.</p> <p>A TDOC Contract Monitor is assigned to each of four (4) contracted facilities whose responsibilities include monitoring and addressing all concerns regarding maintaining compliance with the PREA standard. The Agency Contract Administrator stated the contract is monitored in multiple ways to include reviewing logs for the completion of unannounced rounds, opposite gender announcements, monitoring of mental health encounter logs, timely completion of inmate's risk screenings and applicable submission of mental health referrals, timely completion of PREA investigations, retaliation monitoring and incident reviews in addition all remaining PREA standards. An annual assessment of the PREA practices is monitored to ensure the contracting agency are implementing the PREA standards properly. All contract facilities must submit their DOJ PREA audit reports to the agency for review and confirmation that it maintains PREA compliance. Additionally, each of the contract facilities are scheduled for PREA audit completion within the TDOC agency's three-year audit cycle.</p> <p>The auditing team conducted a review of the TDOC website visit at https://www.tn.gov/correction. The TDOC contract facilities most recent PREA audits were posted on the TDOC's website as the following: Hardeman County Correctional Facility on August 9, 2023; Whiteville Correctional Facility on June 5, 2023; Trousdale Turner Correctional Center most recent posted PREA audit is noted as November 16, 2023. The final PREA report for contract facility, South Central Correctional Center remained pending.</p> <p>Based on the review of the agency's website, contracts between TDOC and Core Civic, agency's website, contracting facilities' PREA reports, and interview with agency contract administrator, the facility is compliant with all standard provisions.</p>
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115.13	Supervision and monitoring
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06 Prisons Rape Elimination Act (PREA) Implementation, Education and Compliance (Effective 08-01—2020) 3. TDOC Index 502.06 Prisons Rape Elimination Act (PREA) (Effective 10-21-2024)

4. TDOC Index 506.22 Security Staff Assignments (Effective 03-15-2023)

5. Sexual Assault Response Team (SART) Meeting Minutes

6. WTRC Annual Staffing Review

7. Security Staff Daily Assignment Rosters

8. Post Assignment Rosters

9. Logbooks Documenting Unannounced Rounds.

10. Site Observation

11. Interviews with:

a. Warden

b. WTRC PREA Compliance Manager

c. Intermediate or Higher-Level Staff

d. TDOC Statewide PREA Coordinator

115.13(a) TDOC Index 502.06 outlines the requirements of a facility staffing plan that provides for adequate levels of staffing and monitoring to protect inmates against sexual abuse. This review shall be completed on the PREA Annual Staffing Review form CR-3964. The WTRC Staffing Plan addresses the eleven components as indicated in this provision that includes the physical layout of the facility including blind-spots or areas where staff or residents may be isolated, composition of the resident population, the prevalence of substantiated or unsubstantiated incidents of sexual abuse, deployment of video monitoring system and other monitoring technologies, resources the facility has available to commit to ensure adherence to the staffing plan, and institution program occurring on a particular shift.

The staffing plan was developed for 1228 inmates. The PAQ noted the average daily number of inmates at WTRC as 886 but was later identified as 1068. The facility's inmate count on the first day of the site observation was 1160.

Per the WTRC Warden, the facility does have a Staffing Plan that includes the consideration of protecting inmates from sexual abuse. Video monitoring is included in addition to the elements described in the standard provision. SART does monthly walkthroughs in different areas to identify any area that may benefit from an additional camera and/or the relocation of existing cameras and identify inoperative cameras for the submission of workorders. The facility has received an upgrade in the video monitoring equipment to include the addition of 360 degree cameras in housing units and installation of cameras in the program area classrooms. The Staffing Plan is annually reviewed and documented; however, areas of the Staffing Plan are discussed regularly during various meetings.

SART meeting minutes were submitted for review. The meeting minutes included but

were not limited to staff monitoring of lighting in areas, operable and inoperable camera and video equipment, restricted area postings, appropriate and inappropriate door security in areas visited, mirror placement monitoring blind spots, the installation of cameras based on a sexual abuse allegation, and the implementation of procedures during individual opposite gender meetings.

Per an interview with the WTRC PREA Compliance Manager, the facility's staffing plan does include all elements of the standard provision. Monitoring for compliance with the Staffing Plan is a daily function that includes ensuring the appropriate staffing is assigned and identifying any camera and/or video monitoring discrepancies are submitted for repair. The installation of cameras and new procedures were implemented for areas where substantiated sexual abuse was concluded to prevent further occurrence. Upon identifying an issue with compliance of a PREA standard to include the Staffing Plan, the information is immediately forwarded to the Associate Warden (T)/WTRC PREA Coordinator.

Throughout the site observation, the auditing team observed the staffing level was adequate and prevalent throughout all areas where inmates are authorized and supervised by security and non-security staff. The auditing team observed the staff's supervision of the inmate population including housing units, program areas, library, food service, work assignments, medical, education, recreation, warehouse, intake during the various shifts. Formal and informal interviews with staff and the inmate population did not express concerns of insufficient staff coverage to include in housing, program and/or work assignment areas that hampered personal safety to include sexual abuse and/or sexual harassment occurrences.

115.13(b) TDOC Index 506.22 notes the Warden/Superintendent will charge one employee with the rank of lieutenant with overall responsibility for the development and maintenance of shift rosters for all shifts, including monitoring and oversight of annual leave scheduling. The assignment officer shall have final authority, subject to the approval of the Warden/Superintendent for planning assignments. The Daily Shift Roster, CR-3371 or CR-3914, shall be used by TDOC facilities to accurately record the daily shift assignments.

When it becomes necessary for a shift commander to make temporary variations, they should be posted on the roster in such a fashion as to show the actual assignment of personnel. In these instances, a notation will be made in the appropriate area on page two of the shift roster. Assignment for more than seven days within a 30-day period to a post assignment which has not received prior approval by the Assistant Commissioner of Prisons must be approved in writing, by the Assistant Commissioner of Prison.

The policy identifies Critical and Non-Critical posts. A critical post is a security position designated by the Warden/Superintendent that must be staffed regardless of institution circumstances and if left unstaffed, would jeopardize the security of safety of the facility, staff, offenders, or the community. A non-critical post is a security position designated by the Warden/Superintendent that when left unstaffed does not jeopardize the security of the facility, staff, inmates, or the community. A non-critical

post will be left unstaffed in lieu of authorizing overtime to staff a critical post.

Per an interview with the Major, the Administrative Lieutenant is responsible for the development of the daily security shift rosters and ensures all critical posts are manned. The Shift Commanders are responsible for necessary daily adjustments due to staff request for sick leave, unscheduled medical trips, unscheduled annual leave, and inclement weather. All roster adjustments are included on the daily rosters and overtime is always available to ensure critical posts are filled.

Per an interview with Warden, although the facility currently has 30 vacant positions, overtime is authorized to prevent the vacancy of critical post assignments. Staff who have completed security training include Probation and Parole, treatment, and administrative staff who have completed security training are authorized to provide security post coverage except for Checkpoint, Central Control and all armed post. Therefore, there are never any circumstances in which critical posts are vacated. The rosters are monitored daily by the Major and Associate Warden of Security, and he conducts a weekly review.

115.13(c) TDOC Index 502.06 notes the mandate of the standard provision that by July 1st of each calendar year, each facility shall assess, determine, and document whether adjustments are needed to the facility staffing plan. The staffing plan review is documented on an agency-wide standardized form. A review of the most recent WTRC Staffing Plan confirmed it was acknowledged as reviewed by the Associate Warden of Treatment/ Facility PREA Coordinator, Chief of Security, Associate Warden of Security, and Warden on June 26, 2024, with final review by the TDOC Statewide PREA Coordinator on July 5, 2024.

Per Statewide PREA Coordinator, she is consulted regarding any assessments of or adjustments to the staffing plan prior to implementation while the Staffing Plan is reviewed annually, however, the facility's Staffing Plan review was conducted prior to her assignment as the Statewide PREA Coordinator.

115.13(d) TDOC Index 502.06 indicates each PREA site coordinator and/or PCM shall ensure that an unannounced PREA-free walk (inspection) is conducted monthly in accordance with the PREA Inspection Team Worksheet, CR-3821. This inspection shall be conducted to identify and deter sexual abuse and sexual harassment.

Staff, Security Shift Corporal and above, Unit Managers, and /or the Administration Duty Officer, conduct and document unannounced rounds to identify and deter sexual abuse and sexual harassment. Unannounced PREA rounds are to be documented each shift daily. Each unit/program area logbook is annotated with "Unannounced PREA Inspection/Security Check."

The auditing team selected random housing unit logbook entries during various shifts and days of the week throughout the review period for confirmation of documentation the Unannounced PREA Inspections. The review confirmed the appropriate rounds were documented daily at various times during each shift in accordance with the standard provision.

	<p>The agency policies also note any staff member alerting other staff members that these unannounced rounds are occurring will be subject to appropriate disciplinary action.</p> <p>Interviews with supervisory staff to include Major, Unit Manager, and Shift Commander, indicated unannounced rounds are alternated at various times daily that prevents staff and the inmate population anticipation of their arrival. Any staff identified as alerting others of their prior arrival in any area would receive counseling followed by possible disciplinary actions for continued occurrences.</p> <p>Based on the review of agency policy, documented staffing plan that includes the standard provision, supervisory unannounced PREA rounds, SART meeting minutes, security daily rosters that support compliance with the staffing planning, observation of staffing level during site visit, and interviews with staff and the inmates, WTRC does meet all provisions of the standard.</p>
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115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 506.14.2 Housing, Programming of Youth Inmates (Effective 11/30/2018) 3. Review of Inmate Rosters 4. Memorandum 5. Interview with the following: <ol style="list-style-type: none"> a. WTRC Chief Counselor <p>115.14 (a) TDOC 506.14.2 Housing and Programming of Juvenile Offenders outlines the TDOC policy for housing and programs for youthful offenders throughout the Agency. The policy defines juvenile offenders as persons between the ages of 16 and 18 who are sentenced and committed to the TDOC by a court having adult criminal jurisdiction.</p> <p>TDOC 506.14.2 identify the following facilities for the housing of juvenile offenders subsequent to classification: males are assigned to the TDOC Northwest Correctional Complex – Site #2, and the TDOC Lois DeBerry Special Needs Facility for males with health or mental health concerns. Female juvenile offenders are assigned to the TDOC Debra K. Johson Rehabilitation Center.</p>

	<p>An interview with the WTRC Chief Counselor, review of memorandum submitted by the WTRC Associate Warden (T)/PREA Coordinator and the auditing team's review of the inmate population roster that included their date of birth confirmed no individuals under the age of 18 were assigned at the facility.</p> <p>Therefore, standard provisions a, b, and c are not applicable.</p> <p>Based on agency policy, inmate roster, site observation and interview with staff, the facility does not have house youth under the age of 18. Therefore, WTRC does meet all provisions of standard.</p>
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115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 506.06 Searches (Effective 08/01/2021) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/24) 4. TDOC Index 506.06 Searches Change Notice (08/19/2024) 5. WTRC 506.6-1 Searches (Effective 08/15/2024) 6. Basic Correctional Officers Training Program Curriculum (BCOT-1-07) Lesson Plan Personal Searches FY 2024 -2025 7. TDOC 113.37 Gender Accommodation (12/15/2022) 8. TDOC 113.37 Clinical Services Intervention for Gender Dysphoria (6/27/2024) 9. TDOC Index 112.08 Personal Hygiene Resources for Inmates (Effective 06/15/2020) 10. WTRC Index 112.08.1 Personal Hygiene Resources for Inmates (Effective 08/01/2023) 11. TDOC 506.06 Personal Searches Powerpoint Lesson Plan 12. TDOC 305.02 Employee/Offender Interaction 13. Documentation of Search Training 14. WTRC Post Orders 15. Opposite Gender Announcement Signs

16. Site Observation

17. Interviews with:

a. Staff

b. Formal and Informal Inmate Interviews

115.15(a) TDOC Index 506.06 states female correctional officers may frisk search inmates of both genders. Male correctional officers may frisk search only male inmates. Strip searches will only be conducted by staff members of the same gender. Strip/visual body cavity searches based on reasonable suspicion/probable cause require the completion of a CR-2156 by the Warden/Superintendent/designee.

WTRC 506.06.1 notes all inmates will be searched by staff of the same gender. WTRC is designated as a female only facility.

TDOC Index 502.06 policy change notice 24-12 states the requirement for body imaging/body scanners to be used on inmates for the purposes of detecting contraband and weapons with TDOC facilities for the safety and security of staff, inmates, and members of the community. Cross-gender viewing of screened images is not permitted unless approved in advance by the Assistant Commissioner of Prison Operations. In these instances, the Warden/Superintendent must be able to articulate the circumstances that pose imminent harm to others, property, or jeopardizes state or nation security interests. All cross-gender viewing must be reported in writing to the Assistant Commissioner of Prison Operations, no later than the closure of business.

BCOT-1-07 Personal Searches and FY 23-24 Personal Searches Training 506.06 includes procedures for conducting searches of transgender and transexual individuals; frisk search; strip search/visual body cavity search; search proper /clothing; body orifice security scanner chair (BOSS); gender dysphoria and personal searches; cross gender searches. The lesson plans note there shall be no cross-gender strip searches of visual body cavity searches.

The WTRC PAQ reports there were zero cross-gender strip or cross-gender visual body cavity searches of inmates during the 12-month review to include by medical and non-medical staff.

The auditing team reviewed all areas where visual searches are authorized to be conducted and confirmed the identified areas that included inmate visitation, intake area, and segregation provided privacy in designated areas behind doors. Opposite -gender supervisors are not required to supervise or observe strip searches.

115.15(b) TDOC Index 506.06-1 states, "Female correctional officers may frisk search inmates of both genders." However, female security staff may conduct visual searches of male inmates upon being identified as transgender and/or intersex at the inmate's request. Male correctional officers may only frisk search and conduct a visual search of male inmates.

The PAQ noted the number of pat-down searches of female inmates that were conducted by male staff as zero. Additionally, the PAQ noted the number of pat-down searches of female inmates conducted by male staff that did not involve exigent circumstance(s) as zero.

Per interviews with random staff, female staff are assigned on all shifts and there are never any circumstances where they are not available to conduct searches on the female inmates and or those identified as transgender who request a female. Therefore, the inmate population are never denied access to programs or out-of-cell opportunities due to no available female staff to conduct their searches.

Interviews with 42 inmates to include the random and targeted group, stated they are only search by female staff and there has never been an occasion where they were prohibited from participating in out of cell activities and/or programs out of the housing unit due to no available female staff to conduct a search.

Interviews with three (3) transgenders stated their pat searches and strip searches are conducted by female security staff only. Each stated they had not requested to be searched by male security staff.

115.15 (c) Per TDOC 502.06 states Female correctional officers may frisk search inmates of both genders. WTRC houses a female population only in addition to those who are identified as transgender.

Documentation of cross-gender strip searches and cross-gender visual body cavity searches of all inmates and/or documentation of all cross-gender pat-down searches of female inmates was not applicable for submission as zero were reported.

115.15 (d) TDOC Index 113.37 Gender Accommodation states an inmate diagnosed with gender dysphoria, or identifying as transgender, transsexual, intersex, and gender non-conforming, conditions but without secondary sex characteristics of the desired gender shall be given an opportunity to shower separately if they communicate a request to Health Services. Health service shall complete CR—2893 to convey special accommodation and complete OMS conversation LHST.

TDOC 305.03 states, “When staff of the opposite gender enters an inmate housing unit, he/she shall announce his/her presence.”

The auditing team observed notices posted on the outer entrance of all housing unit doors that “All Opposite Gender Must Announce Upon Entry.”

The review of the WTRC Post Orders states “When staff of the opposite gender enter an inmate housing unit, he/she shall announce his /her presence.”

Confirmation of staff’s completion of PREA training via the TDOC Employee PREA Training Acknowledgement Form document the training includes “Opposite Gender must announce when entering a Pod” is inclusion of the training. Seventy-five staff acknowledgment forms were reviewed.

WTRC 112.08-1, states WTRC will ensure all male staff members announce their

presence on housing units before entering. This is to ensure inmates are able to shower, perform bodily function, and change clothing without non-medical staff of the opposite gender viewing breasts, genitalia, or buttocks except in exigent circumstances or when such viewing is incidental to routine cell checks. No officer should stand and look into inmates' cells while they are performing these functions. There will be instances where incidental viewing will happen (security checks, rounds, etc.), but staff members must use good judgment in these instances.

The site observation confirmed the facility implemented procedures that allowed inmates to shower, change clothes, and use the toilet without being viewed by staff of the opposite gender by the structural operational planning that allow inmates to shower, change clothes, and use the toilet without being viewed by staff of the opposite gender. All housing units were observed to have single use showers behind full doors with the installation of a small window for security purposes that allow viewing of the occupants' head from a distance for security concerns.

Toilets within the inmate's cells were staged behind a door that prevented accidental viewing and required staff to put forth an intentional effort of viewing within the cell. Inmate's restrooms in the various program and operational departments are within a single-use restroom enclosed by a full-size door where the entry and exiting are observant and monitored by the assigned staff.

The auditing team observed the electronic surveillance monitoring areas in the control room where staff monitor live and recorded video feeds. A review of the video monitoring equipment and placement of cameras within housing units confirmed staff did not have the observation of inmates during showering, change of clothing and/or performing bodily functions. There were no inconsistencies in the procedures/practices identified.

The auditing team observed 12 observations cells located within the infirmary designated for inmates assigned on medical and/or mental health observation. A memorandum drafted by the WTRC Warden identified the security post assignment as "Female Only." The installation of privacy screens prevented cross-gender viewing.

Interviews with three (3) transgenders indicated they were aware of their opportunity to shower separately from other inmates. However, each stated as the showers are enclosed separately that allow total privacy, neither had encountered any safety or privacy concerns and therefore they had not requested to shower at a separate time from others.

Interviews with 15 random staff acknowledged the opposite gender staff (male) announcement is made when entering the inmate housing units by the entering male staff member. All staff acknowledged the inmate population are able to dress, shower and use the toilet without being viewed by the staff of the opposite gender.

Interviews with the 42 inmates selected during the random and targeted groups in addition to informal inmate interviews indicated staff of the opposite gender (male) announce themselves when entering housing units and the announcements are made in manner that can be heard throughout. Zero inmates expressed concerns of being

nude or in full view of opposite gender staff (male) during showering, change of clothing, or use of the toilets.

115.15 (e) TDOC Index 506.06 Searches outlines the mandate regarding searches of transgender and intersex inmates and states “No inmate will be searched solely for the purpose of determining the inmates’ gender. If there is uncertainty as to a person’s gender, the responsible officer shall use best judgment as to how the person presents, as male or female, and shall arrange for an officer of the gender to conduct the search. If the subject of the search, then objects on the basis of gender, an officer of the person’s apparently preferred gender shall conduct the search.”

TDOC 502.06 states, no inmate shall be searched solely for the purpose of determining gender status or condition, such as intersex, transgender.

TDOC 113.37 states staff shall not physically examine or search a transgender or intersex inmate for the sole purpose of determining the inmate’s phenotype status. If unknown, an inmate’s genital status may be determined through conversation with the inmate, review of medical records, or as part of a broader examination conducted in private by a physician or APN.

The BCOT -1-07 includes the mandate of strip searches of transgender and intersex individuals are outlined in TDOC 506.06.

Interviews with 15 random staff acknowledged the agency and facility prohibits staff from searching or physically examining transgender or intersex inmates for the sole purpose of determining genital status and under no circumstances would they be completed.

115.15(f) TDOC Index 506.06 Searches identifies: Security staff shall be trained on how to conduct cross-gender frisk searches and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

The Tennessee Correctional Academy Basic Correctional Officer Training Program Curriculum BCOT-10-7 Personal Searches is a two-hour course that outlines step-by-step instructions for the following: Searching Transgender and Transexual Individuals; Frisk Search, Strip Search; Visual Body Cavity Search; Gender Dysphoria and Personal Searches; Cross-gender Searches. The definitions of Gender Dysphoria and Intersex Conditions are included in the lesson plan and outlines skills practice/evaluation. The training topics, including definitions, were found to be consistent with the definitions contained in the standards. Search training is conducted during new hire orientation training and additional search training is conducted during annual security staff training at the facility. The training includes the mandate of strip searches of transgender and intersex individuals are outlined in TDOC 506.06. All class participants are required to participate in a skill practice section while paired with a staff member of the same sex. The lesson plan includes “Inmates may not be searched solely for the purpose of determining gender.”

The FY 23-24 Search Training PowerPoint includes the types of searches, frisk search,

	<p>strip search, visual body cavity for each body search, procedures for the Body Orifice Security Scan chair. The instructions are gender specific, that includes inmates identified as gender dysphoria, transgender and identify prohibited cross-gender searches. Slide #19 notes "Inmates may not be searched solely for the purpose of determining gender."</p> <p>The facility noted 100% of staff have received the appropriate training. Staff rosters that included staff signatures acknowledging receipt of training in conducting cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner, consistent with security needs. Random staff interviews indicated they received training regarding cross gender, transgender, and intersex search procedures. Staff indicated all strip searches are conducted in the presence of two staff members of the same sex and or for those identified as transgender by the two staff of the gender requested. Documentation of staff completion of Search Training was provided for review. Confirmation of training is monitored and maintained by the agency training staff.</p> <p>Based on the review of agency and agency policies, Search Lesson Plan, BCOT 1-07 Curriculum and TDOC Refresher Training, confirmation of staff search training via rosters, specific duties outlined in security staff post orders, observation during site visit, interviews with staff and inmates, the facility has demonstrated compliance with all the provisions of this standard.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06 PREA Implementation, Education, and Compliance (Effective 08-01-2020) 3. TDOC 502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 4. WTRC Limited English Proficiency Access to Program and Activities (As required by the Civil Rights Act Of 1964) (Effective 02/12/2024) 5. TDOC Index 103.10.1 Title VI - Limited English Proficiency (LEP) (Effective 02-01-2019) 6. TDOC Program Curriculum HR-5-04 Title VI (FY 23-24) 7. Sign Language and Interpreter Services Instructions to All WTRC Staff

8. PREA Brochures in English and Spanish

9. PREA Educational Video (ASL, Closed Caption, English, Spanish)

10. TDOC Inmates with Hearing Disabilities

11. Translation Services Contract

12. Documentation of Completed Interpretation Service

13. Confirmation of Staff Title VI Training

14. Use of Contracting Agency Translation Service

15. Site Observation

16. Interviews with:

a. Agency Head Designee

b. Random Staff

c. Targeted Group Inmate Population

115.16 (a) Per an interview with the Agency Head Designee, the agency has established procedures to provide inmates with disabilities and inmates who are limited English proficient equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and responds to sexual abuse and sexual harassment. While, these programs can always be strengthened, TDOC strives to ensure that all offenders regardless of disability or ability to speak English are afforded equal opportunities to all aspects of the agency's PREA program. Contracts exist for medical, mental health and translation services to provide services to these offenders. Offenders are identified at orientation with a particular need and are given information related to issues they might experience related to PREA. For someone who has identified physical or mental health issues, medical and mental health monitor and meet with those individual regularly to ensure they have equal access to programs especially PREA. Modifications are made to ensure that the offender understands (i.e. sign language for deaf inmates). For the LEP offenders, there are state contractual agreements for service in addition to in-house staff translators available to translate in various languages.

The agency has established an Interagency Agreement between the State of Tennessee Department of Corrections and University of Tennessee - Tennessee Language Center effective June 1, 2023, through June 30, 2025, to provide Live and Documented Translation Services. The written contract does not include ASL services available 24-7 for deaf inmates, however the services were documented as part of the contract through email confirmation between the TDOC Contracting Staff and the authorized contracting agency representative.

TDOC Index 502.06 states Each facility shall take appropriate steps to ensure that inmates with disabilities (including inmates who are deaf or hard of hearing, those

who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities) have an equal opportunity to participate in or benefit from all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

TDOC Index 103.10.1 has established guidelines in accordance with Title IV Civil Right Act of 1964 and Executive Order 13166 by taking reasonable steps to provide meaningful access to programs and activities to Limited English Proficiency (LEP) persons to ensure language does not prevent staff from effectively communicating with LEP person who are under the jurisdiction of the TDOC. Procedures outline all institution and community offices shall ensure that individuals who have a Limited English Proficiency (LEP) have access to program and activity as required in Title IV of the Civil Right Act of 1964.

TDOC Index 103.10.1 policy indicates that an assessment during the intake process will determine if the inmate requires language or literacy assistance. The review of "Plan for Providing Inmates with Limited English Proficiency Access to Programs and Activities (As required by the Civil Rights Act of 64)" outlines the specifics for ensuring methods are identified for communicating with inmates who are LEP. The plan identifies the duties of staff within the various facility departments to include but not limited to medical/mental health services, classification assignment and hearing; disciplinary procedures, grievance procedures, education /programs. Housing assignment, court appearances, parole hearings program availability.

TDOC Index 103.10.1 notes two (2) procedures in which interpretation services shall be provided: 1) Interpretation includes telephonic interpretation: Interpreting services provided via telephone. 2) In-Person (Live) Interpretation: Interpreting services provided face-to-face between an interpreter and a non-English speaking individual is a procedure utilized to provide translation services. During the intake process, offender requiring language or literacy assistance will be offered the Language Identification ("I Speak") Guide to determine if the offender has a literacy or language deficiency.

TDOC mandate staff completion of Title IV training. Staff receive the training during new hire orientation and annually during in-service training in a classroom session. The documentation regarding the staff's completion of Title IV training was confirmed via staff acknowledgment of receiving and understanding the training received on attendance rosters CR-2245.

The Tennessee Language Center Video Relay Interpreting services and the Tennessee Language Center Telephonic Interpretation were identified as available to aid in providing PREA education to the inmate population as applicable to their disability.

The auditing team observed the AVAZA posters and Language Identification Flash Cards posted in the intake area that allow inmates to identify their language from a variety of languages to include Spanish and Sign Language. English, Spanish was identified as the most common language spoken by the inmate population. One (1) inmate identified her first language as Amharic. Documentation of translation services was provided for the inmate.

The WTRC Limited English Proficiency (LEP) Plan documents the facility's obligation to provide appropriate services to inmate identified as Limited English Proficiency. The Plan includes a list of staff who are bilingual and provide translation services in the Spanish language as needed for the inmate population. The WTRC LEP Plan is updated annually and was noted as revised February 2024.

In addition to designated staff to provide translation services for inmates identified as LEP, the agency has established a contract with the University of Tennessee Language Center, to provide qualified language interpreter services for non-native English-speaking inmates. Confirmation of services provided for translation services was presented for review by the auditing team.

A memorandum drafted by the Associate Warden (T) was forward to all WTRC staff that include detailed instructions for staff utilization to provide Sign Language Interpretation Services via computer and Language Line Interpretation Service via phone as needed for inmate population with hearing disability and/or translation services for those inmates identified as LEP.

Posters identified as "TDOC Inmates with Hearing Disabilities" were posted in all housing units and throughout the facility all program areas and operational departments. The posters noted "To ensure effective communication with inmate who have a hearing disability, the TDOC will provide appropriate auxiliary aids, and services free of charge, such a s qualified sign language interpreters and oral transliterators, TTYs, videophones, note-takers, computer-assisted real time transcription services, written materials, telephone handset amplifiers, assistive listening devices, and systems, telephones compatible with hearing aids, closed caption decoders or TVs with built-in captioning, and open use of in TDOC programs, activities and services."

The auditing team observed the TTDY were stored in housing units 9 and 10 available upon the arrival of inmates identified as deaf. There were zero inmates identified as deaf at the facility throughout the 12-month review period and/or during the site observation.

The auditing team observed the PREA educational video created by the National PREA Resource available in English, Closed Caption, Spanish and ASL as identified as utilized by staff during the orientation process.

Continuous PREA educational material was observed posted on bulletin boards and walls throughout the facility in all housing units, programming and operational areas in both English and Spanish. The PREA related information created by the facility was posted on bright pink paper that was easily identified with in a font format that enabled those with low vision to view from a reasonable distance. The postings were positioned on the bulletin boards at an eye level for easy viewing accessibility.

An interview with the Chief Counselor indicated during the intake and orientation process all inmates are asked if they can read and understand the PREA information being provided to them both verbally and in writing. Regardless of their response, staff are required to verbally review the information with each inmate as some may

not acknowledge their disability to read.

The facility identified 13 inmates as hard of hearing on the first day of the site observation. All were identified as having been issued hearing aids. Zero was identified as deaf. One was selected for an interview and stated the hearing aid enables them to hear without difficulty. They were able to view and hear the educational PREA video that was also shown in Closed Caption during intake and is installed on the tablets. They were also able to understand staff's discussion of PREA information during orientation on various ways to how to report. They have no difficulty in reading and understanding the written PREA information in the handbook and posted throughout the facility on bulletin boards.

The auditing team observed notices (Hearing Impaired) on the outer cell door of inmates identified as hard of hearing to ensure appropriate communication efforts and safety enhancement in case of emergencies.

The facility identified 15 inmates visually impaired and zero as blind on the first day of the site observation. One (1) was selected for an interview and stated their issued prescription eyewear aids them in seeing without difficulty. They were able to observe the PREA video during intake and on the inmate tablet without difficulty in addition to the PREA information on the bulletin boards.

The facility identified 68 inmates with disabilities that included physical and medical disabilities on the first day of the site observation. Two (2) were interviewed by the auditing team. Both indicated they were provided with PREA education upon their arrival during intake and attending orientation verbally and in written format that they could understand. Each also acknowledged awareness of the PREA information posted throughout the facility, and methods report on the bulletin boards, phones and tablets.

The facility identified 46 inmates with cognitive or functional disabilities on the first day of the site observation. One (1) was selected for interview and indicated their observance of the PREA video during orientation and on the tablet, receiving a facility handbook with PREA information and staff discussion while understanding all.

The auditing team confirmed PREA education is provided in formats and/or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, hard hearing, physical disabled, those with limited reading skill, blind or low vision in the manners of written, verbal, and/or observation via the PREA video and PREA posters that they can understand.

115.16 (b) TDOC 502.06 states Facility staff take reasonable step to ensure meaningful access to all aspects of TDOC's effort to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptive and expressively, using any necessary specialized vocabulary.

TDOC Program Curriculum HR—5-04 Title VI requires information and services to be

provided in languages other than English when significant, numbers of beneficiaries are of limited English -speaking ability.

The auditing team observed the AVAZA posters and Language Identification Flash Cards posted in the intake area that allow inmates to identify their language from a variety of languages to include Spanish and Sign Language. English, Spanish was identified as the most common language spoken by the inmate population.

Translation services were not applicable for those inmates whom first language was Spanish, as they were also fluent in the English language. One (1) inmate identified her first language as Amharic. Documentation of translation services was provided for the inmate.

The WTRC Limited English Proficiency (LEP) Plan documents the facility's obligation to provide appropriate services to inmate identified as Limited English Proficiency. The Plan includes a list of staff who are bilingual and provide translation services in the Spanish language as needed for the inmate population. The WTRC LEP Plan is updated annually and was noted as revised February 2024. Staff identified within the LEP Plan provide translation services as needed to include intake, orientation and risk screenings. This was confirmed during an interview with a staff member identified for such.

WTRC Inmate Rules and Regulations Handbook was observed available to the inmate population in Spanish and English. Continuous PREA educational material was observed posted on bulletin boards and walls throughout the facility in housing units, program and operational departments that included how to report in both English and Spanish.

In addition to designated staff to provide translation services for inmates identified as LEP, the agency has established a contract with the University of Tennessee Language Center, that provide qualified language interpreter services for non-native English-speaking inmates.

The auditing team tested reporting and victim advocacy services available to the inmate population via the use of the phones and tablets. The recorded messages on the inmate housing unit phones and tablets included how to report sexual abuse and access to the sexual assault center was available in the Spanish language.

The auditing team conducted an interview with one (1) inmate identified as Limited English Proficient (Spanish). Translation services were provided by a staff member. The inmate acknowledged receiving the facility handbook with PREA information in the Spanish language in addition to observing the PREA posters, informational flyers and information on the phones and tablets that they understand. The LEP inmate also acknowledged they were provided with translation services during the risk screening and medical intake process.

115.16 (c) TDOC Index 502.06 states, Staff must not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances, such as when an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-responder duties or the

	<p>investigation of the inmate's allegation. A contact note, using code LCDG is posted in OMS, identifying the name of the assistor/interpreter and their organization.</p> <p>Per the PAQ , the number of instances where inmate interpreters, readers, or other types of inmate assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations within the 12 -month review was zero. :</p> <p>Interviews with 15 random staff indicated they would not utilize an inmate to translate for another inmate while reporting sexual abuse or sexual harassment. Staff were aware of staff who provide Spanish translation interpretation and the available translation services by the Tennessee Language Center that would be arranged.</p> <p>Based on the review of policies, staff training, available resources for translation services to include staff and interagency contract for interpretation, site observation, and interviews with staff and inmates, the facility has demonstrated compliance with all the provisions of this standard.</p>
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115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 301.04 Job Requirements (Effective 03-15-2023) 3. TDOC PREA Self Declaration Forms 4. Hiring and Promotional Records 5. TDOC Staff, Contractors, and Volunteers' Criminal History Background Records 6. Previous Employee Information Request Tracking Log 7. Interviews with: <ol style="list-style-type: none"> a. WTRC Human Resource Administrator b. WTRC Religious Services Chaplain c. Central Office Director of Religious and Volunteer Services <p>115.17(a) (b) (c) (d) Per TDOC Index 301.04, After a conditional offer of employment is made, a National Crime Information Center (NIC) criminal history check shall be</p>

conducted on all prospective departmental, contract and TRICOR employees, who are assigned to TDOC facilities and work locations, and fingerprints shall be taken and processed on all new or prospective staff assigned to safety-sensitive positions. The NCIC criminal history record check shall be conducted prior to employment. Such inquiries will be made to determine whether there is past or pending criminal matters that would adversely impact the TDOC's mission.

TDOC Index 301.04 states All applicants for employment or promotions, all contract employees, and all volunteers who may have any contact with offenders, shall sign PREA Self-Declaration for Sexual Abuse /Sexual Harassment, CR-3819 to ensure compliance with PREA Standard #115.17 which states the agency shall not hire or promote anyone who may have contact with inmates and shall not enlist the services of any contractor, who may have contact with inmates. who: a) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution. b) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse, or;) (c) Has been civilly or administratively, adjudicated to have engaged in activity described in (b) above. d) The Department shall consider any incident of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. A review of the policy confirms compliance of the provision.

The facility reported 178 TDOC staff, 90 contractors and 172 volunteers. The PAQ noted, 108 staff were hired who may have contact with inmates who have had criminal background record checks during the 12-month review period. The WTRC PREA Compliance Manager later identified the correct number of TDOC new hires as 25. Contractors are not hired by TDOC.

The facility reported four (4) staff were promoted during the 12-month review period.

The PAQ noted 19 contract services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmates. The WTRC PREA Compliance Manager later identified the correct number of contracts as six (6). The contracts were identified as Centurion (medical and mental health), Aramark, GEO, Christopher Pugh, TCAT, and Persevere. Per the Human Resource Administrator, although the contractors are employed through their respective agencies, the WTRC human resource staff conduct all background checks and notify their agency when the contractor has received clearance for employment at the facility.

Per the Human Resource Administrator, staff utilize the NCIC program for all background investigations for all TDOC new hires and contract workers after a conditional offer of employment is made. Additionally, all applicants are also required to complete a PREA Self-Declaration for Sexual Abuse/Sexual Harassment, CR-3819 for submission prior to the interview and the conditional offer.

Annual background checks for all TDOC staff are conducted during the staff's birthday month. Annual background checks for all contract staff to include Centurion (medical,

mental health), GEO, TCAT, Christopher Pugh, and Persevere, and Aramark are conducted throughout the month of July.

Per the Human Resource Administrator, applicants are also required to complete the PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 with their application which is required before the submission for a background check. In addition to new hires, all current TDOC staff are required to complete the PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 annually in conjunction with their annual background check that is completed during their birth month. Contract staff are required to submit a new PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 form each July during their annual background check.

The facility reported 172 volunteers were approved to provide services for the inmate population at WTRC. Per an interview with the Director of Religious and Volunteer Services, the background checks for volunteers are completed through the Central Office for all volunteers to include those entering for special events only. Additionally, all are required to complete a PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819. Electronic signatures are available. The current procedure recently changed as it was previously the responsibility of the respective WTRC facility's Religious Service Chaplains to ensure the background checks and submission of the PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 were completed in accordance with the agency policy.

The Human Resource Administrator further stated, all staff to include TDOC, contractors and volunteers are required to complete a new PREA Self-Declaration of Sexual Abuse/Sexual Harassment questionnaire during new hire, and annually during their annual background checks. Additionally, prior to staff's consideration for a promotion and entry for the interview, each applicant is required to complete an updated PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819. The submission of false information will result in disqualification and/or termination for all staff.

The following background checks were submitted for review: Five (5) TDOC new hires; Four (4) TDOC staff promotions; Aramark - seven (7) new hires; Centurion (medical and mental health) - 16 new hires; in addition to 15 volunteers. The review of the staff personnel files confirmed a criminal background check was performed for each of the requested applicants. There were no discrepancies noted in the timeliness of the background checks.

115.17 (e) TDOC Index 301.04 indicates current employees will be required to submit to an annual background check. The check is to be completed by the end of the month in which the employee's birth date occurs. The Human Resources Office for each TDOC work location will be responsible for compiling a monthly list of employees who have birthdays within each month. TDOC utilized the NCIC to conduct all background investigations for new hires and annually for current staff. An annual background check is completed on all TDOC staff during their birth month. Staff are required to acknowledge that an annual background check is required to be completed annually during their birth month, notification to the affected staff

members is not required. However, staff are required to submit an annual PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 to ensure compliance with the PREA Standard during their birth month and in the event, they are seeking a promotion.

Confirmation of annual background checks in accordance with the agency policy was provided through review of the following: Four (4) TDOC staff; Five (5) Aramark; Seven (7) medical and mental health staff. Documentation supported a criminal background investigations were completed through the NCIC for each was conducted within the review period and staff's established employment with the agency. Therefore, the review confirmed the agency's policy compliance of the standard provision requirement that criminal background record checks be conducted at least every five years for current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees.

115.17 (f) TDOC Index 301.04 indicates all applicants for employment or promotions, all contract employees, and all volunteers who may have any contact with offenders shall sign PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 to ensure compliance with PREA Standard 115.17. Assigned employees who have substantiated PREA complaints against them for sexual harassment or abuse must acknowledge such each year on their CR-3819 and whenever they apply for advancement. The PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 requires staff to respond to the following questions: a) Has engage in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution? b) 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? c) Have you ever been civilly or administratively adjudicated to have engaged in sexual activity, sexual abuse, or sexual harassment? Per the Human Resource Administrator, the PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819, is a section of the application process for new hires and an annual requirement of all TDOC staff, contact and volunteers in addition to a current employee who apply for a promotion. If an individual provides incorrect information in response to the PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819, they would automatically be disqualified for consideration of employment. All staff seeking a promotion are required complete a new PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 prior to entering for the interview. She further stated, the agency imposes upon employees a continuing affirmative duty to disclose any such misconduct. Staff are required to immediately report any arrest within 24 hours and/or prior to their next shift directly to the Warden.

The auditing team confirmed the submission of completed PREA Self Declaration for Sexual Abuse /Sexual Harassment, CR-3819, through the review of the following personnel files for each of the staff selected for new hires, request for staff promotion, and during the annual background checks that included the following: Four (4) TDOC new hires; TDOC staff promotions – six (6); Aramark - seven (7) new hires and five (5) annual; Centurion (medical and mental health) – 16 new hires and seven (7) annual;

	<p>in addition to 15 volunteers. The review confirmed the agency's policy requires the consideration of any incidents of sexual abuse and sexual harassment in determining whether to hire or promote anyone who may have contact with inmates.</p> <p>115.17 (g) TDOC Index 301.04 indicates that a material omission regarding conduct described in this directive or providing materially false information may result in disqualification from further consideration for employment and shall be grounds for termination of employment. Additionally, the Self-Declaration Application Form states "I hereby certify that to the best of my knowledge and belief, all the information I provide in this form is true, complete, and made in good faith. I understand that false and fraudulent information provided herein may disqualify me from further consideration for employment and, if employed, may result in termination of employment if discovered later." This information was also identified as provided to all applicants within the pre-employment packet.</p> <p>115.17 (h) TDOC Index 301.04 states Consistent with Federal, State, and local law, the TDOC will make it that officials receiving the results of the criminal history record check will use it only for authorized purposes and will not retain or disseminate it in violation of federal statute. An interview with Human Resource Manager confirmed the agency does provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from a potential employee. The questionnaire is forwarded to the facility's OIC Investigator for completion. Upon completion, the form is returned to the inquiring facility by the human resource staff. A staff member seeking employment must give prior approval via signature for the release of information to include prior discipline. The request for information is always documented. Employees identified in a substantiated sexual harassment and/or abuse investigation would be place on a "no rehire" list. Human Resource staff forwards a referral to all applicants' previous employers requesting a work history and document when the requested information was forwarded. Documentation of human resource staff's request to applicants current and or former employees were submitted for review. The requests are forwarded and monitored for confirmation of receipt by a tracking log.</p> <p>Based on the review various departmental staff background checks that include TDOC staff, contractors and volunteers to include new hire and annual background investigations, submission of completed PREA Self-Declaration of Sexual Abuse/ Sexual Harassment, CR-3819, that is a section of the application process and required to be submitted annually by staff and when applying for promotions, WTRC does meet all provisions of the standard.</p>
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115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. WTRC Completed Pre-Audit Questionnaire (PAQ)
2. TDOC Index #108.01 Facility Construction, Renovation, and Physical Plant Maintenance (Effective 04/01/2023)
3. TDOC Index 108.02 Design and Construction (Effective 06/01/2021)
4. Interviews:
5. WTRC Warden
6. TDOC Agency Head Designee

115.18(a) (b) TDOC Index 108.01 and TDOC Index 108.02 outlines the mandates of the standard provisions.

115.18 (a) The policies notes, that when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the Department shall consider the effect of the design, acquisition, expansion, or modification upon the Department's ability to protect inmates from sexual abuse.

115.18 (b) Per the agencies policies, when installing or updating a video monitoring system, electronic surveillance system, or tother monitoring technology, the Designer shall consider the PREA impact of how such technology may enhance the TDOC's ability to protect inmates and staff from sexual abuse."

An interview with the Agency Head/Designee indicated all modifications require request and approval. Any request submitted must also account for any additional cameras or mirrors that will be necessary to add to the area to ensure sexual safety. The agency utilizes video recording systems to monitor and record activities within the facilities. This tool is utilized to cover blind spots, to verify allegations, and to hold individuals accountable for their actions.

An interview with the WTRC Warden confirmed that the facility has not initiated any structural modifications or expansions of the existing facility since the last PREA audit in 2022. However, in the event of structural modifications or expansions, consideration of the PREA requirements would be mandatory.

The facility received an upgrade of video monitoring equipment that included the installation of 360-degree monitoring cameras in each housing unit and installed cameras in the program area classrooms to increase security enhancement in the prevention of sexual abuse. The facility is equipped with 388 cameras that assist in monitoring the safety of inmates and staff.

Based on the review of agency policies, site observation, interviews and analysis, the facility has demonstrated compliance with all the provisions of this standard.

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. National Protocol for Sexual Assault Medical Forensic Examinations Adults/Adolescents (Effective 2024) 3. TDOC Office of Investigation and Compliance Evidence Operational Protocol: 08 alleged Sexual Abuse (Effective 07/27/2019) 4. TDOC 502.06 Prison Rape Elimination Act (PREA) Implementation, Education, and Compliance (Effective 08-01-2020) 5. WTRC 502.06-1 PREA Allegations, Investigations and SART (Effective 12/15/2020) 6. TDOC 502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 7. TDOC Index 502.06.3 Medical, Behavioral Health, Victim Advocacy and Community Support for PREA Victims (Effective 08/01/2020) 8. MOU with The Shelby County Rape Crisis Center 9. Shelby County Crime Victims & Rape Crisis Center Postings 10. Appointment of WTRC Victim Advocate 11. Sexual Abuse Case Files 12. Interviews with: <ol style="list-style-type: none"> a. Random Staff b. Inmates Who Reported Sexual Abuse c. WTRC Facility Victim Advocate d. Shelby County Crime Victims & Rape Crisis Center Representatives e. WTRC PREA Compliance Manager f. WTRC Health Services Administrator g. Jackson-Madison County General Hospital Charge Nurse h. WTRC Associate Warden (T)/WTRC PREA Coordinator <p>115.21 (a) (b) TDOC 502.06 states the TDOC has absolute zero tolerance towards sexual acts between staff and inmates as well as between inmates. There are no</p>

consensual sexual acts in a custodial or supervisory relationship or consensus sexual contact between inmates. All allegations of sexual abuse/sexual harassment will be reported and investigated.

TDOC index 107.01 defines the Office of Investigation and Conduct (OIC) as the Investigative Unit (IU) that performs both administrative and criminal investigations. Institutional Investigators are assigned by the OIC to each TDOC institution to conduct investigations at an institutional level. OIC Special Agent (SA) is defined as a qualified, commissioned individual assigned to the OIC who conducts both criminal and administrative investigations of matters pertaining to the TDOC.

Operational Protocol #008 dated July 27, 2019, identifies the (1) Notification and Response Procedure stating “It shall be the protocol of the Investigations Unit to appropriately respond to incidents and/or allegations of sexual abuse which occur on TDOC institutional property. When notification is made in a timely manner, Agents will respond as the situation mandates to the site of examination for the purpose of evidence collection and preservation. The Department’s response to sexual assault follows the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” dated September 2024, or the most current version. Upon notification of alleged sexual abuse within any TDOC institution, the institution shall immediately have the alleged victim examined by qualified medical personnel. After the initial examination and collection of clothing for potential evidence, the alleged victim will be transported to the nearest Emergency Room. The ER physician or SANE will perform an examination utilizing a sexual assault evidence kit provided by TBI. This kit will be retained by the ER staff until received by an IU Agent. (3) The responding Agent shall process the alleged crime scene if feasible, receive the evidence from the attending medical staff, conduct an interview with the alleged victim and suspect at the earliest convenience, and determine the appropriate action to best facilitate the investigation. (4) Upon evaluation of all information and evidence obtained, IU staff shall deliver evidence obtained from the investigation to the TBI Crime Laboratory for evaluation as possible evidence. (5) The Agent will present all evidence in the case to the appropriate District Attorney for review, adoption and prosecution of any suspects.

WTRC does not house youthful offenders.

Interviews with 15 randomly selected security and non-security staff indicated all were knowledgeable of obtaining usable physical evidence if an inmate reported sexual abuse and the actions they are required to complete as a first responder and their duty to report to their immediate supervisor who would report to the Shift Commander. All staff to include security and non-security staff, are issued and carry in their possession a PREA Action Card that lists the duties of a first responder and immediate notification to the Shift Commander.

115.21 (c) TDOC 502.06.3 indicates upon receiving a report of an alleged sexual

abuse within the 72-hour time frame members SART that includes medical staff and the OIC institution Investigator shall determine if SAFE/SANE response is indicated at an outside medical facility. If the services of an outside medical facility are determined to be warranted, the victim shall be transported by security to an outside medical facility with SAFE/SANE personnel for a forensic examination at no cost to the victim. Upon receiving a report to an alleged sexual abuse outside of the 72-hour time frame, SART members shall determine if SAFE/SANE response is indicated at an outside medical facility with SAFE/SANE personnel. The alleged victim shall be transported only to medical facilities trained and equipped with SANE personnel. If SAFE/SANE personnel cannot be made available, the forensic examination can be performed by other qualified medical practitioners. The medical member of the SART shall document the efforts to provide SANE services.

Interviews with the WTRC Associate Warden (T)/ Facility PREA Coordinator, Health Services Administrator, and the Behavioral Health Administrator, each confirmed WTRC is scheduled to utilize the Jackson-Madison County General Hospital located at 620 Skyline Drive in Jackson, TN, and/or the Regional Medical Center at Memphis located at 877 Jefferson Ave, Memphis, TN for the completion of all inmate forensic medical examination.

An interview conducted with the Jackson-Madison County General Hospital Emergency Room Charge Nurse confirmed although SANE may not be regularly scheduled each shift, a SANE may be on call and normally reports to the hospital within an hour of being notified. Additionally, as the hospital is not a crisis center in such circumstances where a SANE is not available, the medical forensic examination would be performed by other qualified medical practitioners.

An interview with the Shelby County Crime Victims & Rape Crisis Center Representative, also concerned a SANE is available to conduct forensic medical examination upon the request of any victim of sexual abuse to include the inmate population at WTRC.

The PAQ noted the number of forensic medical examinations conducted during the past 12 months and the number of exams performed by SANES/SAFEs during the past 12 months as zero. The PAQ also noted the number of exams performed by a qualified medical practitioner during the past 12 months as zero. This information was confirmed through the review of the sexual abuse investigative case files and interviews with the WTRC Health Services Administrative, Mental Health Administrator, and WTRC Compliance Manager.

115.21 (d) TDOC established a Memorandum of Understanding (MOU) with The Shelby County Crime Victims & Rape Crisis Center (CVRCC) for the TDOC Mark Luttrell Correctional Complex and the West Tennessee State Penitentiary that includes the Women Therapeutic Residential Center. The final approval signature was noted as September 9, 2015. The MOU identifies the availability of the following services: 1) Make involvement of trained sexual assault advocates a component of the standard response to a report sexual assault and/or a request for help from a survivor of sexual assault. 2) Provide for logistical needs, such as a private meeting space for

counseling session and security clearness for designated CVRCC staff. 3) Respect the nature of privileged communication between the sexual assault advocate and client; 4) Facilitate follow-up and ongoing contact between the client and sexual assault advocates, without regard to the presence of or status of an investigation. 5) Provide training for the CVRCC staff. 6) Communicate any question to the CVRCC.

CVRCC supervisory staff acknowledged awareness of the MOU established between the TDOC that includes WTRC. Per interviews with the CVRCC representatives, services for the completion of a forensic examination, victim advocacy services during the forensic examination and in addition to follow-up advocacy support services are available 24/7/365 via phone.

The available victim advocate services provided by the CVRCC was observed noted in the inmate handbook and printed on bright pink sheets of paper in bold print easily identified and posted on bulletin boards in all housing units, program and operational departments accessible to all inmates and staff in both English and Spanish. The available victim advocate services provided by the CVRCC was observed noted in the inmate handbook and printed on bright pink sheets of paper in bold print easily identified and accessible posted on bulletin boards in all housing units, program and operational departments accessible to all inmates and staff in both English and Spanish.

An interview with the Jackson-Madison County General Hospital Emergency Room Charge Nurse, stated upon the inmates' arrival in which acts of sexual assault is reported, the victim would immediately be offered the presence of a victim advocate. Upon the victim's acceptance, staff immediately contact the Wo/Men's Resource and Rape Assistance Program (W.R.A.P) who provides on-call victim advocacy services. Advocacy services would only be activated upon being accepted by the victim.

115.21 (e) TDOC Index 502.06 outline the mandate of the standard provision. A PREA Victim Advocate is made available to the alleged victim, when requested, to accompany and support the victim through the forensic medical examination and the investigation process.

A memorandum drafted by WTRC Warden identified the WTRC Associate Warden (T) as the Facility Victim Advocate. The notice was observed posted on bulletin boards accessible for viewing by staff and the inmate population. Per an interview with the WTRC Associate Warden (T) as the Facility Victim Advocate, she communicates with each victim of sexual abuse upon being reported and none has requested victim advocate services. However, as the notices of victim advocate services provided by herself and the CVRCC are posted throughout the facility, the inmates are aware of their options in obtaining advocacy services.

Per interviews with the WTRC PREA Compliance Manager, the CVRCC is an established crisis center who meets all the qualifications per the standards that are identified within the MOU and through the phone services available to the inmate population. The available services were confirmed during an interview with the representative of the CVRCC and review of history and services noted on the CVRCC's website. The CVRCC was noted as receiving the Center of Excellence Award.

	<p>Interviews with four (4) inmates who reported sexual abuse were asked if they had requested to speak with a victim advocate upon reporting. Each stated they had not, but they were aware of the services by the CVRCC and by the Facility Victim Advocate.</p> <p>115.21 (f) (g) The TDOC Office of Investigations and Conduct is responsible for conducting all administrative and criminal investigations of sexual abuse. Therefore provisions (f) and (g) are not applicable.</p> <p>115.21 (h) A facility victim advocate has been assigned who is also the WTRC Associate Warden (T)/PREA Coordinator. A Certificate of Completion of Training Titled PREA Victim Advocacy a 6.0 contact hour training course was presented by the Sexual Assault Center was presented to the staff member confirming the completion of training. The WTRC Facility Victim Advocate stated although she communicates regularly with each victim of sexual abuse upon their reporting and/or being identified in sexual abuse incidents, none have requested services as a victim advocate.</p> <p>Based on the review of agency policies, MOU between the TDOC and The CVRCC, confirmation of available services for forensic medical examination and victim advocacy services to victims of sexual abuse, sexual abuse investigative case files, appointment of facility victim advocate, and numerous interviews, the facility does meet all provisions of the standard.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigation and SART (Effective 08/01/2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 4. TDOC Index 107.01 Office of Investigation and Conduct: Unit Authority, Responsibility, Personnel Selection and Training (Effective date 09/02/2020) 5. TDOC Index 107.01 Office of Investigations and Conduct (OIC) Roles and Responsibilities (Effective date 05/09/2024) 6. PREA Allegation System (PAS) List 7. PREA Investigative Case Files 8. Interviews with:

a. WTRC Institutional Investigators and OIC Special Agent

b. Agency Head Designee

115.22 (a) (b TDOC Index 502.06.2 states, "It is the policy of the TDOC to investigate all PREA sexual abuse and sexual harassment allegations in a timely, efficient, and confidential manner in accordance with federal guideline (Title 28 CFR part 115).

TDOC Index 502.06.2 and TDOC Index 502.06 states, staff accept reports, made verbally, in writing, anonymously, and from third parties. All allegations are documented within 24 hours of becoming known to facility staff in the PREA Allegation System (PAS). These investigations are conducted within 72 hours of receiving the allegation. Sexual Assault Response Team (SART) members/ investigators who have received special training in conducting sexual abuse investigations in confinement settings investigate all allegations of sexual abuse sexual harassment promptly, thoroughly, and objectively, including third-party and anonymous reports. Investigative Unit (IU) Special Agents are contacted immediately when circumstances warrant further actions pursuant to criminal findings.

TDOC 502.06 notes It is the policy of the TDOC to provide a safe, humane, appropriately secure environment , appropriate medical and behavioral health care, victim advocacy, and community support services that are free from threat of sexual abuse and sexual harassment for all inmates, by maintaining a program of prevention, detection, response, investigation, and tracking of all alleged and substantiated sexual assaults and sexual harassment.

Interviews with the WTRC Institution Investigators and Office of Investigations and Conduct (OIC) Special Agent indicated normally the initial investigation begins on the date of the reported allegation. All allegations are documented in the PREA Allegation System within 24 hours of reporting.

The facility provided a copy of the PREA Allegation System List for the review period that identified an investigative finding was concluded for each of the reported seven (7) sexual abuse allegations, and three (3) sexual harassment allegations.

Pursuant to TDOC Index 502.06.02 and TDOC Index 502.06 in addition to interviews with the WTRC Warden, WTRC Institution Investigators and OIC Special Agent confirmed all allegations of sexual abuse and/or sexual harassment are investigated by WTRC Institution Investigators and/or OIC Special Agents within the Tennessee Department of Corrections. The WTRC Institution Investigators are authorized to conduct administrative investigations only. Upon the determination of the possible criminal acts committed, the WTRC Institution Investigator refers the allegation to the OIC Special Agent for completion. The OIC Special Agents has the legal authority to conduct both administrative and all allegations that involve potential criminal behavior for criminal prosecution. All PREA allegations to include those reported by third party, anonymously, verbally, written and/or via a drop note are investigated in the same manner. Substantiated sexual abuse allegations of criminal behavior are referred by the OIC Special Agent to the State Assistant District Attorney for prosecution. One (1) sexual abuse investigation was conducted as a criminal

investigation.

The Agency Head/Designee stated, the agency does ensure an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment. For each allegation, policy mandates that an entry be made in the PREA Allegation System. The allegation system is used to track the steps in the investigation and the results. Policy also mandates that all investigations are completed even if the offender transfers facilities or the staff member abruptly quits. When a PREA allegation is made, an investigation is completed and documented in the PREA Allegation System. Both types of investigations are completed in the same manner initially by the Institutional Investigator. After the initial response of separating and securing the victims, securing the scene and collecting evidence, both the victim and aggressor are interviewed. Corroborating evidence is sought, and a determination is made regarding the level of allegation. If the allegation could possibly be a criminal case, the case is referred to the OIC Special Agent for additional review and prosecution if applicable.

Per interviews with the OIC Special Agent and WTRC Institutional Investigators, agency policies do require an investigation of all reported allegations of sexual abuse and sexual harassment. TDOC authorizes both administrative and criminal investigations to be conducted by agency investigators.

The PAQ noted for the number of allegations of sexual abuse and sexual harassment that were received within the past 12 -months as 10.

The PAQ noted the number of allegations in the past 12 months resulting in administrative investigations as 9.

The PAQ noted in the past 12 months, the number of allegations referred to for criminal investigations was one (1). The aggressor was criminally charged with Sexual Contact with Inmate.

The auditing team reviewed the TDOC website at www.TennesseeDepartmentofCorrections. TDOC included a section regarding investigation of sexual assault and sexual misconducts. The department is dedicated to producing quality investigations of alleged sexual abuse incidents. All investigators receive specialized training specific to sexual assault in correctional institutions. The TDOC Law Enforcement Unit, in consultant with the department legal office, aggressively refer substantiated cases of sexual assault by offenders or employees to the local district attorney's office for criminal prosecution.

115.22 (c) (d) (e) TDOC Index 107.01 defines The Office of Investigation and Conduct (OIC) as a division within the TDOC which consists of Apprehension and Enforcement (AEU), Investigations Unit (IU), Security Threat Group (STG) and Special Operations Unit (SOU).

The Investigation Unit (IU) is defined as a specialized law enforcement unit of the TDOC which conducts both criminal and administrative investigations of offenses relative to or affecting the TDOC.

	<p>Institution Investigators are assigned by the OIC to each TDOC institution to conduct investigations at an institutional level. An OIC Special Agent is a qualified commissioned individual assigned to the OIC who conduct both criminal and administrative investigations of matters pertaining to TDOC.</p> <p>Therefore, TDOC is responsible for conducting all sexual abuse and sexual harassment investigations and provisions c, d, and e, are not applicable.</p> <p>Based on the review of agency policies, PREA Allegation System (PAS) List, TDOC agency's website, staff interviews, and analysis, the facility has demonstrated compliance with all applicable provisions of the standard.</p>
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115.31	Employee training
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06 PREA Implementation, Education, and Compliance (Effective 08/01/2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective October 21, 2024) 4 TDOC Index 110.01 New Employee Orientation and Pre-Service (Basic) Training (Effective 07/21/2024) 5. Tennessee Correctional Academy Program Curriculum/ PREA (Prison Rape Elimination Act) FY 24-25 6. TDOC PREA Training Via PowerPoint 7. TDOC Index 110.05 In-Service Training 8. WTRC Employee PREA Training Acknowledgement Forms 9. Confirmation of All WTRC Staff PREA Training Roster 10. Observation During Site Visit 11. Interviews with: <ol style="list-style-type: none"> a. Random and Specialized Staff <p>115.31(a) TDOC Index 110.01, outlines the mandate of new employee orientation and pre-service basic training to include all new full -time TDOC personnel, part-time</p>

employees, volunteers, contract staff and other transfer employees. The PREA course may be completed by using the TDOC curriculum or the National Institute of Corrections.

TDOC Index 502.06 states, “The Tennessee Correction Academy (TCA) is responsible for the development and distribution of the course lesson plans annually. All lesson plans or materials utilized for pre-service and in-service training on inmate sexual abuse and sexual harassment shall be approved by TDOC Statewide PREA Coordinator and TDOC General Counsel. At a minimum the training must cover the following: 1) TDOC policy on zero tolerance for sexual abuse and/or sexual harassment; 2) Staff responsibilities under TDOC policies on sexual abuse and sexual harassment, prevention, detection, proper reporting procedures, as outlined in and how to document response to allegations; 3) Inmate’s rights 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; 6) The common reactions of sexual abuse and sexual harassment victims; 7) How to detect and respond to signs of threatened, suspected, or reported sexual abuse; 8) How to avoid inappropriate relationships with inmates; 9) How to communicate effectively and professionally with inmates, including lesbian, gay, transgender, intersex, or gender nonconforming inmates; 10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The TDOC Correction Academy Program Curriculum Lesson Title PREA (Prison Rape Elimination Act) is a 2-hour utilized for Pre-Service and/ In-Service (annual training course) that exceeds the 10 topics specified in this provision. New hires include agency staff, and contractors receive PREA training during New Hire Orientation during the first week of employment at the facility prior to contact with the resident population. Staff also attend and receive additional comprehensive PREA training while attending the Tennessee Correctional Academy (TCA).

The TDOC Prison Rape Elimination Act (PREA) training course presented by the Tennessee Correction Academy for FY 24/25 is provided in a 64-page PowerPoint presentation is utilized in conjunction with the instructor’s use of the TDOC Program Curriculum. The PowerPoint presentation requires staff to complete it electronically during classroom sessions.

The training course notes the Performance Objectives is that upon successful completion of the class, the participant will be able to: 1) Name the TDOC policy that relates to zero tolerance of sexual abuse or sexual harassment; 2) Identify eight (8) of the ten (10) significant consequences discussed concerning, offenders’ rights to be free from sexual abuse and harassment; 3) Name four (4) of the five (5) vulnerable populations of Sexual Abuse and Sexual Harassment. 4) (Identify seven (7) of the nine (9) behaviors that can put the staff member at risk of crossing professional boundaries; 5) Name the three (3) appropriate mechanisms used in reporting to outside agencies.

The completion of the PREA training is monitored by the TDOC Training Specialist.

Anyone who has not completed training or may have been unable to attend for various reasons (i.e. injury, illness, schedule conflict) and would be required to make up any missed training by the required deadline.

Interviews with 15 random staff in addition to interviews with specialized staff indicated PREA training is required to be completed during the new hire orientation and annually during in-service training. Each indicated the topics of training within the standard provision are included in the agency's PREA lesson plan. Staff also acknowledged their awareness of the PREA posters and bulletins throughout the facility in housing units, program areas and operational departments.

115.31(b) TDOC Index 502.06 states, "Such training shall be tailored to the gender of the inmates at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa." TDOC PREA training courses are developed to provide appropriate training for employees assigned to both male and female correctional facilities. WTRC houses a female inmate population only.

A review of the TDOC Program Curriculum Lesson Title PREA includes limitations and instructions for both male and female staff on procedures in conducting searches of male, female, transgender and intersex individuals. The completion of additional training is not applicable.

115.31(c) TDOC 110.05 outlines the mandate of mandatory in-service training that is required for all TDOC employee shall include but not limited to Prison Rape Elimination Act (PREA) (2 hours).

TDOC 502.06 notes The Tennessee Correction Academy (TCA) will be responsible for development and distribution of the course lesson plans annually. All lesson plans or material utilized for pre-service and in-service training on inmate sexual abuse sexual abuse and sexual harassment are approved by the TDOC Statewide PREA Coordinator and TDOC General Counselor prior to implementation, that cover the 10 elements within standard provision (a).

The auditing team observed continuous PREA education posted throughout the facility on bulletin boards and walls accessible to staff and inmates. All staff are issued and carry PREA education refresher cards titled "PREA Refresher Information, Ways to Report, PREA Action Steps, Immediate Action Steps, and Internal/External PREA Reporting Options." Security staff indicated security supervisory staff often discuss PREA educational material during shift briefings.

Documentation indicated the Shift Commanders conducted PREA refresher training that include the review and discussion of agency policy TDOC Index 502.06f Prison Rape Elimination Act (PREA) each month during the shift briefings throughout the 12-month review period.

The facility provides refresher PREA training for employees annually rather than the standard provision requirement of every two years. Additionally, PREA education is located on bulletin boards and walls throughout the institution visual to all. All staff

	<p>are issued PREA refresher cards that are required to be in their possession as continuous refresher training. Documentation of refresher training was submitted review through staff acknowledgement on the TDOC Employee PREA Training Acknowledgement Form for in-service training and an electronically stored data roster identifying all TDOC and contractor's PREA training for FY 24/25.</p> <p>115.31(d) TDOC Index 502.06 states, "The TCA Department and facilities shall document, through employee signature or electronic verification, that employees understand the training they have received using Employee PREA Training Acknowledgement, CR-3965. Confirmation of staff's PREA training was supported by their signature noting "I acknowledge that I have received training on the PREA and understand the training" on the TDOC Employee PREA Training Acknowledgement Form. The facility reported 178 staff on the first day of the site observation. Confirmation of PREA training was provided for 75 TDOC employees through signatures on the Employee PREA Training Acknowledgement CR-3965 forms in which staff acknowledged their receipt of the training and understanding of the training received. The completion of the staff PREA training is monitored and maintained in the employees' training file and electronically stored in the Collaboration Training database operated by the WTRC Training Specialist. Documentation of the electronically stored data of PREA training for all WTRC staff to include contractors were provided for review by the auditing team.</p> <p>Based on the review of policies, training lesson plans, training records, interviews and analysis, the facility has demonstrated compliance of this standard. requirement.</p>
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115.32	Volunteer and contractor training
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. Tennessee Correctional Academy Program Curriculum/ PREA (Prison Rape Elimination Act) FY 24-25 3. TDOC Index 502.06 PREA Implementation, Education, and Compliance (Effective 08/01/2020) 4. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 5. TDOC Index 110.01 Pre-Service (Basic) Training and Employee Orientation (Effective 07-21-2023) 6. TDOC Index 115.01 Standards for Volunteers and Coordination of Community Involvement (Effective 07-01-2021)

7. TDOC FY24 -25 PREA Training Power Point

8. PREA Refresher Cards

9. PREA Informational Posters

10. TDOC Website

11. Contractor and Volunteer PREA Training Records and Rosters

12. Site Observation

13. Interviews with:

a. Contractors

b. Director of Religious and Volunteers Services

c. Religious Services Volunteers

d. WTRC Religious Service Chaplain

115.32 (a) (b) (c) Pursuant to TDOC 502.06 the policies outline the mandate of the standard requiring all volunteers and contractors who have contact with inmate shall be trained on their responsibilities under TDOC's sexual abuse and sexual harassment prevention, detection and response policies and procedures. Training acknowledgement for volunteers and contractors is required to be documented through signature on CR-3965. The PAQ identified the 379 contractors and volunteers as the following: 165 volunteers and 214 contractors. This number was later identified by the WTRC PREA Compliance as 172 volunteers and 90 contractors.

TDOC Index 110.01 states that part-time employees, volunteers, contract staff and other transferring employees NEO; part-time employee, volunteer, contract staff and employee who are permanent transferring from one location to another shall receive a minimum of 20 hours of work site orientation appropriate to their assignment. The TCA Curriculum for PREA will be used.

TDOC Index 502.06 states, "The Tennessee Correction Academy (TCA) is responsible for the development and distribution of the course lesson plans annually. All lesson plans or materials utilized for pre-service and in-service training on inmate sexual abuse and sexual harassment shall be approved by TDOC Statewide PREA Coordinator and TDOC General Counsel. At a minimum the training must cover the following: 1) TDOC policy on zero tolerance for sexual abuse and/or sexual harassment; 2) Staff responsibilities under TDOC policies on sexual abuse and sexual harassment, prevention, detection, proper reporting procedures, as outlined in and how to document response to allegations; 3) Inmate's rights 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; 6) The common reactions of sexual abuse and sexual harassment victims; 7) How to detect and respond to signs of threatened, suspected, or reported sexual abuse; 8) How to avoid inappropriate

relationships with inmates; 9) How to communicate effectively and professionally with inmates, including lesbian, gay, transgender, intersex, or gender nonconforming inmates; 10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The TDOC Correction Academy Program Curriculum Lesson Title PREA (Prison Rape Elimination Act) is a 2-hour utilized for Pre-Service and/ In-Service (annual training course) that exceeds the 10 topics specified in this provision. New hires include agency staff, and contractors receive PREA training during the New Hire Orientation during the first week of employment at the facility prior to contact with the inmate population. Staff also attend and receive additional comprehensive PREA training while attending the Tennessee Correctional Academy (TCA).

The TDOC Prison Rape Elimination Act (PREA) training course presented by the Tennessee Correction Academy for FY 24/25 is provided in a 64-page PowerPoint presentation is utilized in conjunction with the instructor's use of the TDOC Program Curriculum. The PowerPoint presentation requires staff to complete it electronically during classroom sessions.

The training course notes the Performance Objectives is that upon successful completion of the class, the participant will be able to: 1) Name the TDOC policy that relates to zero tolerance of sexual abuse or sexual harassment; 2) Identify eight (8) of the ten (10) significant consequences discussed concerning, offenders' rights to be free from sexual abuse and harassment; 3) Name four (4) of the five (5) vulnerable populations of Sexual Abuse and Sexual Harassment. 4) (Identify seven (7) of the nine (9) behaviors that can put the staff member at risk of crossing professional boundaries; 5) Name the three (3) appropriate mechanisms used in reporting to outside agencies.

Contract employees attend the Non-Academy Pre-service Orientation training course for new employees and annual in-service training with TDOC staff during CORE Training. In addition to attending a classroom session, staff complete the on-line PREA training course. The facility's Training Specialist is responsible for monitoring and maintaining the training records.

Vendors to include those who are scheduled for extensive projects who do not have direct contact with the inmate population, are also required to complete the PREA training and acknowledge receipt of the training via signature on the Employee PREA Training Acknowledgement, CR-3965.

Pursuant to TDOC Index 115.01, Orientation and training for volunteers is mandatory. To be considered for a position, any prospective volunteer must complete an online Volunteer Services Application at <https://www.tn.gov/correction/agency-services/volunteer-ppportunities.html>.

The TDOC Director of Religious and Volunteer Services assigned to the TDOC Central Office explained training procedures for all TDOC volunteers. Upon individuals request to serve as a volunteer, each is required to attend a live on-line training presentation via TEAM that is presented by staff assigned to the Central Office. The initial training

course consists of three-hour training that includes PREA training. The PREA training is also offered numerous times weekly throughout each month and is available to the volunteers for the completion of new volunteer and annual training. Central Office staff utilized the Distributed Application that generates reports for the monitoring of timely completion of PREA training for all agency volunteers. The volunteers also receive orientation training upon reporting to their assigned facility.

Per the WTRC Religious Services Chaplain, volunteers who enter only for a special event are also required to complete PREA training and normally arrive an hour before the event for the training session. The training is presented by the facility's Religious Services Chaplains.

The auditing team observed continuous PREA education posted throughout the facility on bulletin boards and walls accessible to staff, contractors, volunteers and inmates. All contractors and volunteers are issued and carry a PREA education refresher card titled "PREA Action Steps/ PREA Refresher that includes guidance for the following: Staff Duty to Report, Knowledge, Suspicion, Steps to follow to include immediate actions, Internal/ External PREA Reporting methods, and the definition of Intersex and Transgender.

The auditing team conducted interviews with four (4) contractors that included medical, mental health, food service (Armark), and Persevere. All indicated they received PREA training during the new hire orientation. Two (2) contractors were employed in an excess of 12 months and acknowledged they have completed PREA training during new hire and annually. The two (2) contractors who were employed for less than one year acknowledged they were required to complete the PREA training during new hire orientation. All were aware of the agency's zero tolerance for sexual abuse and sexual harassment, how to report it, and their responsibility upon becoming aware of occurrences.

Two (2) religious services volunteers were interviewed. Each confirmed their receipt of PREA training and their awareness of the agency's zero tolerance for sexual abuse and sexual harassment, how to report it, and their responsibility upon becoming aware of occurrences.

The acknowledgement of volunteers and contract employees' completion of PREA training is documented through their signature on their Employee PREA Training Acknowledgement, CR-3965, in addition to their attendance rosters notating they have received and understanding the training. Documentation of completed PREA training and understanding of the training received via the Employee PREA Training Acknowledgement, CR-3965 was provided for the 30 contractors, and 15 volunteers. Additionally, confirmation of all contractors' PREA training was provided for review via the electronically stored PREA Course Completion History Roster.

Mental health and medical staff are also required to complete specialized PREA training which is identified in standard 115.35.

Based on the review of agency policies, PREA training lesson plans, documentation of PREA training records for contractors and volunteers and interviews, the facility has demonstrated compliance with all the provisions of the standard.

115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06 PREA Implementation, Education, and Compliance (Effective 08-01-2020) 3. TDOC 502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 4. WTRC Rules and Regulations Handbook (English and Spanish) 5. Comprehensive PREA Educational Videos (Spanish/English /Closed Caption/ASL) 6. PREA Informational Postings (English and Spanish) 7. Contract for Translation Services 8. WTRC Plan for Providing Inmates with Limited English Proficiency Access to Program and Activities 9. Inmate Issued Tablets 10. "I Speak" Language Identification Guide 11. Inmate TDOC Orientation Acknowledgement Forms 12. Site Observation 13. Interviews with: <ol style="list-style-type: none"> a. WTRC Chief Counselor and Intake Counselor b. Inmate Population <p>115.33(a) TDOC Index 502.06 policies outline the mandate of the standard. All inmates entering the TDOC system shall receive verbal and written information concerning sexual abuse within 24 hours of intake at the diagnostic centers. Each facility shall take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.</p> <p>Each facility shall take appropriate steps to ensure that inmates with disabilities (including inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities) have an equal opportunity to participate in or benefit from all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.</p>

Facility staff ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skill, or who are blind or have low vision.

Per the PAQ, the number of inmates admitted during the past 12 months who were given PREA education at intake was 883.

Per interviews with staff who conduct intake with the newly arriving inmates to the TDOC and those inmates who have transferred, all inmates receive PREA education on the day of their arrival during the intake process. Inmates receive an institutional Rules and Regulation Handbook with PREA information, observe a PREA video that was developed by the National PREA Resource Center in addition to a discussion on the agency/facility zero tolerance on sexual abuse and sexual harassment is presented by staff. Inmates are given the opportunity to participate in the discussion and ask any questions they may have.

The auditing team conducted interviews with 42 inmates to include random and targeted inmates for confirmation of receiving PREA education upon their arrival during the intake process. All acknowledged receiving PREA education included receiving an orientation packet, a WTRC handbook, PREA brochure, observing the PREA video, and/or a staff discussion of PREA to include how to report sexual abuse and sexual harassment.

The inmate population acknowledged their observance of continuous PREA education posted in all housing units, programming areas, and operational areas. The inmates also reference the signage on the walls, and recordings on the phones that provide the toll-free telephone number to report sexual abuse and sexual harassment internally and externally for reporting and or victim advocacy services identified as provided by the Shelby County Rape Crisis Center. However, zero inmates reported they had elected to use *9555 to report sexually abuse and sexual harassment nor to request victim advocacy services externally by dialing *9555 to the Shelby County Rape Crisis Center.

The inmate population also identified PREA information is available on their issued tablets. The auditing team requested various inmates to demonstrate their use of tablets in accessing PREA education and how to report via completing calls internally to *9222 externally to *9555 in addition to submitting written correspondence to family and friends that was successfully completed. Inmates demonstrated their access to the tablet application "Edovo" to observe a PREA video presented by the National PREA Resource Center titled "PREA: What You Need to Know." Per the inmate population and confirmed by staff, upon the inmate's completion of the PREA training course via their tablet, a certificate of completion is issued to them.

115.33 (b) Per the PAQ the number of those inmates admitted during the past 12 months (whose length of stay in the facility was for 30 days or more) who received comprehensive education on their rights to be free from sexual abuse, sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake was 883.

115.33 (c) TDOC Index 502.06 states All inmates entering the TDOC system shall receive verbal and written information concerning sexual abuse within 24 hours of intake at the diagnostic centers.

The PAQ noted those inmates who were not educated within 30 days of intake as zero.

An interview conducted with the Chief Counselor and Intake Staff indicated upon the arrival of all inmates, in addition to each being issued a WTRC Inmate Rules and Regulations Handbook, WTRC Orientation Handbook, the inmates observe the PREA educational video that was developed by the National PREA Resource Center for Adult Intake Comprehensive Training during the initial intake process. The training is available as PREA Adult Comprehensive ASL, PREA Adult Comprehensive Closed-Captioned English, and PREA Adult Comprehensive Closed-Captioned Spanish. The auditing team observed the intake process of 12 arriving inmates and observed all were required to observe the PREA educational video.

Staff further stated all newly arriving inmates are initially assigned to the orientation unit throughout the orientation process. Upon completing the risk screening process that is conducted privately, staff assigned to conduct the risk screening, review the orientation handbook, TDOC PREA pamphlet and the WTRC Inmate Rules and Regulations Handbook with the inmate while reading the PREA educational material to each inmate to ensure their understanding of the PREA information provided and are aware of the facility's zero tolerance for sexual abuse and sexual harassment and ways to report.

115.33 (d) Per TDOC Index 502.06, Each facility shall take appropriate steps to ensure that inmates with disabilities (including, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities) have an equal opportunity to participate in or benefit from all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Orientation/Classification Assignment and Hearing are conducted by the Counseling Service Team who evaluates the ability of the offender to understand without an interpreter. If it is evident that the offender's knowledge of the English language is insufficient, then interpretation services shall be provided. The unit team will evaluate the ability of the inmate to understand the classification procedures and conduct a structural interview through an interpreter, if necessary, for understanding, and provide an explanation of the sentence structure. The Chief Counselor/Designee will conduct all classification hearings through an interpreter (if necessary) and provide an explanation of the results of the hearing and the recommendations made during the hearing.

The auditing team observed the Language Identification Flyers posted in the intake area that allow inmates to identify their language from a variety of languages to include Spanish and Sign Language. English, Spanish was identified as the most common language spoken by the inmate population. One (1) inmate identified her first language as Amharic. Documentation of translation services was provided for the inmate.

The WTRC Limited English Proficiency (LEP) Plan documents the facility's obligation to provide appropriate services to inmate identified as Limited English Proficiency. The Plan includes a list of staff who are bilingual and provide translation services in the Spanish language as needed for the inmate population. The WTRC LEP Plan is updated annually and was noted as revised February 2024.

In addition to designated staff to provide translation services for inmates identified as LEP, the agency has established a contract with the University of Tennessee Language Center, to provide qualified language interpreter services for non-native English-speaking inmates. Confirmation of services provided for translation services was presented for review by the auditing team.

The Tennessee Language Center Video Relay Interpreting services and the Tennessee Language Center Telephonic Interpretation are available to aid in providing PREA education to the inmate population as applicable to their disability.

A memorandum drafted by the Associate Warden (T) was forward to all WTRC staff that include detailed instructions for staff utilization to provide Sign Language Interpretation Services via computer and Language Line Interpretation Service via phone as needed for inmate population with hearing disability and/or translation services for those inmates identified as LEP.

Posters identified as TDOC Inmates with Hearing Disabilities were posted in all housing units and throughout the facility all program and operational department. The posters noted " to ensure effective communication with inmate who have a hearing disability, the TDOC will provide appropriate auxiliary aids, and services free of charge, such a s qualified sign language interpreters and oral transliterators, TTYs, videophones, note-takers, computer-assisted real time transcription services, written materials, telephone handset amplifiers, assistive listening devices, and systems, telephones compatible with hearing aids, closed caption decoders or TVs with built-in captioning, and open use of in TDOC programs, activities and services.

The WTRC Inmate Rules and Regulations Handbook describe sexual assault of an inmate as a prohibited act and will not be tolerated. Inmates are informed to report any fear of sexual assault from another inmate or staff to a staff member. Guidance on the preservation on physical evidence is included and the importance of reporting the assault immediately. A hotline for reporting sexual assault in available by calling *9222. To report incidents of sexual abuse to an outside resource is available by calling *9555, for The Shelby County Crime Victims & Rape Crisis Center, 1060 Madison Avenue Memphis, TN 38104.

115.33 (e) The auditing team randomly selected 47 inmates who arrived throughout the 12-month review period, for confirmation of the inmate's acknowledgement of receiving PREA education upon their arrival at WTRC. The review revealed all selected inmates acknowledged orientation included the PREA video, and receipt of the inmate handbook that included the agency's zero tolerance of sexual abuse and how to report PREA allegations. Documentation of the inmates' receipt of PREA education is securely maintained in each inmate's personal file that is maintained in secured file cabinets within the Unit Manager's Office accessible to the assigned Unit Manager

	<p>and Unit Counselor.</p> <p>115.33 (f) PREA information was observed to be continuously and readily available to the inmate population throughout the facility on walls and bulletin boards visible to staff, inmates, contractors and volunteers. PREA signage include “PREA Rape Elimination Act Zero Tolerance” posters that includes methods to report confidential and free calls in Spanish and English, to include the PREA Hotline *9222.</p> <p>Additionally, a memorandum drafted by the Associate Warden (T) was observed posted on bulletin boards in housing units, program and operational areas noting TDOC has a ZERO tolerance for sexual abuse and how to report both internally *9222, or externally *9555 to The Shelby County Crime Victims & Rape Crisis Center. The call will be confidential and TDOC will NOT record the calls. The availability of victim advocacy services offered by The Shelby County Crime Victims & Rape Crisis Center. The memorandums were posted in both English and Spanish. The information was observed printed on bright pink paper that was eye catching in a font size that was easily identified and could be read by observers in a neatly organized. manner.</p> <p>The inmate population assigned to WTRC are issued personal tablets to maintain in their possession. Inmates from various housing units demonstrated their knowledge in the use of their tablets and their accessibility to review PREA education via a PREA video presented by National PREA Resource Center. Additionally, inmates have access to report sexual abuse and sexual harassment through free confidential calls via the PREA Hotline at *9222 and/or The Shelby County Crime Victims & Rape Crisis Center at *9555 through use of their tablets. The information is presented in both English and Spanish.</p> <p>Based on the review of agency policies, LEP Plan, established contract for interpretation translation, site observations, inmate issued tablets, documentation of inmate PREA education, and interviews with staff and inmates, and site observation, the facility does meet all provisions of the standard.</p>
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115.34	Specialized training: Investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 Prison Rape Elimination Act (PREA) Allegations, Investigations, and Sexual Abuse Response Team (SART) (Effective 08/02/2020) 3. TDOC 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 4. TDOC Index 107.01 Office of Investigation and Conduct: Unit Authority,

Responsibility, Personnel Selection and Training (Effective 09/01/2020)

5. TDOC Index 107.01 Office of Investigations and Conduct (OIC) Roles and Responsibilities (Effective 05-9-2024)

6. Documentation of Specialized Training for Agency Investigators

7. Interviews with:

a. WTRC Institutional Investigator

b. Office of Investigation and Conduct (OIC) Special Agent

115.34 (a) (b) TDOC 502.06.2 and TDOC Index 502.06 outlines the mandate of the standard provision for Sexual Assault Response Team (SART) Investigations. SART members/investigators who have received special training in conducting sexual abuse investigations in confinement settings investigate all allegations of sexual abuse and sexual harassment promptly, thoroughly, and objectively, including third-party and anonymous reports. IU Special Agents are contacted immediately when circumstances warrant further actions pursuant to criminal findings

TDOC 107.01 states: All newly selected OIC Special Agents will attend and successfully complete at a minimum, an accredited law enforcement academy (e.g., Tennessee Law Enforcement Training Academy, Memphis Police Academy, Watler State Community College, etc.) or Tennessee Bureau of Investigation Basic Agent School. Newly selected Special Agents who have previously attended an eligible accredited law enforcement academy prior employment within OIC will be considered as successfully completed on a case-by-case basis.

The OIC Special Agent acknowledged his numerous years of experience as a law enforcement officer to include his former position as a Chief of Police prior to his employment with the TDOC. He also acknowledged the completion of new agent training with TDOC, and the National Institute of Corrections (NIC) Course, "PREA: Conducting Sexual Abuse in a Confinement Setting."

Interviews with WTRC Institutional Investigators indicated they have completed the specialized investigative training course presented by the NIC "PREA: Conducting Sexual Abuse in a Confinement Setting" in addition to a PREA Investigative Training course presented by the TDOC Deputy Inspector General.

A copy of the NIC training course outline was submitted for review that included the elements of the standard provision.

Interviews with the OIC Special Agent and WTRC Institution Investigators, confirmed the training received included the initial response to reports of sexual abuse, general investigative protocols interview and interrogation techniques for both victim, aggressors, non-witness interviews, evidence collection and preservation, proper use of Miranda and Garrity warnings, during administrative and criminal investigations, review of past reports and records and the determination of investigative findings.

	<p>115.34 (c) Per the PAQ, three (3) staff are approved to complete PREA allegations. This number included the WTRC Institution Investigator and the OIC Special Agent. The OIC Special Agents are assigned to the Office of Investigations and Conducts and are authorized to conduct both administrative and criminal investigations for the agency.</p> <p>The OIC Special Agent completed extensive investigative training, including criminal investigative training and serves as a sworn law enforcement officer for the TDOC. Documentation of completion of a 16-hour coursework in Sexual Assault Investigation from the Law Enforcement Innovation Center Institution for Public Services was submitted for the assigned OIC Special Agent.</p> <p>The WTRC Institution Investigators are required at a minimum to complete an approved investigative training course presented through the National Correctional Institution (NIC) PREA: "Conducting Sexual Abuse Investigations in a Confinement Setting." The facility provided training certificates for completion of the course.</p> <p>115.34 (d) The TDOC is responsible for conducting all administrative and criminal investigations to include sexual abuse. Therefore, zero allegations are referred to other State or Department of Justice entities for an investigation.</p> <p>Based on the review of agency policies, NIC PREA Investigative training course, documentation of investigators' training per standard, and interviews, the facility has demonstrated compliance with all the provisions of the standard.</p>
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115.35	Specialized training: Medical and mental health care
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06 PREA Implementation, Education and Compliance (Effective 08/01/2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 4. TDOC Index 502.06.3 Medical, Behavioral Health, Victim Advocacy, and Community Support Services for PREA Victims (Effective 08/01/2020) 5. Specialized Training PREA Medical and Mental Care Standards presented by the National PREA Resource Center 6. Medical and Mental Health Specialized Training Documentation 7. Documentation of PREA Training Pursuant to Standard 115.32

8. Interviews with:

- a. Behavioral Health Administrator
- b. Health Services Administrator

115.35 (a) TDOC Index 502.06.3 and TDOC 502.06 states all full and part-time medical and mental health care practitioners who work regularly in the facility shall be trained in: how to prevent, detect, and respond to acts of sexual abuse or sexual harassment. Medical and mental health staff are contract employees who must complete the agency's PREA training and medical and mental health specialized training received from designated supervisory instructor contract staff within the department. The policy states all full and part-time medical and mental health care practitioner who work regularly in the facility shall be trained in: (a) How to detect and assess signs of sexual abuse and sexual harassment; (b) How to preserve physical evidence of sexual abuse; (c) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; (d) How and to who report allegations or suspicions of sexual abuse and sexual harassment; (e) This training shall be documented on the TDOC training Roster, CR-2245, and copies provided to the facility training specialist.

An interview with the WRTC Behavioral Health Administrator (BHA), and WTRC Health Services Administrator (HSA) confirmed all medical and mental health staff are required to complete Specialized Training: PREA Medical and Mental Care Standards Notification of Curriculum Utilization. The Specialized Training PREA Medical and Mental Care Health Care Standard Instructors' Curriculum Guide and Lesson Plan is completed upon new hire and annually. The Behavioral Health Administrator and the Health Services Administrator present the training course to both medical and mental health staff departmental staff. The lesson plan includes four modules identified as the following: Module 1 - Detecting and Assessing Sign of Sexual Abuse and Sexual Harassment; Module 2 - Reporting; Module 3 - Effective and Professional Response; Module 4 - The Medical Forensic Examination and Evidence Preservation. Training objectives are designed to 1) Identify the signs of sexual abuse and sexual harassment; 2) Know how to respond to a trauma-informed way to survivors of sexual abuse; 3) Recognize how to preserve and collect forensic evidence; 4) Know how to report and to whom to report to.

The PAQ noted 54 medical and mental health care practitioners who work regularly at this facility received the training required by agency policy, and 100 % completed the specialized training pursuant to the standard. The number was later identified as 58 medical and mental health care practitioners were employed throughout the 12-month review period.

115.35(b) TDOC Index 502.06.3 stated upon receiving a report of an alleged sexual abuse within the 72-hour time frame SART members shall determine if SAFE/SANE response is indicated at an outside medical facility. Per interviews with medical staff, all forensic examinations are performed off-site at the Jackson-Madison County General Hospital and/or the Regional Medical Center.

	<p>115.35(c) TDOC Index 502.06.3 states all full and part-time medical and mental health care practitioners who work regularly in the facility shall be trained in: how to prevent, detect, and respond to acts of sexual abuse or sexual harassment. This training shall be documented on the TDOC Training Roster, CR-2245, and copies provided to the facility training specialist. The auditing team reviewed TDOC Training Rosters, (CR-2245) for confirmation of completed Specialized PREA training for Medical and Mental Health training for 46 medical and mental health staff.</p> <p>115.35 (d) in addition to PREA training pursuant to standard 115.32. Interviews with both the Behavioral Health Administrator and the Health Services Administrator indicated departmental staff are required to complete standard PREA training upon reporting to the facility during new employee orientation and annually. The PREA training is completed through classroom sessions and an on-line TDOC PREA training course in which all staff to include medical and mental health staff are required to complete. Confirmation of PREA training pursuant to standard 115.32 for medical and mental health staff were documented electronically via a PREA Course Completion History roster in addition to the Employee PREA Acknowledgement Forms for 30 medical and mental health staff documenting their signature acknowledging receiving and understanding the PREA training presented.</p> <p>Based on the review of the TDOC policies, the National PREA Resource Specialized title Specialized Training “PREA Medical and Mental Care Standard Notification of Curriculum Utilization December 2013,” signature confirmation PREA Specialized Training for Medical and Mental health and PREA training pursuant to standard 115.32, and staff interviews, WTRC does meet all provisions of the standard.</p>
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.1 PREA Screening, Classification, and Monitoring (Effective 08-01-2020) 3. TDOC 052.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 4. TDOC 502.06.3 Medical, Behavioral Health, Victim Advocacy, and Community Support Services for PREA Victims (Effective 08-01-2020) 5. PREA Screening System Application 6. Documentation of Inmates' Arrival Dates

7. Completed Risk Screenings

8. Observation of Intake Risk Screening Process

9. Interviews with:

a. Staff Responsible for Risk Screening

b. Random and Targeted Inmates

d. TDOC Statewide PREA Coordinator

115.41(a) (b) TDOC Index 502.06.1, TDOC 502.06 establishes policy and assigns responsibilities for screening individuals housed in a correctional facility under the authority of the TDOC to assess the risk of the individual being sexually abused or being sexually abusive towards other inmates. The agency uses the PREA Screening System Application located on the TDOC intranet to assess an inmate's risk of sexual victimization and risk of sexually abusing other inmates.

TDOC 502.06 notes the mandate for screening /assessing inmates at the diagnostic center. Classification team or unit management teams from diagnostic classification units will interview and evaluate all inmates for sexually aggressive/victims tendencies utilizing the PREA Screening System Application located on the TDOC intranet with 72 hours of arrival.

Per the PAQ, the number of inmates entering the facility (either through intake or transfer) within the past 12 months, whose length of stay in the facility was for 72 hours or more and who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility was noted as 883.

Interviews conducted with staff who conduct risk screening indicated all inmates are screened for their risk of sexual victimization and sexual abusiveness toward other inmates risk of sexually abusing other inmates on the day of their arrival to include inmates who are newly sentencing inmates, those arriving from various county jails, those inmates transferred from other TDOC correctional facilities for designation at WTRC, and those who depart the facility for an extended stay at a hospital in an excess of 24 hours. The PREA Screening System Application located on the TDOC intranet is utilized to conduct all screenings.

Interviews conducted with the inmate population who arrived within the review period indicated they were asked the risk screening questions during the initial intake on the day of arrival and again within three weeks of their arrival.

The auditing team observed the intake process during the arrival of newly committed inmates and those identified as returns and/or transfers from other TDOC facilities. Staff were observed using the PREA Screening System Application located on the TDOC intranet to assess an inmate's risk of sexual victimization and risk of sexually abusing other inmates. The risk screenings interviews were conducted in an office separated from other inmates while staff read each question in a manner that

fostered a comfort level for responses.

Inmates' individual files containing hard copies of personal and/or sensitive documentation to include orientation information were observed in the unit management office, designated Records Office and/or the Medical Records Office. Accessibility to the identified areas is limited to authorized staff only based on their job assignment responsibilities. Information stored electronically is accessible only to staff assigned to the respective departments with a personal encrypted password for security purposes.

115.41(c) (d) TDOC Index 502.06.1 and TDOC 502.06 requires authorized users to utilize the PREA Screening System Application located on the TDOC intranet. User security access to this system is authorized by the Associate Warden of Treatment. The PREA Screening System Application form is the agency-approved standardized screening instrument. Copies of the Tennessee Inmate Management Information System (E-TOMIS system) PREA Screening form were provided within the PAQ in addition to those for confirmation inmates for each month during the 12-month review period (58) randomly selected due to their arrival to the WTRC.

The TDOC PREA Screening instrument assigns a numerical point value to questions regarding their risk and/or history of victimization and/or abusiveness categories based on the responses provided by the inmate and information obtained from the inmate records. Inmates are asked to provide a response to the questions during the interview/risk screening procedures. The risk screening form is identified as the Offender Information Screening form. The risk screening instrument includes an excess of the 10 factors identified in the standard provision. Sexual Victim Factors include 1) Whether the inmate is a former victim or institutional (prison or jail) sexual abuse; 2) The inmate's own perception of vulnerability; 3) Whether the inmate is detained solely for civil immigration purposes; 4) Whether the inmate has a mental, physical, or developmental disability; 5) The age of the inmate (24 or younger or elderly, 60 or older); The physical build of the inmate (5'5 and/or less than 150 pounds; 7) Whether the inmate has previously been incarcerated; 8). Whether the inmate's criminal history is exclusively non-violent; 9) Whether the inmate has prior convictions for sex offenses against an adult or child; 10) Whether the inmate is or perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; 11) Whether the inmate has previously experience sexual victimization.

Additional Sexual Aggressor Factors included in the risk screening process include: 1) History of prior institution (jail or prison sexual abuse; 2) Prior acts of sexual abuse; 3) Prior acts of violent offenses; and 4) History of prior institution violence.

115.41(e) TDOC Index 502.06.1 notes the PREA Screening application to determine if an inmate is at risk of being abusive shall, at a minimum, consist of prior acts of sexual abuse; prior acts of violent offenses; history of prior institutional violence and prior history of institutional sexual abuse. Based on the inmate's response, of yes or no, the inmate is scored at risk for abusiveness and or as an aggressor. Confirmation of the standard provision compliance was based on the review of risk assessment

questionnaire and observation of the risk screening process during the site visit

115.41(f) TDOC 502.06 notes inmates arriving at a diagnostic center who will be excluded from a risk needs assessment still receive a PREA Screening as any other inmates entering the TDOC system. Within 30 days, the inmate will be rescreened with the PREA Screening System Application. Once an inmate has been transferred to his/her receiving institution, his/her PREA screening is rescreened. This may also be based upon any additional, relevant information received since the screening intake.

TDOC Index 502.6.3 notes within a set time period, not to exceed 30 days from the inmate's arrival of the institution, the institution will rescreen the inmate for risk of victimization or abusiveness or base upon any additional relevant information received by the facility since the screening.

TDOC Index 502.06.1 requires unit management staff to reassess each inmate within 30 days of the inmate's arrival at the facility using the PREA Screening Application.

The PAQ noted the number of inmates entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more and who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake was noted as 841, however the correct number was later identified by the WTRC PREA Compliance Manager as 820.

The Chief Counselor indicated a tracking log identified a PREA Intake Spreadsheet is maintained throughout each month. The spreadsheet maintains a tracking log of the inmates' arrival, their initial facility screening and the 30 -day rescreening dates. The reassessments are scheduled to be completed between the 25th - 30th day of the inmates' arrival. Emails reminders are forward to staff of the upcoming reassessments to prevent occurrences of non-compliance. Additionally, tracking log documents the submitted mental health referrals and date the inmates are seen.

The auditing team randomly selected the PREA Screening forms from each month during the 12-month review period for confirmation of timely risk screening within 72 hours and rescreening within 30 days for 58 inmates' arriving at WTRC. The review confirmed that all inmates received their initial risk screening on the day of arrival, and the reassessments were completed between 17 - 27 days of the inmates' arrival. Therefore, 100% of the inmates were re-screened for their risk of sexual victimization or of being sexually abusive within 30 days of the inmate's arrival and their initial assessment.

Interviews were conducted with inmates that included those arriving during the 12-month review and an excess of the review period. The inmates acknowledged they were asked questions related to the PREA Screening Application forms by Counselors within a private area/office and being asked twice within 30 days of their arrival.

115.41(g) TDOC Index 502.06.1 and TDOC 502.06 notes the requirement that unit management staff are to re-assess an inmate's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that

bears on the inmate's risk of sexual victimization or potential for abusiveness. Once an inmate is identified as a Sexual Aggressor or Sexual Victim at any time during his/her incarceration, the inmate shall be evaluated for appropriate housing and programs. If the PREA screening outcome changes an inmate's status as a Sexual Aggressor or Sexual Victim, staff must review the current cell/bed assignment of the inmate to ensure compatibility with other inmates assigned to the same cell and the new screening outcome. If a cell/bed assignment is needed, staff must notify the Associate Warden of Treatment/Deputy Superintendent/ Assistant Warden of Programs and unit management staff via email of the required move.

Interviews with the Chief Counselor, and Intake Counselors indicated an additional assessment is conducted upon receiving any additional information that could result in changes of custody level scoring, and/or other classification changes to include upon an inmate being identified as a victim of sexual abuse and/or as an aggressor in a substantiated sexual abuse investigation. The PREA Screening System Application is utilized to conduct all re-assessments. Upon an inmate's status change, the Count Room Officer is notified of the inmate's status change to ensure the proper labelling for housing assignments.

Two (2) sexual abuse investigations were concluded as substantiated during the review period. The substantiated sexual abuse investigations were identified as a staff on inmate sexual abuse. Documentation was provided that supports victim one (1) was reclassified as a victim of sexual abuse the following day of the substantiated sexual abuse investigation. The second victim was reclassified as a victim of sexual abuse within five days of the substantiated investigative findings.

115.41(h) TDOC Index 502.06.1 and TDOC 502.06 notes inmates will not be disciplined for refusing to answer or disclosing complete information in response to screening questions.

During interviews with various staff who conduct risk screening, inmates would not receive discipline for refusing to cooperate during the risk screening process. Staff indicated they have not encountered an incident in which an inmate has refused to cooperate during the risk screen assessments.

115.41(i) TDOC Index 502.06.1 and TDOC 502.06 indicates that screening information is strictly need-to-know. Access to the PREA Screening System Application is controlled through authorized user security access. User security access to the system is requested by the Associate Warden of the Treat/Deputy Superintendent/ Assistant Warden Program at privately managed facility to the TDOC Statewide PREA Coordinator. Unit Management staff will ensure screening information is entered within the PREA Screening System Application, E-TOMIS.

Per the Statewide PREA Coordinator, TDOC has outlined those staff who should have access to the inmates' risk assessments. The information must be requested through the onsite PREA Coordinator and approved at the facility level. The request is then forwarded to the Statewide PREA Coordinator, who must also vet and approve access. The decision to grant access is based on the job responsibilities of the employee. The process of approval was also identified by the WTRC Chief Counselor and WTRC PREA

	<p>Compliance Manager.</p> <p>The auditing team observed risk screening information to be securely stored within the PREA Screening System Application (Distributed Application) computerized program accessibility to authorized unit management staff through an encrypted password.</p> <p>Based on the review of agency policies, and procedures to include the review of the objective screening instrument utilized to conduct PREA risk screening that includes the provisions within the standard, documentation of timely completed initial risk screenings and reassessments, observation of the intake process to include risk screening process, interviews with staff and the inmate population, it is determined WTRC does meet all standard provisions.</p>
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 Prison Rape Elimination Act (PREA) Allegations, Investigations, and Sexual Abuse Response Team (SART) (Effective 08/02/2020) 3. TDOC 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 4. TDOC Index 107.01 Office of Investigation and Conduct: Unit Authority, Responsibility, Personnel Selection and Training (Effective 09/01/2020) 5. TDOC Index 107.01 Office of Investigations and Conduct (OIC) Roles and Responsibilities (Effective 05-9-2024) 6. Documentation of Specialized Training for Agency Investigators 7. Interviews with: <ol style="list-style-type: none"> a. WTRC Institutional Investigator b. Office of Investigation and Conduct (OIC) Special Agent <p>115.34 (a) (b) TDOC 502.06.2 and TDOC Index 502.06 outlines the mandate of the standard provision for Sexual Assault Response Team (SART) Investigations. SART members/investigators who have received special training in conducting sexual abuse investigations in confinement settings investigate all allegations of sexual abuse and sexual harassment promptly, thoroughly, and objectively, including third-party and anonymous reports. IU Special Agents are contacted immediately when circumstances warrant further actions pursuant to criminal findings</p>

TDOC 107.01 states: All newly selected OIC Special Agents will attend and successfully complete at a minimum, an accredited law enforcement academy (e.g., Tennessee Law Enforcement Training Academy, Memphis Police Academy, Watler State Community College, etc.) or Tennessee Bureau of Investigation Basic Agent School. Newly selected Special Agents who have previously attended an eligible accredited law enforcement academy prior employment within OIC will be considered as successfully completed on a case-by-case basis.

The OIC Special Agent acknowledged his numerous years of experience as a law enforcement officer to include his former position as a Chief of Police prior to his employment with the TDOC. He also acknowledged the completion of new agent training with TDOC, and the National Institute of Corrections (NIC) Course, "PREA: Conducting Sexual Abuse in a Confinement Setting."

Interviews with WTRC Institutional Investigators indicated they have completed the specialized investigative training course presented by the NIC "PREA: Conducting Sexual Abuse in a Confinement Setting" in addition to a PREA Investigative Training course presented by the TDOC Deputy Inspector General.

A copy of the NIC training course outline was submitted for review that included the elements of the standard provision.

Interviews with the OIC Special Agent and WTRC Institution Investigators, confirmed the training received included the initial response to reports of sexual abuse, general investigative protocols interview and interrogation techniques for both victim, aggressors, non-witness interviews, evidence collection and preservation, proper use of Miranda and Garrity warnings, during administrative and criminal investigations, review of past reports and records and the determination of investigative findings.

115.34 (c) Per the PAQ, three (3) staff are approved to complete PREA allegations. This number included the WTRC Institution Investigator and the OIC Special Agent. The OIC Special Agents are assigned to the Office of Investigations and Conducts and are authorized to conduct both administrative and criminal investigations for the agency.

The OIC Special Agent completed extensive investigative training, including criminal investigative training and serves as a sworn law enforcement officer for the TDOC.

Documentation of completion of a 16-hour coursework in Sexual Assault Investigation from the Law Enforcement Innovation Center Institution for Public Services was submitted for the assigned OIC Special Agent.

The WTRC Institution Investigators are required at a minimum to complete an approved investigative training course presented through the National Correctional Institution (NIC) PREA: "Conducting Sexual Abuse Investigations in a Confinement Setting." The facility provided training certificates for completion of the course.

115.34 (d) The TDOC is responsible for conducting all administrative and criminal investigations to include sexual abuse. Therefore, zero allegations are referred to other State or Department of Justice entities for an investigation.

	Based on the review of agency policies, NIC PREA Investigative training course, documentation of investigators' training per standard, and interviews, the facility has demonstrated compliance with all the provisions of the standard.
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115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08-01-2020) 3. TDOC 502.06 Prison Rape Elimination Act (PREA) (Effective 1-21-2024) 4. Segregation/Restrictive Housing Unit Logs 5. Interviews with: <ol style="list-style-type: none"> a. WTRC Warden b. Associate Warden (T)/WTRC PREA Coordinator c. Staff Who Supervise Segregation <p>115.43 (a) TDOC Index 502.06.2 and TDOC 502.06 outlines the mandate of the standard provision. Inmates at a high risk of sexual victimization may be placed in segregation/restrictive housing only after an assessment for all available alternative has been made, and then only until an alternative means of separation from likely alleged abuser(s) can be arranged.</p> <p>Per the PAQ, the number of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero. Therefore, documentation was not applicable.</p> <p>Per an interview with the Warden, inmates identified as at a high risk of sexual victimization would only be placed in segregation/restrictive housing if the inmate's life was determined to be in danger and the aggressor/threat could not be identified. Under such circumstances, the victim would be placed in protective custody pending the completion of an investigation. In other instances, alternate housing would be made to ensure separation.</p> <p>A memorandum drafted by the WTRC Associate Warden (T)/PREA Coordinator noted the facility has not yet placed an inmate at high risk of sexual victimization in involuntary segregation.</p>

115.43 (b) TDOC Index 502.06.2 and TDOC 502.06 outlines the standard provision. Inmates placed in restrictive housing for this purpose shall have access to programs, education, and work opportunities to the extent possible. If an inmate's access to program privileges, education, or work opportunities is restricted, the facility shall document what opportunities have been limited, the duration of the limitation, and the reasons for such limitations using Contact Notes LCDG in OMS.

Per the PAQ and interviews with staff who supervise segregation, and the Warden, the facility does not place inmates in segregation in relation to the standard provisions.

An interview with staff who supervise inmates in segregated housing indicated that inmates at a high risk for sexual victimization are not placed in involuntary segregated housing. However, all inmates placed in segregation are given access to program privileges to include education, legal aid, religious services material, hair care services, showers, medical and mental health services, recreation, limited personal property, incoming and outgoing mail, and their tablets in addition limited telephone accessibility. Limitations on out of cell programs are imposed due to security requirements of the segregation unit. Documentation of services provided to all inmates placed in involuntary was supported by segregation unit records, and records of staff visits to the area. Zero inmates were noted as placed in segregation based on being at a high risk of sexual victimization.

115.43 (c) TDOC Index 502.06.2 and TDOC 502.06 outlines the standard provision. The housing assignment on the placement of inmates at high risk for sexual victimization placement in segregation/restrictive housing only must not exceed a period of 30 days unless extenuating circumstances prevent the inmate being housed in an alternative method. SART will document such circumstances during the monthly SART meeting.

The PAQ noted the number of inmates at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement during the 12-month review period as zero.

Per an interview with the Associate Warden (T)/WTRC PREA Coordinator, no inmates are housed in segregation in an excess of 30 days

115.43 (d) The facility reported seven (7) sexual abuse allegations and identified zero circumstances where an inmate was placed in segregation due to being at a high risk of sexual victimization. This was confirmed during the auditing team's review each of the seven (7) sexual abuse investigations and interviews with WTRC Warden, Associate Warden (T)/WTRC PREA Coordinator and supervisory staff assigned to the segregation unit.

115.43 (e) TDOC Index 502.06.2 and TDOC 502.06 outlines the standard provision. Every 30 days, the counselor affords each such inmate a review to determine whether there is a continuing need for separation from the general population. The reviews are documented using Contact Notes LCDG in OMM.

Interviews with staff assigned to supervise segregation and the Warden indicated the

	<p>alleged victim and aggressor would be separated as the victim would remain on the compound and the alleged abuser would be placed in segregated housing pending an investigation unless the threat could not be identified and as such the victim would be placed in Protective Custody. However, no inmates are housed in segregation in an excess of 30 days</p> <p>Based on the review of the PAQ, agency policies, segregation unit logs and records, investigative case files and interviews with Warden. Associate Warden (T)/ WTRC PREA Coordinator, and staff who supervise segregation, the facility has demonstrated compliance with all the provisions of the standard.</p>
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115.51	Inmate reporting
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 506.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08-01-2020) 3. TDOC Index 502.6 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 4. WTRC Inmate Rules and Regulations Handbook 5. TDOC Index 501.01 Inmate Grievance Procedures (Effective 11/2/2022) 6. Informational Postings of the Shelby County Crime Victims & Rape Crisis Center 7. PREA Reporting Posters 8. Auditor's PREA Notice Posting 9. Completed Calls via Inmate Telephone System and Inmate Tablets 10. TDOC PREA Brochure 11. Site Observation <ol style="list-style-type: none"> a. Shelby County Crime Victims & Rape Crisis Center Representative b. Random staff c. Grievance Sergeant d. Inmate Population

115.51(a) (b) TDOC Index 502.06.2 and TDOC 502.06 outlines the mandate of the standard provisions. The Department provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse. These include but are not limited to: Reporting directly to staff; Facility PREA Tip Line; or Written communication.

TDOC Index 502.06.2 and TDOC 502.06 also outlines the mandate of the standard provision the Department provides at least one way for inmates to report abuse or harassment to an outside governmental entity that is not affiliated with the Department or that is operationally independent from the Department leadership. This information is made available to inmates through the facility inmate handbook.

The WTRC Inmate Rules and Regulations Handbook states “If assistance is needed, contact any staff member, A hotline for reporting sexual assault is available by calling *9222.

The auditing team observed PREA educational posters throughout the facility on walls within frames noting the Prison Rape Elimination Act Zero Tolerance. The poster included internal methods of reporting to staff or by dialing *9222. The call was identified as confidential and free.

TDOC index 501.01 states an inmate may submit a grievance alleging sexual abuse at any time. The auditing team observed grievance forms were accessible to the inmate population in designated areas in each of the housing units (pods) in addition mailbox depositories identified specifically for grievances. Only authorized staff have access to secure mailboxes for collection. An interview conducted with the Grievance Sergeant indicated upon the collection of the grievances, those identifying PREA allegations are logged and forwarded to the Associate Warden (T)/WTRC PREA Coordinator and the WTRC Investigators where applicable investigations are completed.

Inmates are issued to TDOC PREA brochure during the intake process that includes the following: Offenders incarcerated in TDOC facilities are encouraged to immediately report allegations of sexual abuse to correctional staff, facility administrators, the PREA TIP LINE or through the grievance process.

The facility provides inmates with writing paper noted as “Two-way Message” to communicate in writing with staff. Inmates may personally give the note to staff, place it under the staff’s office door, and/or place it in one of the available mailboxes.

Formal and informal interviews with the inmate population confirmed they have a continuous opportunity to purchase writing instruments to include note pads, ink pens, pencils and postal stamps from the inmate commissary that allows them to communicate in writing both internally and externally with others. Additionally, writing instruments are provided by the facility as needed. However, the inmates stated the majority of their correspondence is conducted through use of their tablets.

An interview with the Chief Counselor confirmed that all inmates are given a stamped envelope during the intake process to communicate in writing with individuals outside the facility.

The auditing team also observed mailboxes for the placement of internal and external mail by the inmate population. Per an interview with staff assigned to the WTRC mailroom, staff collects all mail Monday – Friday except for Federal holidays to include anonymously submitted letters. Internal mail is forwarded to the department in which the letter is addressed to. Outgoing mail is prepared for processing by the United States Post Office.

The PREA Audit Notice was observed posted on bulletin boards in all inmate housing units, site entry lobby, food service department, library, warehouse, TRICOR, education, medical and mental health, visitation and recreation. The inmate population and staff acknowledged their observance of the PREA audit notice posted throughout the facility prior to the site observation. The auditing team did not receive any request from the inmate population or staff to participate in the interview process.

The TDOC PREA brochure provided to the inmate population includes family and friends of inmates and the general public who have knowledge of sexual abuse allegations within the TDOC system are encouraged to report allegations to the TDOC Statewide PREA Coordinator TDOC Central Office 6th Floor, Rachel Jackson Building 320 Sixth Avenue North Nashville, TN 37243-0465 or (615) 253-8178.

The Lead Auditor conducted a test phone call to the TDOC third party reporting Tip Line at (615) 253-8178 during the pre-audit phase. The auditor was asked to leave a voice message with detailed information regarding the circumstances of the call. The auditor received a call from the TDOC PREA Coordinator acknowledging receipt of returned call within one hour of the initial call.

The WTRC Inmate Rules and Regulations Handbook notes “To report incidents of sexual abuse to an outside resource, you may call *9555, The Shelby County Crime Victims & Rape Crisis Center, 1060 Madison Ave, Memphis, TN 38104. The calls are confidential and TDOC will NOT record the call. The Shelby County Crime Victims & Rape Crisis Center also offers victim advocacy services.

The auditing team observed Shelby County Crime Victims & Rape Crisis Center postings on bulletin boards throughout the facility to include in all housing units, library, food service department, education, religious services, medical, mental health, recreation, operational departments, maintenance, administration, visitation, and intake. The posting read as such: TDOC has a ZERO tolerance for sexual abuse. To report incidents of sexual abuse to an outside resource, use the number *9555. This is the Shelby County Crime Victims & Rape Crisis Center (1060 Madison Ave, Memphis, TN 38104). The call will be confidential and TDOC will NOT record the call. The Shelby County Crime Victims & Rape Crisis Center also offers victim advocacy services.” This information was observed posted in English and Spanish.

The auditing team utilized the inmate housing unit phone to conduct a test call at

*9555 identified for The Shelby County Crime Victims & Rape Crisis Center. The call was immediately accepted by the Statewide Hotline Operator who confirmed calls are answered 24/7/365 where third-party reporting of sexual abuse and sexual harassment services are available. Only upon approval by the caller/inmate will the information be released to the affected facility and/or the TDOC Statewide PREA Coordinator via the Central Office PREA Tip.

The inmate population was observed to be in possession of individual agency issued tablets that allow them to place calls and/or written correspondence to individuals within and outside the facility. The auditing team requested two (2) inmates in various housing units to demonstrate their use of the tablet. The inmates were successful in completing calls for both internal and external reporting. Upon initially accessing the phone, the inmates were greeted with a recording stating to report sexual abuse or sexual harassment press *9222 for internal reporting, press *9555 for external reporting to the Sexual Assault Center. The procedures were also confirmed during the auditing team's assessment of the inmate telephone system as the call was also successfully completed. The instructions for completing the calls on the phones and tablets were available in English and Spanish.

Formal and informal interviews with the inmate population confirmed all were aware of the reporting options available while stating the internal and external PREA Hotline numbers are free. They also referenced signage posted walls and bulletin boards in addition to the messages on the inmates' phones, and tablets for calling the internal PREA Hotline and/or externally by connecting the Shelby County Crime Victims & Rape Crisis Center. Inmates were also aware of the grievance procedure to report sexual abuse and sexual harassment.

The review of the investigative case files confirmed zero inmates elected to report an allegation of sexual abuse to the Shelby County Crime Victims & Rape Crisis Center via the PREA Hotline at *9555 nor through written correspondence.

Documentation of PREA case files, medical, mental health and inmate risk screening is stored electronically accessible only to authorized staff within the specific department upon approval and the issuing of credentials for login accessibility. PREA casefiles are stored in the PREA Allegation System. Hard copies of inmate medical and mental health records are maintained in the medical records office accessible to medical and mental health staff only. Inmate records are stored in secured cabinets in the records office that is manned by assigned staff. Inmate files containing information such as inmate orientation documentation are secured in filing cabinets within the unit management office accessible to the designated unit management staff only. Hard copies of PREA file cases are stored in secured file cabinets within the investigator's office accessible only to the assigned investigators.

115.51 (c) TDOC Index 502.06.2 and TDOC 502.06 outlines the mandate of the standard provision. Staff accept reports made verbally, in writing, anonymously, and from third parties. All staff are required to report immediately to their supervisor any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment that occur in a facility, whether or it is part of TDOC, retaliation against

inmate or staff who have reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Facility staff report all allegations of sexual abuse and sexual harassment, including third-party, and anonymous reports to the facilities designated investigator(s).

All allegations shall be documented within 24 hours of becoming known to facility staff in the PREA Allegation System (PAS). The Facility PREA Coordinator (FPC) or institution investigator(s) call the TDOC Central Communication Center within 24 hours to report the allegation. The caller will not provide any details regarding the allegation, but rather provide only the PAS number assigned to the allegation. The FPC/designee reviews all PAS entries to ensure the allegation was documented within 24 hours of becoming known to facility staff. This review document on the Sexual Abuse Incident Check Sheet, CR-3776. Approval of selected staff to have security access for the PAS is requested by the FPC to the TDOC Statewide PREA Coordinator.

All staff are issued and carry a PREA Action Steps for Allegations Card that includes Staff Duty to Report; You have a duty to report any knowledge, suspicion, or informant of an incident to sexual abuse or sexual harassment; Neglect or violation of responsibilities by staff that may have contributed to incident or retaliation; Retaliation against an inmate or staff who reported an incident. .

Interviews conducted with random staff acknowledged their commitment to accept all reports of sexual abuse and/or sexual harassment regardless of the method received to include verbally, in writing, anonymously and/or via a third party. Staff also acknowledged they would document the information received as soon as possible and prior to departing from their assigned shift.

Interviews with random and targeted group inmates acknowledged their awareness of various way to report sexual abuse and sexual harassment that include reporting to staff, through family members or friends, in writing or through the free calls to *9222, or *9555 that is posted in large font on the bulletin boards in all housing units and throughout each site. They also acknowledged that the message on how to report sexual abuse or sexual harassment is an automatic message received upon assessing the inmate phones to include tablets.

The review of the ten (10) investigative casefiles confirmed six (6) were reported verbally to staff, one (1) was reported via the submission of a grievance and three (3) were reported via the institutional PREA Hotline *9222.

115.51(d) TDOC Index 502.06.2 indicates that staff may privately report sexual abuse and sexual harassment of inmates to the Central Office PREA Tip Line (615-253-8178). The PREA Lesson Plan includes a training session regarding the reporting of PREA allegations that include staff may privately report to the Central Office PREA Tip Line (615-253-8178).

Interviews with random staff indicated they were knowledgeable in how to privately report sexual abuse or sexual harassment. Most staff cited reporting to the WTRC Institution Investigators and/or the Associate Warden (T)/WTRC PREA Coordinator, as their primary methods of reporting.

	Based on the review of agency policies, successful testing of internal and external reporting options available to the inmate population, interviews with staff and the inmate population, and site observation, the facility has demonstrated compliance with all the provisions of the standard.
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 501.01 Inmate Grievance Procedures (Effective 11/2/2022) 3. TDOC Inmate Grievance Procedure Handbook 5. PREA Investigative Case Files 6. WTRC Inmate Rules & Regulations Handbook 7. TDOC PREA Guide to Prevention and Reporting of Sexual Misconduct for TDOC Females Offender Brochure 8. TDOC Agency Website 9. Site Observation 10. Interviews with: <ol style="list-style-type: none"> a. Statewide Hotline Operator b. Grievance Sergeant c. Inmates Who Reported Sexual Abuse d. TDOC Statewide PREA Coordinator <p>115.52 (a) TDOC Index 501.01 outlines the mandate of the standard provisions and states an inmate may submit a grievance alleging sexual abuse at any time.</p> <p>115.52 (b) TDOC Index 501.01 states applicable time limits shall apply to any portion of a grievance that does not allege an incident to sexual abuse. Inmates shall not be required to use any informal grievance process, or to otherwise attempt to resolve with staff an alleged incident of sexual abuse.</p> <p>The TDOC Inmate Grievance Procedure Handbook pages 10 -11, includes Grievances Regarding PREA. Procedures include the applicable time limits of filing, notification to</p>

the inmate and the availability of third-party reporting. The handbook also includes the procedures of filing emergency grievances in relation to PREA.

115.52 (c) TDOC Index 501.01 and states an inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint.

Per interviews with the WTRC Investigator, and WTRC Grievance Sergeant, all grievances alleging sexual abuse and /or sexual harassment are immediately forwarded to the WTRC Associate Warden of Treatment/Facility PREA Coordinator who then forwards it to the WTRC Investigators for the completion of an investigation. All correspondence with the inmate regarding the PREA allegation is by the WTRC Institution Investigators.

115.52 (d) TDOC Index 501.01 states a final decision on the merits of any portion of the grievance alleging sexual abuse shall be issued by the Associate Warden of Treatment (AWT) or Deputy Superintendent (DS) within 90 days of the initial filing of the grievance. Computation of the 90-time period shall not include time used by inmates in preparing the grievance. TDOC may claim an extension of the time to response, up to 70 days, if normal time period for response is insufficient to make an appropriate decision. The inmate shall be notified in writing by the AWT/DS of any such extension and be provided at by which a decision will be made. At any level of the grievance, including final level, if the inmate does not receive a response within the time allotted to reply, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level.

The facility reported one (1) sexual harassment, and zero sexual abuse allegations reported through the grievance process during the 12-month review period. Documentation supports the sexual harassment allegation was referred to the WTRC Institution Investigators that was concluded on the eighth day of dated submission.

Therefore, the requirement of notification to an inmate in writing when the agency files for an extension, including notice of the date by which a decision was made was not applicable.

Interviews conducted with four (4) inmates who reported sexual abuse indicated each were aware of the grievance process as a method to report sexual abuse. However, no one elected to report via grievance and wasn't certain of the staff's response time. However, all were aware that the allegation would be investigated immediately.

115.52(e) TDOC Index 501.01 states Third parties (including fellow inmates, staff, members, family members, attorneys, and outside advocates) shall be permitted to assist in inmates filling grievances related to allegations of sexual abuse and shall also be permitted to file such grievances on behalf of the inmate.

If a third party files such a grievance on behalf of an inmate, that inmate shall agree to have the grievance filed on their behalf and document such on the Inmate Grievance, CR-1394. The inmate shall be required to personally pursue any subsequent steps in the grievance process. If the inmate declines to have the

grievance processed on his/her behalf, the inmates' decision shall be documented on the original Inmate Grievance, CR-1394, and signed by the inmate.

The facility reported the number of grievances alleging sexual abuse filed by inmates in the past 12 months in which the inmate declined third-party assistance, containing documentation of the inmate's decision to decline as zero. The review of the one (1) submitted sexual harassment grievance did not include third-party assistance.

The WTRC Inmate Rules & Regulations Handbook lists various third-party reporting resources available to the inmates and staff. Resources include written communication to the Shelby County Crime Victims & Rape Crisis Center by calling *9555 from the inmate phone system. This information is provided in the English and Spanish language.

The auditing team utilized the inmate housing unit phones and tablets to test the inmate's access to third party reporting at *9555. The call was identified as received by a Statewide Hotline Operator for reporting sexual abuse and request of victim advocate services via the Shelby County Crime Victims & Rape Crisis Center. The call was identified as free and confidential.

The auditing team observed grievance forms were located on open shelves in each housing unit accessible to the inmate population. Grievance depositories were observed located in each housing unit.

A memorandum drafted by the Associate Warden (T)/WTRC PREA Coordinator notes Mail is a valid outlet of PREA Communications with an outside agency. All mail identified to the Shelby County Crime Victims & Rape Crisis Center is treated as legal mail. This notice was observed posted on the bulletin boards in housing unit and throughout the facility in program and operational departments.

TDOC PREA Guide to Prevention and Reporting of Sexual Misconduct for TDOC Females Offender Brochure includes the following a method of reporting availability for family members and friend of inmates and the general public who have knowledge of sexual abuse allegations. The method includes the following" TDOC Statewide PREA Coordinator, Central Office 6th Floor, Rachel Jackson Building 320 Sixth Avenue Nashville TN 37243-0465 (615) 253-8178. Additional PREA information is available on the TDOC website: www.TN.gov/correction.

The auditing team conducted a telephone test for confirmation of third-party reporting noted on the agency's' website as the TIP line for third-party reporting of sexual abuse and sexual assault at (615) 253-8178. The auditor completed a call and was directed to leave a message with the reporting information and to include contact information for a return call. The Lead Auditor received notification of the received call from the TDOC Statewide PREA Coordinator within one (1) hour of the call. Per the TDOC Statewide PREA Coordinator, upon receiving third party reporting calls, the information is immediately shared with the affected facility and an investigation is initiated at the facility level.

115.52 (f) TDOC Index 501.01 states after receiving an emergency grievance alleging

	<p>that an inmate is subject to a substantial risk of imminent sexual abuse, the grievance chairperson shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to the AWT/DS so that any required immediate corrective action may be taken. The grievance chairperson shall provide an initial response within 48 hours and shall issue a final decision within five calendar days. The initial response and final decision provided within the PREA Allegation System (PAS) shall document the facility's determination as to whether the inmate is at substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance. The noted time frame in provision (d) still applies after any immediate corrective action has been implemented. The facility reported that zero emergency grievances of sexual abuse were filed during the review period.</p> <p>115.52 (f) TDOC Index 501.01 states that after receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the grievance chairperson shall immediately forward the grievance to the Associate Warden of Treatment for any corrective action to be taken. The grievance chairperson will provide a response within 48 hours and a final decision within five calendar days. There were zero sexual abuse and/or sexual harassment allegations filed through the emergency grievance process where an inmate alleged being at a substantial risk of imminent sexual abuse during the 12- month review period. However, the initial response and final decision would be maintained within the PREA Allegation System (PAS) and shall document the facility's determination as to whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.</p> <p>115.52 (g) TDOC Index 501.01 states an inmate may be disciplined for filing a grievance related to alleged sexual abuse only when it is demonstrated that the inmate filed the grievance in bad faith. The facility reported zero allegations of sexual abuse or sexual harassment were reported through the grievance process were reported as being in bad faith. Therefore, there were zero instances of discipline applied relevant to the standard provision.</p> <p>Based on the review of the agency and facility's grievance policies, inmate handbook, allegation reported via grievances, site observation and testing of third-party reporting, staff and inmate interviews, WTRC does meet all provisions of the standard</p>
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115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ)

2. TDOC Index 502.06.3 Medical, Behavioral Health, Victim Advocacy, and Community Support Services for PREA Victims (Effective 08/01/2020)
 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024)
 4. MOU with The Shelby County Crime Victims & Rape Center
 5. WTRC Rules and Regulations Handbook
 6. The Shelby County Crime Victims & Rape Crisis Center Postings
 7. Testing of Access to Services
 8. Interviews with:
 - a. Formal and Informal Random Inmates
 - b. The Shelby County Crime Victims & Rape Crisis Center Representative
 - c. Inmates Who Reported Sexual Abuse
- 115.53 (a) (b) (c) TDOC Index 502.06.3, TDOC Index 502.06, and WTRC Index 502.06.2-1, and outlines the mandates of the standard provisions. Inmates Access to Facility and Outside Confidential Support Services: (1) The name and contact information of the facility's Inmate PREA Victim Advocate shall be posted on each housing unit bulletin board. The facility shall ensure that inmates are provided access to outside victim advocate for emotional support services related to sexual abuse by giving inmates the mailing address and telephone numbers, including toll-free hotline numbers, were available, of local, state, or national victim advocacy or rape crisis organization and, for persons detained solely for civil immigration purposes, immigrant services agencies.
- (2) The Facility PREA Coordinator shall ensure that inmates are informed, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.
- (3) The TDOC shall attain a memorandum of understanding (MOU) or other agreements with community services providers that are able to provide inmates with confidential emotional support services related to sexual abuse. Memorandum of Understand are to be approved by the TDOC General Counsel prior to implementation.
- Upon each inmate's arrival at WTRC they are issued a WTRC Inmate Rules and Regulations Handbook that is available in English and Spanish. The WTRC handbook notes "If assistance is needed, contact any staff member, A hotline for reporting sexual assault is available by calling *9222. "To report incidents of sexual abuse to an outside resource, you may call the following number, The Shelby County Crime Victims & Rape Crisis Center (CVRCC) by dialing *9555. This call is confidential and will not be recorded by TDOC. The Shelby County Crime Victims & Rape Crisis Center also provide victim advocacy services.

TDOC established a Memorandum of Understanding for the West Tennessee State Penitentiary that includes WTRC and The Shelby County Crime Victims & Rape Crisis Center. The Memorandum of Understanding was dated September 9, 2015, and include the commitment to provide confidential victim advocate services to victims suffering from sexual assault. These services were confirmed during interviews with representatives The Shelby County Crime Victims & Rape Crisis Center.

The handbook also provides the mailing address to the CVRCC at 1060 Madison, Memphis, TN 38104. Inmates may contact the Shelby County Crime Victims & Rape Crisis Center by calling*9555 from the inmate phone system.

The auditing team observed the CVRCC postings on bulletin boards throughout the facility to include in all housing units, library, food service department, education, religious services, medical, mental health, recreation, operational departments, maintenance, administration, visitation, intake, lobby, and staff offices that noted the available victim advocate services provided by the CVRCC. These phone calls were identified as free and confidential. The mailing address is listed as The CVRCC at 1060 Madison Ave, Memphis, TN.

The auditing team observed telephones available for usage by the inmate population in all housing units throughout the facility to include those inmates in the segregation units who are also afforded the opportunity to utilize the phones. Per supervisory staff assigned to segregation, an inmate request to report a PREA allegation and/or contact The CVRCC to include via phone would be given access.

The auditing team conducted a test call to *9555, The CVRCC by using the inmate housing unit telephone and inmate issued tablets during the site observation. At the initiation of making the call, a message quoted the call was free, confidential and would not be recorded. The call was immediately accepted, and the auditor was advised that both reporting and victim advocacy services were available upon request. The auditor's call was answered by a Statewide Hotline Operator who confirmed the services are available 24/7/365 and upon a caller identifying their request for the services of a victim advocate, the call would be appropriately transferred. An interview with supervisory staff of the CVRCC confirmed the services availability.

Formal and informal interviews with the inmate population acknowledged their awareness and observation of available advocate services information posted throughout the facility on bulletin boards for the CVRCC at 1060 Madison Ave, Memphis, TN and how to access via phone and/or by their tablet at *9555, or in writing. All inmates were aware that the calls were free, confidential and would not be recorded. However, zero inmates indicated they had elected to utilize victim advocacy services through these resources and could not provide information regarding the available services.

The inmate population also confirmed they have the availability to purchase writing instruments to include note pads, ink pens, pencils and postal stamps from the inmate commissary that allows them to communicate in writing both internally and externally with others. Additionally, writing instruments are provided by the facility as

	<p>needed. However, since the issuing of their individual tablets, the tablets are the most common method utilized to communicate for verbal and written communications.</p> <p>General mailboxes were accessible to the inmate population in all housing units. Mail is collected Monday through Friday and provides an avenue for the inmate population to report internally and externally to include anonymously. The facility provides inmates with paper noted as a "Two -way Message"/ Inmate Request form to communicate in writing to staff. Inmates may personally give the note to staff, place it under the staff's office door, and/or place it in one of the available mailboxes.</p> <p>An interview with staff assigned to the facility mailroom confirmed the inmates' outgoing mail is sealed by the inmate. Written correspondence between inmate and Shelby County Crime Victims & Rape Crisis Center is not monitored by the mailroom staff and would be treated as legal mail. This procedure was also documented in a memorandum drafted to "All Staff" from the WTRC Associate Warden of Treatment/ WTRC PREA Coordinator submitted through the WTRC Warden.</p> <p>115.53 (c) TDOC established a Memorandum of Understanding (MOU) with The Shelby County Crime Victims & Rape Crisis Center (CVRCC) for the TDOC Mark Luttrell Correctional Complex and the West Tennessee State Penitentiary that includes the Women Therapeutic Residential Center. The final approval signature was noted as September 9, 2015. The MOU identifies the availability of the following services: 1) Make involvement of trained sexual assault advocates a component of the standard response to a report sexual assault and/or a request for help from a survivor of sexual assault. 2) Provide for logistical needs, such as a private meeting space for counseling sessions and security clearance for designated CVRCC staff. 3) Respect the nature of privileged communication between the sexual assault advocate and client; 4) Facilitate follow-up and ongoing contact between the client and sexual assault advocates, without regard to the presence of or status of an investigation. 5) Provide training for the CVRCC staff. 6) Communicate any question to the CVRCC.</p> <p>CVRCC supervisory staff acknowledged awareness of the MOU established between the TDOC that includes WTRC and the availability of victim advocacy services 24/7/ 365 during the completion of forensic medical examination, and follow-up advocacy support services. Although the CVRCC has not received any request for services from the inmate population, the agency has expanded their services since the establishment of the MOU and offers additional services that are not included.</p> <p>Based on the review of agency policies, facility's Inmate Rules and Regulation Handbook, confirmation of MOU with CVRCC and confirmation of availability of victim advocate services to the inmate population, site observation, and interviews, facility does meet all standard provisions.</p>
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115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. WTRC Completed Pre-Audit Questionnaire (PAQ)
2. TDOC Index 506.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08-01-2020)
3. TDOC Index 502.6 Prison Rape Elimination Act (PREA) (Effective 10-21-2024)
4. TDOC Index 501.01 Inmate Greivance Procedures
5. WTRC Inmate Rules and Regulation Handbook
6. PREA Posters and PREA Reference Memorandums
7. TDOC PREA Guide to Prevention and Reporting of Sexual Misconduct for TDOC Females Offender Brochure
8. TDOC Agency Website
9. Testing of Third-Party Reporting Procedures
10. Site Observation
11. Interviews:
 - a. Inmate Population
 - b. Random Staff
 - c. TDOC PREA Coordinator
 - d. WTRC Mailroom Staff
 - e. Hotline Operator

115.54 (a) TDOC Index 502.06.2 and TDOC 502.06 states, The Department provides at least one way for inmates to report abuse or harassment to an outside governmental entity that is not affiliated with the Department or that is operational independent from Department leadership. This information shall be included in the inmate handbook. Additionally, the polices note staff may report privately report sexual abuse and sexual harassment of inmates to the Central Office PREA Tip Line (615) -253-8178.

Third party reporting accessibility to the inmate population, staff to include volunteers and contractors was observed posted on bulletin boards in each housing unit, facility entrance, program areas, operational departments, food services, warehouse, TRICOR, education, medical and mental health department. The notices included the available resource for reporting confidential and free reports to outside agencies via third-party by contacting the Shelby County Crime Victims & Rape Crisis Center by

dialing *9555 located at 1060 Madison Ave, Memphis, TN 38104. These calls were noted as confidential and not recorded by TDOC. Written correspondence addressed to the Shelby County Crime Victims & Rape Crisis Center is treated as legal mail. The information was observed posted in both English and Spanish on bright pink sheets of paper easily visible and in large font to assist those individuals with low vision.

Upon each inmate's arrival at WTRC they are issued a WTRC Inmate Rules and Regulations Handbook that is available in English and Spanish. The WTRC handbook notes "To report incidents of sexual abuse to an outside resource, you may call the following number, Shelby County Crime Victims & Rape Crisis Center by dialing *9555. This call is confidential and will not be recorded by TDOC.

The Shelby County Crime Victims & Rape Crisis Center has a Memo of Understanding with the WTRC to provide confidential crisis counseling to victims suffering from sexual assault. Per an interview with the Customer Service Specialist, they confirmed the agency has a 24-hour service available to the callers who report sexual abuse that will only be shared with the others upon authorization for the release of the information by the victim to include those inmates at WTRC.

The TDOC PREA brochure provided to the inmate population includes family and friends of inmates and the general public who have knowledge of sexual abuse allegations within the TDOC system are encouraged to report allegations to the TDOC Statewide PREA Coordinator TDOC Central Office 6th Floor, Rachel Jackson Building 320 Sixth Avenue North Nashville, TN 37243-0465 or (615) 253-8178.

TDOC Index 501.01 states Third parties (including fellow inmates, staff members, family members, attorneys, and outside advocates) shall be permitted to assist inmates in filing grievances related to allegations of sexual abuse and shall also be permitted to file such grievances on behalf of the inmates.,

Staff including agency, contractors and volunteers were observed in possession of PREA Action Steps information cards that included but not limited to various ways for external reporting of sexual abuse and sexual harassment. The avenues noted include the TDOC PREA Coordinator @ 615-253-8178, Sexual Assault Center of Middle Tennessee @ 800-879-1999 and the National Sexual Assault Hotline @ 800-656-HOPE (4673).

Third party reporting is noted on the agency website at <https://www.tn.gov/correction/state-prison/prison-rape-elimination-act.html> and is accessible to the public. Response to Sexual Assault or Sexual Misconduct Allegation includes that in addition to the facility PREA Tip Line, TDOC has established a TIP Line for third-party reporting of sexual abuse and sexual assault at (615) 253-8178. The Lead Auditor conducted a test phone call at the TDOC third party reporting Tip Line. The auditor was asked to leave a voice message with detailed information regarding the circumstances of the call. The auditor received a call from the TDOC PREA Coordinator acknowledging receipt of call within an hour of the completed call.

The PREA Audit Notice was observed posted on bulletin boards in all inmate housing units, to include the food service department, libraries, intake, warehouse,

	<p>maintenance, program areas, education, medical and mental health, and visitation. Confirmation of the PREA Notice was provided to the auditing team by date stamped photographs on March 10, 2025, seven (7) weeks prior to the site observation.</p> <p>Formal and informal interviews with staff and the inmate population to those with low vision, hearing disability, cognitive disability, physical disability and LEP, confirmed their awareness, knowledge, and understanding of the information provided that allow them to report sexual abuse and/or sexual harassment by a third-party.</p> <p>The auditing team did not receive any written correspondence from the WTRC inmate population nor staff requesting to participate in the interview process during the site observation.</p> <p>Per an interview with WTRC mailroom staff, the inmates' outgoing mail is not screened by staff. Therefore, inmates may submit written correspondence for third party reporting to family, friends, the Shelby County Crime Victims & Rape Crisis Center, the auditing team and others as an option. Mailboxes were observed in all housing units for the placement of outgoing mail. Mailboxes identified for the deposit of grievances were also observed in the housing units accessible to the inmates.</p> <p>The auditing team conducted a test call for third party reporting accessible to the inmate population through use of the inmate housing unit phones and issued tablets during the site observation. The call was successfully completed upon dialing *9555. The call was received by a Statewide Hotline Operator who confirmed 24-hour Crisis Line availability for reporting and relaying information to the facility upon approval by the caller.</p> <p>The review of the investigative case files confirmed zero inmates elected to report sexual abuse via dialing *9555 to the Shelby County Crime Victims & Rape Crisis Center or other external reporting. Those who reported sexual abuse and/or sexual harassment elected to report internally. However, one (1) sexual abuse allegation was reported by a third party (inmate) through use of the WTRC institutional PREA Hotline *9222. The investigation was concluded as substantiated.</p> <p>The auditing team observed the inmate population in possession of issued tablets and telephones for third party reporting to family and friends and the Shelby County Crime Victims & Rape Crisis Center via dialing 9555. Mailboxes were also observed in the housing unit for the deposit of outgoing mail in addition to grievance mailboxes.</p> <p>Based on the review of agency policies, site observation, interviews, testing of available third-party reporting procedures, the facility does meet compliance</p>
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115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. WTRC Completed Pre-Audit Questionnaire (PAQ)
2. TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08-01-2020)
3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 21-21-2024)
4. PREA Refresher Cards
5. PREA Investigative Casefiles
6. Site Observation
7. Interviews with:
 - a. WTRC Warden
 - b. Behavioral Health Administrator
 - c. Health Services Administrator
 - d. TDOC Statewide PREA Coordinator
 - e. Randon Staff

115.61 (a) TDOC Index 502.06.2 and TDOC Index 502.06 states, "All staff are required to report immediately to their supervisor any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of TDOC, retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Staff to include agency, contractors and volunteers were observed in possession of a PREA Refresher card that includes staff duty to report any knowledge, suspicion, or information of an incident of sexual abuse or sexual harassment, neglect of violation of responsibilities by staff that may have contributed to an incident or retaliation, retaliation against an inmate or staff member who report an incident.

Interviews with randomly selected security, and non-security staff indicated they were aware of their responsibility and duty to immediately report all PREA allegations. Staff stated they would immediately report to the Shift Commander, the Institution Investigators, and /or the Associate Warden (T)/PREA Coordinator by phone or during an in-person conversation and would submit a written report of the information shared.

115.61(b) TDOC Index 502.06.2 and TDOC Index 502.06 outline staff must not reveal any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

Interviews with random security, non-security, and specialized staff confirmed their awareness of the extent in which information of sexual abuse and/or sexual harassment would only be shared with authorized staff necessary to make treatment, investigation and other security and management decisions. Staff stated they would only share the information with their direct supervisor, shift commander and investigative staff.

115.61(c) TDOC Index 502.06.2 and TDOC 502.06 notes the mandate of the provision. Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse as outlined in this policy and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services. Additionally, interviews with both medical and mental health staff verified, all inmates are required to sign a consent form during the initiation of services upon their arrival and the inmates are reminded during each additional treatment service. However, inmates assigned on the mental health caseload sign a consent form annually. Inmates who are not on the mental health caseload and are not seen regularly are not required to update their consent form annually. Both were aware of their duty to report all information of reported sexual abuse and sexual harassment and was aware that Tennessee is identified as a mandatory reporting state.

115.61(d) Per the TDOC Statewide PREA Coordinator, and WTRC Warden, the facility does not house youthful offenders under the age of 18, but at times may house vulnerable adults. However, TDOC has received guidance from the Tennessee Department of Human Services (DHS) Adult Protective Services, and the Department of Children's Services (DCS) that TDOC are responsible for completing investigations of to include those under the age of 18 years old and vulnerable adults. The facility provided an Inter-office Correspondence from the Office of General Counsel Department of Human Services, and the State of Tennessee Workflow to Protect Vulnerable Adults that states Adult Protective Service isn't required to investigate allegations of abuse, neglect or exploitation of persons in jails/correctional facilities.

WTRC does not house individuals under the age of 18 years. Additionally, there were zero reported allegations of sexual abuse involving inmates identified as vulnerable. Therefore, documentation of reports as such were not applicable for review.

115.61(e) TDOC 502.06.2 and TDOC 502.06 states, Facility staff shall report all allegations of sexual abuse and sexual harassment, including third-party, and anonymous reports, to the OIC Institution Investigator for an investigation. Per the WTRC Warden, all allegations of sexual abuse and/or sexual harassment are immediately reported to the Associate Warden (T)/PREA Coordinator and the WTRC Investigators. He is immediately notified of all reported allegations and is kept abreast throughout the investigative proceedings, and findings. Those allegations that include possible criminal charges are referred to the OIC Special Agent for completion of the investigation.

The facility reported seven (7) sexual abuse and three (3) sexual harassment allegations. Documentation of the ten (10) completed investigations were submitted

	<p>for review.</p> <p>Based on the review of agency policies, PREA Refresher Cards, investigative casefiles, interviews and analysis, the facility has demonstrated compliance with all the provisions of this standard.</p>
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115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08-01-2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (10-21-2024) 4. Interviews with: <ol style="list-style-type: none"> a. Agency Head Designee b. Warden c. Random staff <p>115.62 (a) TDOC Index 502.06.2 and TDOC 502.06 outlines the mandate of the standard that states “If facility staff receives information that an inmate is subject to a substantial risk of imminent sexual abuse, staff shall take immediate action to protect the inmate.”</p> <p>An interview with the Agency Head Designee indicated TDOC has an immediate response system in place as sexual safety is taken seriously by the agency. The first step would be to separate the at-risk individual from the potential risk and protect them from harm. There are specific areas of the compound that are designated as protective custody (PC). A protective custody investigation will be initiated, and any issues identified. The offender will remain housed in PC until the risk is eliminated by a transfer of the potential threat or until the offender expresses that they are no longer fearful and want to return to the compound.</p> <p>The Warden indicated in circumstances where the facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, methods to ensure safety, the victim would be relocated to another housing unit where they may feel more comfortable. Inmates are not allowed to enter any housing unit that they are not assigned. An inmate identified as a threat would be placed in involuntary segregation pending disciplinary sanctions.</p>

	<p>The auditing team utilized a variety of scenarios during interviews with 15 random security and non-security staff. All staff indicated they would remove the inmate from the area of threat, secure and/or maintain a visual of the inmate while notifying the Shift Commander.</p> <p>The PAQ indicated in the past 12 months, the number of times the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse as zero.</p> <p>Based on the review of agency policies, interviews and analysis, the facility has demonstrated compliance with this standard.</p>
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115.63 Reporting to other confinement facilities	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08-01-2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 4. Interviews with: <ol style="list-style-type: none"> a. Agency Head Designee b. Warden <p>115.63 (a) (b) (c) (d) TDOC Index 502.06.2 and TDOC 502.06 outlines the mandate of the standard provisions.</p> <p>111.63 (a) TDOC Index 502.06.2 and TDOC 502.06 notes Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Warden/ Superintendent of the facility that received the allegation notifies the Warden/ Superintendent of the facility where the alleged abuse occurred in writing using an official letterhead and files a copy in the investigation file. The PAQ indicated the number of allegations the facility received that an inmate was abused while confined at another facility was zero.</p> <p>115.63 (b) (c) In accordance with TDOC Index 502.06.2 and TDOC 502.06, Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation. The facility shall document that it has provided such notification. The facility reported zero sexual abuse or sexual harassments allegations were reported to have occurred at another facility by an inmate upon their arrival at</p>

	<p>WTRC in an excess of the 12 -month review period. Documentation of notification in accordance with the standard provision was not applicable.</p> <p>115.63 (d) Per TDOC Index 502.06.2 and TDOC 502.06, The Warden/Superintendent who receive such notification shall ensure the allegation is investigated in accordance with TDOC policy.</p> <p>Per an interview with the TDOC Agency Head Designee, in such instances of a facility reporting and/or receiving an unreported allegation, the designated point of contact is the TDOC Statewide PREA Coordinator, who in turn will notify the Warden, the Facility's PREA Coordinator, and the Facility's Institutional Investigator. The agency does have examples of outside agency referrals as the referrals are routinely received from the various Rape Crisis Centers where the agency has established a MOU.</p> <p>Per an interview with the WTRC Warden, upon an inmate reporting sexual abuse or sexual harassment regardless of where or when it was reported to have occurred, an investigation would be conducted.</p> <p>Based on the review of agency policies, documentation of notification and review of investigative case file, in addition to staff interviews, the facility does meet compliance of the standard.</p>
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115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, and Sexual Abuse Response Team (SART) (Effective 08/01/2020) 3.TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 4. WTRC PREA Response Card 5. PREA Investigation Casefiles 6. Interviews with: <ol style="list-style-type: none"> a. Inmates Who Report Sexual Abuse b. Random Staff Interviews c. Non-security First Responder

d. Security First Responder

115.64 (a) (b) TDOC 502.06.2 and TDOC 502.06 outline the mandate of the standard provisions. If the first staff responder is not a security staff member, he/she is required to instruct the alleged victim not to take any action that could destroy physical evidence and then immediately notify the shift command. The alleged victim and abuser shall be instructed not to wash their hands, shower, brush teeth, change clothes, urinate, defecate, drink, or eat. The shift commander who is notified of the allegation initiates the Sexual Abuse Incident Check Sheet, CR-3776. Security separates the alleged victim and abuser. Security preserves and protect any crime scene until appropriate steps can be taken to collect any evidence. Security staff notifies SART.

Staff are issued individual laminated cards to carry on their person. The card includes PREA Action Steps to follow when an inmate reports sexual abuse. The steps are as follows: 1) Ensure the alleged victim is safe and has no contact with the alleged aggressor. 2) Notify the Shift Commander immediately who notifies the Associate Warden(s); 3) Ensure the inmate does not remove clothing, shower, use restroom, brush teeth, eat or drink until examined by medical. Immediately 1) Escort alleged victim to medical for PREA exam. 2) Secure crime scene of alleged incident if occurred within the past 72 hours. 3) Once the inmate is safe, all pertinent information will be documented on the PREA Allegation Screen.

If the alleged abuse occurred within a 72-hour time period of reporting, the shift commander shall initiate the Sexual Abuse Incident Check Sheet, CR 3776 included in the TDOC Index 502.06.2. Security staff shall separate the alleged victim and abuser. Security shall preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. The Shift Commander shall notify the Sexual Assault Response Team (SART)

The PAQ noted in the past 12 months, the number of allegations that an inmate was sexually abused as seven (7). The PAQ noted of these allegations of sexual abuse in the past 12 months, the number of times the first security staff member to respond to the report separated the alleged victim and abuser as three (3). However, according to the auditing team review's of the seven (7) sexual abuse investigative casefiles, there were zero times where the first security staff member to respond to the report separated the alleged victim and abuser. The review confirmed that the victim and aggressor had self-separated prior to reporting the allegations and did not require immediate separation by staff. The separation applied by staff was housing assignments only. However, an interview with a staff member who served as the first responder indicated the victim and aggressor were separated when they became aware of the allegation as the allegation had previously occurred the prior day and there was no evidence identified for collection.

The PAQ noted number of allegations where staff were notified within a time that allowed for the collection of physical evidence as zero.

Interviews with four (4) inmates who reported sexual abuse stated staff responded immediately upon reporting. One (1) stated the allegation was reported through the

	<p>PREA Tip line *9222. One (1) was reported during a separate investigation; One (1) was reported during a mental health session; One (1) was reported via third party through the institutional PREA Tip Line *9222. Each stated they were previously self-separated from the alleged aggressor when staff responded.</p> <p>Upon reporting and/or receiving the allegation of sexual abuse, each victim stated staff responded immediately and they remained separated from the aggressor, interviewed by WTRC institution investigators and were assessed by medical staff. Each stated there were no physical evidence for collection.</p> <p>115.64 (b) TDOC 502.06.2 and TDOC 502.06 outline the mandate of the standard provision. If the first staff responder is not a security staff member, he/she is required to instruct the alleged victim not to take any action that could destroy physical evidence and then immediately notify the shift commander.</p> <p>The PAQ indicated of the allegations that an inmate was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder as one (1).</p> <p>The PAQ noted of those allegations responded to first by a non-security staff member, the number of times that staff member requested that the alleged victim not take any actions that could destroy physical evidence as zero and of those allegations responded to first by a non-security staff member, the number of times that staff member notified security staff as zero.</p> <p>A mental health practitioner served as a non-security first responder. She stated the inmate reported an allegation of continuous unwanted touching on the arm and through clothing by a staff member. The Shift Commander was immediately notified, and the victim was advised to remain in her office pending their arrival.</p> <p>Interview with random staff indicated all were aware of their responsibilities as a first responder. Staff stated they would immediately separate the victim and aggressor, advise the victim not to wash their hands, shower, brush teeth, change clothes, urinate, defecate, drink or eat. The Shift Commander would immediately be notified. Staff reference the PREA Actions Steps card in their possession during the interview.</p> <p>Based on the review of agency policies, review of sexual abuse investigations, medical documentation, PREA Response Card, PREA investigative casefiles, and interviews with security first responder, non-security first responder staff, random staff and the inmate population, WTRC does meet all provisions of the standard.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. WTRC Index 502.06.2-1 PREA Allegations, Investigations, SART (Effective 03/01/2022) 3. SART Members Appointment Notice Postings 4. Site Observation 5. Interview: <ol style="list-style-type: none"> a. Warden <p>115.65 (a) Per an interview with the WTRC Warden, he identified the facility's policy WTRC Index 502.06.2 -1 that outlines the written institutional plans to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>A memorandum drafted by the WTRC Warden to all staff was observed posted on bulletin boards throughout the facility in housing units, program and operational areas, identifying the members and position of the Sexual Assault Response Team (SART) that was visually to all staff, inmates, contractors and volunteers.</p> <p>WTRC Index 502.06.2-1 identifies the facility's procedures to follow upon notification of a reported PREA allegation. The policy outlines the response procedures of accepting reports of sexual abuse being accepted by staff verbally, in writing, anonymously and from third parties. Procedures outlined include the following: 1) Staff first responders are required to instruct the alleged victim not to take any actions that could destroy physical evidence, including showering, brushing teeth, changing clothes, relieving bodily functions, drinking, or eating, and immediate notification to the shift. 2) If the alleged abuse occurred within a 72-hour time period of reporting, the shift commander shall initiate the Sexual Abuse Incident Check Sheet, CR-3776 that is attached to TDOC Policy #502.06.2. 3) Security shall separate the alleged victim and the alleged abuser(s). 4) The shift commander will notify the SART.</p> <p>The coordinated response for follow-up care services includes the following: the responsibility of the SART to determine if a Sexual Abuse Nurse Examiner response is necessary; or if the alleged victim is to be transported to the Regional Medical Center at Memphis (The Med) for a SANE examination; investigative procedures; victims of sexual abuse access to unimpeded; access to emergency medical treatment crisis intervention services; follow-up care for sexual abuse; inmate access to facility and outside confidential support service.</p> <p>Based on a review of the facility policy, site observation, interview and analysis, the facility has demonstrated compliance with this standard.</p>
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	abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>. WTRC Completed Pre-Audit Questionnaire (PAQ)</p> <p>2. Tennessee Code Annotated 50-1-207</p> <p>3. Interview with:</p> <p>a. Agency Head Designee</p> <p>115.66 (a)TCA Code 50-1-207 states “Prohibition against requiring any employer or employee to waive their rights under the National Labor Relations Act or require acceptance or agreement to any provisions that are mandatory or non-mandatory subject of a collective bargaining under Federal law. The Agency Head Designee reported TDOC does not have any collective bargaining agreements for this facility nor has the agency entered into any collective bargaining agreement since August 20, 2012. There is a historical agreement in one of the agency’s East Tennessee facilities, but it does not grant protection for staff during any allegation of misconduct.</p> <p>Based on a review of the Tennessee Code, interview and analysis, the facility has demonstrated compliance with this standard.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <p>1. WCTRC Completed Pre-Audit Questionnaire (PAQ)</p> <p>2. TDOC Index 502.06.2 PREA Allegations, Investigations, and Sexual Abuse Response Team (SART) (Effective 08-01-2020)</p> <p>3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (10-21-2024)</p> <p>4. WTRC SART Team Appointment Memo</p> <p>5. Retaliation Monitoring Documentation</p> <p>6. Interviews with:</p> <p>a. Agency Head Designee</p>

b. WTRC Warden

c. Staff Charged with Conducting Retaliation Monitoring

d. Inmates Who Reported Sexual Abuse

115.67 (a) TDOC Index 502.06.2 and TDOC Index 502.06 notes the mandate of the standard provision. Inmates and staff who are involved in reporting sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations shall be protected from retaliation by other inmates or staff. Appointed members of the SART monitor staff and inmates for protection from retaliation utilizing PREA Retaliation Review (Inmate), CR-3963, for inmate and PREA Retaliation Review (Staff), CR-3982.

115.67 (b) TDOC Index 502.06.2 and TDOC Index 502.06 outlines the mandate of the standard provision. Monitoring involves looking for any changes that may suggest possible retaliation by inmates or staff. SART members must act promptly to remedy any such retaliation. Monitoring continues beyond 90 days if the initial monitoring indicates continuing need. Areas to be monitored include but are not limited to the following: a) Inmate disciplinary reports; b) Inmate housing or programming changes; c) Negative performance reviews or reassignment of staff.

Per an interview with the Agency Head Designee, TDOC monitors victim and aggressors for retaliation relations on a 30-day, 60-day, and 90-day time frames, in addition, TDOC offers the victim the ability to transfer facilities. Should the victim decide to remain, the aggressor is transferred to another facility. At a minimum, the victim and aggressor are listed as incompatible and prohibited from being housed together. Departmental monitoring shall involve looking for any changes that may suggest possible retaliation by inmates or staff. Institutional SART members shall act promptly to remedy any such retaliation.

Per an interview with the Warden, retaliation toward staff and/or inmates is prohibited and an investigation would be initiated for all individuals suspected of performing acts of retaliation. Measures taken to protect inmates include staff assigned to conduct retaliation monitoring conducting individual meetings with the victim and/or individual who cooperated with the investigation at a minimum of 30 days, 60 days and 90 days intervals. The WTRC PREA Compliance Monitor and the Associate Warden (T)/WTRC PREA Coordinator are members of the facility's SART and are assigned to conduct retaliation monitoring for both staff and the inmate population. Inmates would be monitored for unjustifiable work assignment change, increased in disciplinary sanctions, sudden increase in grievance filed, while ensuring the inmate is not being harassed by other inmates and/or staff.

As stated by the WTRC Warden and confirmed by the WTRC PREA Compliance Manager and the WTRC Associate Warden (T)/WTRC PREA Coordinator, they are assigned to conduct retaliation monitoring on both staff and the inmate population. The WTRC PREA Compliance Manager stated inmates who report sexual abuse and/or sexual harassment, and those who have assisted with an investigation are monitored when the investigations are determined as substantiated and/or unsubstantiated. The

victim and aggressor are normally separated at the initiation of the reported allegation through placement in different housing units to include the aggressor's placement in segregation as applicable. Those monitored for retaliation would be monitored at 30 days, 60-day and 90-days, and longer if needed. Areas reviewed during the retaliation monitoring period include the review for unjustifiable changes in the victim housing, work assignment, programming, and discipline, in addition to unjustifiable changes in their classification level, and reports of harassment by staff and/or other inmates.

Staff members would be monitored for a minimum of 30 days, 60 days, and 90 days. Monitored areas would include identifying any changes in the staff members' assignments, scheduled days and hours of work, negative work performances, unjustifiable write-up or discipline, unreasonable denial of requested leave, denial of reasonable training and promotional opportunities, and unreasonable evaluation ratings and/or significant changes in addition to how they may be affected negatively. If necessary, staff may be referred to the Employee Assistance Program. The monitoring period would exceed 90 days if there were any concerns of possible retaliation towards the staff member.

Upon identifying acts of retaliation by staff and/or inmates, the prohibited acts would be reported to the WTRC Warden, and an investigation would be completed by the WTRC Institution Investigators. There have been zero circumstances in which retaliation was identified regarding the inmate population and/or staff.

Interviews with four (4) inmates who reported sexual abuse indicated they were contacted by the WTRC Associate Warden (T) and the WTRC PREA Compliance Manager who communicated with them each month for a minimum of three (3) months following the report of sexual abuse. Each stated they felt safe from retaliation and had no reason to feel they experienced retaliation from staff or the inmate population after reporting the allegation.

115.67 (c) (d) TDOC Index 502.06.2 and TDOC Index 502.06 outlines the mandate of the standard provision. For at least 90 days following a report of sexual abuse, SART monitors the conduct and treatment of inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse. Retaliation monitoring occurs at 30 days, 60 days, and 90 days intervals. The monitoring begins 30 days after the allegation is made. Monitoring involves looking for any changes that may suggest possible retaliation by inmates or staff. SART members must act promptly to remedy any such retaliation. Staff must act promptly to remedy any such retaliation and monitoring continues an excess of 90 days if the initial monitoring indicates a continuing need.

The PREA Retaliation Review (Inmate), CR-3963 included staff's monitoring of the following: 1) Are the victim and the aggressor listed as incompatible? 2) Are the victim and the aggressor housed in separate housing areas? 3) Is the victim still receiving assistance from a victim advocate? 4) Is the victim still receiving assistance from medical? 5) Is the victim/aggressor still receiving assistance from mental health? 6) Is the victim/aggressor still receiving assistance from program staff? 7) Has the

victim's custody level changed since the PREA violation? 8) Has the victim/aggressor received any disciplinary reports since the PREA violation? Additionally, victim assessments and interview are required during the monitoring meetings that includes (9) Has the inmate being monitored been negatively affected in any manner" If yes, How? 10) Has the inmate being monitored been subject to unprofessional comments and/or negative actions by other inmates, staff, supervisors, and/or administrative personnel as a result of the PREA Violations and if yes, How? SART members' response to comments and actions upon completion of the meetings are discussed and reviewed by numerous SART Members during the scheduled monthly SART meeting.

The facility provided documentation of completed 90-day retaliation monitoring the victims for the five (5) victims of sexual abuse investigations that was concluded as substantiated and/or unsubstantiated. The retaliation monitoring period was noted as performed at 30-day intervals. Neither victim was documented as requiring monitoring in an excess of 90 days. The monitoring staff documented personal interaction with the victims and statements made by the victims.

The PREA Retaliation Review (Staff), CR-3982, requires SART staff conducting the retaliation monitoring for staff identity and note responses for the following: 1) Has the person's days off changed in an unreasonable negative manner? 2)Has the person's shift changed in an unreasonable negative manner?; 3) Has the person's post assignment in an unreasonable negative manner?; 4) Has the person been informed of the employee assistance program?; Has the person received an unreasonable evaluation?; 5) Has the person been declined for special assignments/promotion/academy?; 6) Has the person received any type of disciplinary action deemed to be unreasonable?; 7) Has the person's vacation time been cancelled or changed by his/her supervisor?; 8) Has the person had any other unexplained actions taken against him/her? Additionally, a victim assessment and interview with the staff member are required, that includes: 1) Has the person being monitored been negatively affected in any manner? If Yes, How? 2) Has the person being monitored been subjected to unprofessional comments and/or negative action by other inmates, staff, supervisors, and/or administrative personnel as a result of the PREA violation? If yes, How? 3) SART members response to comments and actions upon completion of the individual meetings are discussed and reviewed by numerous SART Members during the scheduled monthly SART meeting.

There were zero instances where staff were identified to be monitored for retaliation beyond the 12-month review period.

The PAQ noted the number of times an incident of retaliation occurred in the past 12 months as zero.

115.67 (e) TDOC Index 502.06.2 and TDOC Index 502.06 outlines the mandate of the standard provision. The facility employs multiple protection measures, such as housing changes or transfers for inmate victim or abusers, removal of alleged staff or inmate abusers from contact with victims, or emotional support services for inmate or staff who fear retaliation for reporting sexual abuse or sexual harassment or for

	<p>cooperating with investigations.</p> <p>Per the Agency Head Designee, retaliation for cooperation is not tolerated in TDOC, If the individual is an offender they would be granted protective custody status until the aggressor was removed from the compound, and the retaliation could be addressed. If the individual is a staff member, steps are instituted to ensure that retaliation is recognized and addressed appropriately such as termination of an aggressor, staff transfer of retaliator, or re-assignment of retaliator.</p> <p>Per an interview with the WTRC Warden, the following measures would be monitored to ensure an inmate who report sexual abuse and or assist in an investigation is not retaliated against by the monitoring the individual for unwarranted discipline, changes in housing assignment, unjustifiable job changes, negative interaction with staff and/or other inmates, removal and/or denial of programs activities. An investigation would be initiated into any staff and/or inmate suspected of performing acts of retaliation towards others and the appropriate discipline would be imposed. In regard to staff, measures taken to protect staff from retaliation include monitoring for unjustifiable post assignment changes, unwarranted discipline and write-ups, unwarranted denial in the request for leave, sudden change in evaluation assessments and denial for promotions. He concluded by stating that an investigation would also be initiated for any staff and/or inmate performing acts of retaliation toward others followed by applicable disciplinary actions for both inmates and staff.</p> <p>115.67 (f) TDOC Index 502.06.2 and TDOC Index 502.06 outlines the mandate of the standard provision that states the Department's obligation to monitor is terminated if the result of an investigation determines that the allegation is unfounded.</p> <p>Based on the review of the agency's policy, completed retaliation monitoring, and interviews with staff who conduct retaliation monitoring and inmates who reported sexual abuse, the facility does meet compliance with all standard provisions.</p>
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115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, and Sexual Abuse Response Team (SART) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) 4. Segregation Unit Records

5. Record of Staff Visits to Restricted Units

6. Interviews with:

a. Warden

b. Associate Warden/WTRC PREA Coordinator

c. Staff Who Supervise Segregation

115.68 (a) TDOC Index 502.06 and TDOC 502.06.2 outlines the mandate of the standard and indicates any use of restrictive housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements of this policy and coordinated by the unit management team. Protective Services Investigative Routing, CR-3241, shall clearly indicate the basis of concern for the inmate's safety and the reason why no alternative means of separation can be arranged. Inmates at high risk for sexual victimization may be placed in restrictive housing only after an assessment of all available alternatives has been made, and only until an alternate means of separation from likely alleged abuser(s) can be arranged.

Inmates at high risk for sexual victimization may be placed in segregation/restrictive housing only after an assessment of all available alternatives has been made, and then only until an alternative means of separation from likely alleged abuser(s) can be arranged. This housing assignment must not exceed a period of 30 days unless extenuating circumstances prevent the inmate from being housed in an alternative method. SART will document such circumstances during the monthly SART meeting.

Inmates placed in restrictive housing for this purpose shall have access to programs, education, and work opportunities to the extent possible. If an inmate's access to programs, privileges, education, or work opportunities is restricted, the facility documents what opportunities have been limited, the duration of the limitations, and the reasons for such limitations using Contact Notes LCDG in OMS.

If an extension is necessary, the SART member(s) shall clearly document such in the PREA Allegation System application: 1) basis for concern for the inmates' history; 2) the reason why no alternative means of separation can be arranged; 3) the need for emotional support services for inmates or staff who fear retaliation for reporting sexual abuse, or sexual harassment, or for cooperation with investigations. Every 30 days, the facility staff shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.

The PAQ identified the number of inmates who alleged to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero.

Per the PAQ, the number of inmates who alleged to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement was identified as zero. The PAQ also noted a review of case files of inmates who alleged to have suffered sexual

	<p>abuse who were held in involuntary segregated housing in the past 12 months as zero.</p> <p>Additionally, the number of case files that include a statement of the basis for facility's concern for the inmate's safety, and the reason or reasons why alternative means of separation could not be arranged is noted as zero.</p> <p>The PAQ identified the number of inmates who alleged to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement was zero.</p> <p>A memorandum submitted by the Associate Warden/WTRC PREA Coordinator, notes no inmates have been placed in involuntary segregation based on being identified of being at a high risk for sexual victimization. Additionally, per the Associate Warden/WTRC PREA Coordinator, no inmates are assigned to involuntary segregation in an excess of 30 days.</p> <p>Per an interview with the WTRC Warden, the agency and facility policies prohibit placing inmates at high risk of sexual victimization or have alleged sexual abuse in involuntary housing without consideration of alternate available housing that could provide separation from an identified possible threat. Alternative housing is available through various housing assignments within the facility that meets the need of separation as applicable. If an inmate's personal safety is in danger, they would only be placed in protective custody and upon identifying the aggressor, the aggressor would be placed in involuntary segregation pending an investigation and applicable discipline.</p> <p>Per an interview with staff who supervise segregation, indicated inmates who report sexual abuse and/or those inmates who are at a high risk of being sexual abused are never placed in segregation. However, all inmates in segregation are allowed access to educational material, chaplain services, legal and leisure library material, visitation, legal aid to include attorney accessibility, showers, meals, personal grooming, recreation, mail services, and limited telephone access. Confirmation of the services provided was supported through documentation review of Record of Staff Visits to Restricted Units, and Segregation Unit Records.</p> <p>The review of the sexual abuse investigative cases confirmed zero inmates who reported sexual abuse and/or identified at a high risk of being sexual abused were placed in segregation based solely on the standard provision. Therefore, no documentation of segregation housing pursuant to the standard was initiated.</p> <p>Based on the review of agency policy, PAQ, staff interviews ,segregation unit records, and analysis, the facility has demonstrated compliance with this standard.</p>
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115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. WTRC Completed Pre-Audit Questionnaire (PAQ)
2. TDOC Index 502.06.2 PREA Allegations, Investigations, and Sexual Abuse Response Team (SART) (Effective 08/01/2020)
3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024)
4. PREA Investigative Case Files
5. Interviews with:
 - a. OIC Special Agent
 - b. WTRC Institution Investigators
 - c. Inmates Who Reported Sexual Abuse

115.71(a) TDOC 502.06.2 and TDOC 502.06 states it is the policy of TDOC to investigate all PREA sexual abuse and sexual harassment allegations in a timely, efficient, and confidential manner in accordance with federal guidelines (Title 28 (CFR Part 115). Staff shall accept reports made verbally, in writing, anonymously, and from third parties. Allegations shall be documented within 24 hours of becoming known to facility staff in the PREA Allegation System (PAS). These investigations shall be conducted within 72 hours of receiving the allegation. SART team members/ investigators who have received special training in conducting sexual abuse investigations in confinement settings shall investigate all allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

The facility reported seven (7) sexual abuse and three (3) sexual harassment allegations during the 12 -month review period. Two (2) sexual abuse investigations were determined as substantiated. One (1) of the two (2) sexual abuse investigations identified criminal activity. The remaining six (6) sexual abuse and three (3) sexual harassment investigations were concluded as administrative investigations.

Interviews with both the OIC Special Agent and WTRC Investigators indicated normally, the initiation of the investigation is required within 24 hours upon being reported and must be uploaded in the PREA Allegation System within the 24-hour period and are normally completed within three (3) – seven (7) days of being reported. However, some investigations can take longer due to limited information provided, such as those reported anonymously or by a third party, the completion of interviews, and pending results of forensic examination as applicable.

115.71(b) TDOC 502.06.2 states, “Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations.” A Sexual Abuse Response Team (SART member who has received special training in

conducting sexual abuse investigations in confinement settings shall investigate.

Interviews with the WTRC Institution Investigators and the TDOC OIC Special Agent confirmed each have received specialized training to conduct sexual abuse investigations pursuant to standard 115.34.

The WTRC Institution Investigators are members of the SART and assigned to conduct administrative investigations of alleged sexual abuse and sexual harassment. Training certifications for the completion for the WTRC Institution Investigators were identified as the following: National Institute of Corrections: PREA: Conducting Sexual Abuse Investigations in a Confinement Setting was provided.

The TDOC OIC Special Agents are sworn law enforcement officers and are authorized to conduct both administrative and criminal investigations. The OIC Special Agent completed extensive investigative training, including criminal investigative training and serves as a sworn law enforcement officer for the TDOC. Documentation of completion of a 16-hour coursework in Sexual Assault Investigation from the Law Enforcement Innovation Center Institution for Public Services was submitted for the assigned OIC Special Agent.

The review of the selected ten (10) investigative case files confirmed nine (9) were completed as administrative investigations by the WTRC Institution Investigators and one (1) was completed by the OIC Special Agent as a criminal investigation.

115.71(c) TDOC Index 502.06.2 indicates that OIC Special Agents 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.

Interviews with the OIC Special Agent and WTRC Facility Investigator identified the applicable following procedures when an investigation is initiated. The Shift Commander immediately contacts the WTRC Institution Investigators, and the initiation of each investigation is required to be uploaded in the PREA Allegation System within 24 hours upon being reported regardless of when by the institution investigators. The OIC Special Agents are contacted immediately when circumstances may be pursuant to criminal findings. The first step is ensuring staff initiate first responder duties by separating the victim and the aggressor and securing the crime scene area. If applicable the victim would be transported to the outside hospital for a forensic examination and clothing would be collected, with a chain of custody report. Lab work is transported to the Tennessee Bureau of Investigations for testing DNA sampling and completion of chain of custody. Review available video of the identified area, also review video to observe if staff's actions and/or failure to follow policy contributed to the assault, review inmate phone records to include those of other inmates, take photographs of affected cell/area and available evidence, photographs of victim and aggressor to include noted injuries, complete recordings of all interviews to include victim, aggressor and witnesses, and note medical evaluations to include forensic examinations results as applicable. All would be included in the investigative report and utilized in the determination of the investigative finding.

The ten (10) investigative case files were reviewed for timeliness, promptness, thoroughness and objectivity of the investigations. The review included seven (7) sexual abuse and three (3) sexual harassment reports that confirmed all investigations were initiated on the day of reported allegation.

The 10 investigations were completed as the following: five (5) investigations were concluded within five (5) days of the reported allegations; Four (4) investigative findings were determined within seven (7) days of being reported; One (1) investigative finding was concluded 22 days after reported.

Each investigation was identified as thoroughly and objectively completed. One (1) substantiated sexual abuse investigation included the collection of physical evidence that included written correspondence and self-admission of the aggressor's sexual abuse acts that was included in the criminal investigative report. The method of the third-party reporting identified was also included in the report.

The second substantiated sexual abuse investigation included the self-admission of prohibited acts of touching by the aggressor. The remaining eight (8) sexual abuse and sexual harassment allegations did not identify physical evidence for collection nor video capturing of the reported allegations.

Per interviews with investigative staff, an inmate's prior reports and complaints of sexual abuse involving the suspected perpetrator would already be known as the facility monitors all inmates identified as having a history as a potential aggressor and/or as an aggressor.

115.71 (d) TDOC Index 502.06 states that when the quality of evidence appears to support an administrative investigation, the Investigative Unit Special Agent conducts compelled interviews. When the quality of evidence appears to support criminal prosecution, the Investigative Unit Special Agent conducts a non-custodial interview or an interview under Miranda.

The OIC Special Agent indicated based on his extensive law enforcement experience, he is aware of acts identified criminal and those that are not and has never had a criminal case rejected, and therefore, he doesn't seek approval prior to conducting compelled interviews. However, he does maintain an open line of communication with the State District Attorney General as the two (2) agencies have established a good working relationship. He added two (2) investigative agents are involved in conducting investigations regarding staff.

One (1) substantiated staff on inmate sexual abuse case was referred for prosecution and the former contractor was convicted on the charge of Sexual Contract With Inmates. Although a second staff on inmate sexual abuse investigation was determined as substantiated, criminal charges were not identified for prosecution.

115.71(e) TDOC Index 502.06.2 and TDOC 502.06 outlines the mandate of the standard provision as the credibility of a victim, suspect, or witness, is assessed on an individual basis, and must be determined by the person's status as inmate or staff. Inmates who allege sexual abuse are not required to submit to a polygraph

examination or other truth telling devices as a condition for proceeding with the investigation of such an allegation.

The OIC Special Agent stated the credibility of an alleged victim, suspect, or witness is not a determining factor of the investigative finding. The investigative findings are based on evidence only and not the status of an individual. An inmate reporting sexual abuse would never to be requested to submit to a polygraph and/or any other truth-telling device.

The WTRC Institution Investigators stated the investigative findings are based on individual case by case findings and not on the status of inmate or staff. Inmates are not requested to submit to a truth-telling device.

Interviews with four (4) inmates who reported sexual abuse indicated neither were asked to submit to a polygraph or other truth telling devices upon reporting the allegation.

The review of the 10 PREA investigative case files supported there was no indication that an alleged victim was requested to participate in polygraphy or another truth-telling device. Interviews with four (4) inmates who reported an allegation of sexual abuse acknowledged they were not requested to submit to a polygraph or other truth telling device.

115.71(f) TDOC Index 502.06.2 and TDCO 502.06 outlines the mandate of the standard provision. Administrative investigations include an effort to determine whether staff actions or failures to act facilitated the abuse and shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative findings.

An interview with the OIC Special Agent indicated his office does not complete administrative investigations as these are completed by the WTRC Investigators. However, during the administrative investigation procedures, if the WTRC Investigator identify possible criminal activity, at that point he would complete the investigation.

Interviews with WTRC Investigators indicated when it is determined that staff actions or failure to act facilitated the abuse, the identified policy violations would be documented in a separate report and forwarded to Warden. There were zero investigative findings that revealed staff actions and/or failure to perform duties in accordance with agency policy contributed to the sexual abuse and/or sexual harassment.

Documentation of PREA case files, medical, mental health and inmate risk screening is stored electronically. Accessibility is given to authorized staff only within the specific department upon approval and the issuing of credentials for login accessibility. Hard copies of inmate medical and mental health records are maintained in the medical records office accessible to medical and mental health staff only. Inmate records are stored in secured cabinets in the records office that is manned by assigned staff and in the unit management office. Hard copies of PREA file cases are stored in secured file cabinets within the investigator's office accessible only to the

assigned investigators.

115.71(g) TDOC 502.06.2 and TDOC 502.06 states that criminal investigations are documented in a written report which contains a thorough description of physical, testimonial, and documentary evidence.

The review of the investigative case files confirmed the facility reported two (2) substantiated sexual abuse investigative findings throughout the review period. The investigative report documented testimonial evidence and a thorough description of the collected physical evidence as applicable per the investigative reports.

Interviews with the OIC Special Agent indicated the criminal investigations include all information gathered of the allegation occurrence to include the description of all physical evidence, documentary evidence, statements and interviews with the victim, aggressor, witness, to include photos, phone records, written correspondence, and applicable medical results such as forensic results, that support criminal charges.

115.71(h) TDOC Index 502.06.2 and TDOC 502.06 states, "Substantiated allegations of conduct that appear to be criminal shall be referred for prosecution. Per interviews with the OIC Special Agent, and WTRC Institution Investigators and review of the ten (10) investigative casefiles, two staff on inmate sexual abuse investigations were determined to be substantiated. However, only one (1) identified criminal acts and the aggressor was criminal prosecuted. The second substantiated staff on inmate sexual investigation did not identify criminal acts.

Per the PAQ, the number of substantiated allegations of conduct that appear to be criminal that were referred to for prosecution since the last PREA audit was one.

115.71(i) TDOC Index 502.06.2 and TDOC 502.06 state that such investigative records shall be retained for as long as the alleged abuser is incarcerated or employed by the Department, plus five (5) additional years. This practice was confirmed by the WTRC Institution Investigators and OIC Special Agent.

Administrative investigative case files are maintained in the PREA Allegation System (PAS) at the facility level and criminal investigations are maintained at the Office of Investigations and Conduct.

115.71(j) TDOC Index 502.06.2 and TDOC 502.6 state the departure of the alleged abuser or victim from employment or control of the facility or Department does not provide a basis for terminating an investigation.

Interviews with both the OIC Institution Investigator and OIC Special Agent confirmed although staff may resign during an investigation, the investigation continues to include the arrest and prosecution of staff when applicable. The OIC Special Agents have arrest authority throughout the state of Tennessee and will visit the home of a staff member as needed. Per the OIC Special Agent, if an allegation is reported after an inmate's release from TDOC, the OIC Special Agent would follow through with the assistance from the inmate's probation officer. If the allegation involves a staff member who have resigned, two (2) Special Agents would report to their home if they fail to cooperate. If the staff member resides outside of the state of Tennessee, the

	<p>assigned OIC Special Agent would request assistance from the law enforcement office within the respective state. The investigation would only discontinue due to the confirmed death of the victim or aggressor prior to conducting interviews.</p> <p>The review of the investigative case files confirmed that one (1) employee had previously resigned prior to the staff's notification of the staff on inmate sexual abuse allegation. The investigative report documented the investigative staff conducting an interview with the aggressor at their residence. The former employee was arrested and charged criminally.</p> <p>115.71 (k)(l) The Office of Investigations and Conduct is part of the Tennessee Department of Corrections and conducts its own criminal as well as administrative investigations into cases of sexual abuse and sexual harassment. This information was confirmed during interviews with WTRC Warden, TDOC Statewide PREA Coordinator, OIC Special Agent, WTRC Institutional Investigators, and WTRC PREA Compliance in addition to the review of the ten (10) investigative case files. Therefore, provisions (k) and (l) are not applicable.</p> <p>Based on the review of policy, ten (10) investigative case files, interviews and analysis, the facility does not meet all standard provisions.</p>
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115.72	Evidentiary standard for administrative investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08/01/2020) 3. TDOC 502.06 Prison Rape Elimination Act (PREA (Effective 10/21/2024) 4. Interviews with: <ol style="list-style-type: none"> a. WTRC Institution Investigators and Office of Investigations and Conduct (OIC) Special Agent <p>115.72(a) TDOC Index 502.06.2 states, "The Department shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse are substantiated."</p> <p>Per interviews with the OIC Special Agent and OIC Institution Investigator a preponderance of evidence is the standard necessary to substantiate an administrative allegation of sexual abuse or sexual harassment and a probable cause</p>

	<p>is for criminal investigations.</p> <p>Based on the review of agency policies and interviews with the assigned investigators, the facility does not meet compliance with the standard.</p>
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115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, and Sexual Assault Response Team (SART) (Effective 08/02/2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/24/2024) 4 TDOC PREA Status Notification CR-3984 5. Interviews with: <ol style="list-style-type: none"> a. WTRC Institution Investigators and Office of Investigations and Conduct (OIC) Special Agent b. Warden c. Inmates Who Reported Sexual Abuse <p>115.73(a) TDOC Index 502.06.2 and TDOC Index 502-06 states following an investigation into an inmate's allegation that he or she suffered sexual abuse in a facility, the Department shall inform the inmate in writing as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. The TDOC PREA Inmate PREA Allegation Status Notification form is utilized to document an inmate's notification of the investigative findings.</p> <p>Interviews with the Office of Investigations and Conduct (OIC) Special Agent, and WTRC Institution Investigators confirmed at the conclusion of each PREA investigation, the victim is notified of the investigative findings by the WTRC Institution Investigators. The victims are notified verbally and are asked to acknowledge by their signature on the Inmate PREA Allegation Status Notification, CR-3984. Upon a victim's refusal to sign the notification form, their refusal is witnessed by a second staff member. This procedure of the notification of the investigative findings to the victim was reiterated by the WTRC Warden.</p>

The PAQ identified the number of criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the agency/facility in the past 12 months as seven (7). Six were concluded as administrative and one (1) was concluded as criminal.

The PAQ noted of the alleged sexual abuse investigations that were completed in the past 12 months, the number of inmates who were notified, verbally or in writing, of the results of the investigation was seven (7).

Interviews with four (4) inmates who reported sexual abuse indicated they were informed of the investigative findings by the WTRC investigative staff.

115.73 (b) The TDOC employs investigators assigned to the Office of Investigations and Conduct identified as OIC Special Agents and OIC Facility Investigators who are authorized to conduct both administrative and criminal investigations. Each of the seven (7) sexual abuse investigations and three (3) sexual harassment investigations were completed by staff within the TDOC agency. Therefore, this provision is not applicable.

115.73(c) TDOC Index 502.06.2 and TDOC 502.06 states that following an inmate's allegation that a staff member has committed sexual abuse, the Department shall subsequently inform the inmate in writing whenever: the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at the facility; the staff member has been indicted on a charge related to sexual abuse within the facility; and the staff member has been convicted on a charge related to sexual abuse within the facility.

The facility reported three (3) staff on inmate sexual abuse allegations during the review period. The investigations were determined as the following: two (2) substantiated; one (1) unsubstantiated. The review of the investigative case files indicated all victims were advised of the investigative findings. One (1) victim of a substantiated staff on inmate sexual abuse investigation acknowledged by signature their notification of the following: "The employee is no longer posted in the inmate's unit; The employee is no longer employed at the facility." Criminal activity was not identified during the investigation; therefore, no further notification was required.

The aggressor of the second substantiated staff on inmate sexual abuse investigation resigned prior to agency staff's knowledge of the occurrence. Upon the completion of the investigation, the victim was notified of the following: (a) The employee is no longer post within the inmate's' unit; (b) The employee is no longer employed at the facility; (c) The employer has been indicted on a charge related to sexual abuse within the facility. Additionally, upon the former employee's conviction of "Sexual

	<p>Contact with Inmates,” the victim was notified of the following” The alleged abuser has been convicted on a charge related sexual abuse within the facility.”</p> <p>115.73(d) TDOC Index 502.06.2 indicates that following an investigation into an inmate’s allegation that he or she suffered sexual abuse in a facility, the Department shall inform the inmate in writing: whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded; Whenever the facility learns that an alleged abuser has been indicted on a charge related to sexual abuse within the facility; When the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</p> <p>The facility reported zero substantiated inmate on inmate sexual abuse and zero substantiated inmate on inmate sexual harassment investigative findings during the review period.</p> <p>115.73 (e) TDOC Index 502.06.2 states that all notifications shall be made in writing using Inmate PREA Allegation Status Notification, CR-3984, and the inmate shall acknowledge by signature that he/she has received such notification. The notification shall become part of the allegation file. If the inmate refuses to sign the acknowledgement, an additional staff member shall sign and date acknowledging the inmate refusal.</p> <p>The PAQ noted the number of notifications to inmates that were provided pursuant to this standard as five (5) and of those notifications made in the past 12 months, the number that were documented as five (5). However, this number was incorrect. The facility reported seven (7) sexual abuse allegations. Five (5) victims acknowledged by signature notification of the investigative findings. Two (2) refused to acknowledge by signature notification of the investigative findings. Their refusal was noted as witnessed by two (2) staff members. Therefore, documentation supports each of the seven (7) victims who reported sexual abuse were notified of the investigative findings pursuant to the standard.</p> <p>Additionally, the three (3) victims who reported sexual harassment were also documented as receiving notification of the investigative findings.</p> <p>Based on the review of agency policy, documentation of inmates’ notification of the investigative findings, interviews and analysis, the facility has demonstrated compliance with this standard.</p>
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115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review):

	<p>1. WTRC Completed Pre-Audit Questionnaire (PAQ)</p> <p>2. TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08/01/2020)</p> <p>3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/24/2024)</p> <p>4. TDOC Employee Code of Conduct</p> <p>5. PREA Investigative Casefiles</p> <p>115.76 (a) (b) (c) (d) TDOC Employee Code of Conduct states “An employee may not engage in, or allow another person to engage in, sexual activity with an inmate, probationer, or parolee, (hereby referred to as offenders). An employee may not encourage, threaten, or force an offender to have sexual relations with them or anyone else. There is no such thing as consensual sex between staff and offenders. The violation of this rule will result in disciplinary action up to and including termination and criminal prosecution.</p> <p>TDOC Index 502.06.2 and TDOC Index 502.06 outlines the mandate of the standard. Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse, sexual harassment, or PREA policies. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual touching only after conclusion of investigation. Sanctions shall be commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of the Department’s sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies (unless the activity was clearly not criminal) and to any relevant licensing bodies.</p> <p>The PAQ noted in the past 12 months, the number of staff from the facility who have violated agency sexual abuse or sexual harassment policies as zero. This was confirmed during the review of the investigative casefiles.</p> <p>Based on the review of agency policies, PREA investigative casefiles, the facility is compliant with all provisions of this standard.</p>
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115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <p>1. WTRC Completed Pre-Audit Questionnaire (PAQ)</p>

2. TDOC Code of Conduct

3.TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08/01/2020)

4. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/24/2024)

5. TDOC Index 115.01 Standards for Volunteers and Coordination of Community Involvement (Effective 02/15/2023)

6. Confirmation of Criminal Indictment

7. Documentation of Termination Notification

8. Interview:

a. Warden

115.77 (a) (b) TDOC Employee Code of Conduct states “An employee may not engage in, or allow another person to engage in, sexual activity with an inmate, probationer, or parolee, (hereby referred to as offenders). An employee may not encourage, threaten, or force an offender to have sexual relations with them or anyone else. There is no such thing as consensual sex between staff and offenders. The violation of this rule will result in disciplinary action up to and including termination and criminal prosecution.

TDOC Index 502.06.2 and TDOC 502.06 mandate any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies and if found to have engaged in sexual abuse or sexual harassment of an inmate shall be prohibited from further contact with any inmate.

TDOC Index 115.01 states that if after investigation it is necessary to limit the services of a volunteer, the approving authority shall notify the volunteer in writing of such action. The approving authority may restrict a volunteer to entering only the assigned TDOC location which shall be designated as the volunteer’s primary site. The approving authority may terminate the services of a volunteer, and such termination shall apply to all institutions.

Per interview with the Warden, upon a volunteer and/or contract worker identified as an aggressor in a sexual harassment and/or sexual abuse allegation, the contractor and/or volunteer authorization to enter the facility would be suspended pending the completion of an investigation. Only upon an investigative conclusion that the individual did not commit the prohibited act, would they be allowed for reenter. The contracting agency would be notified of the substantiated investigative findings and would be responsible for ensuring notification is made to their licensing agency. Central Office would be notified of volunteer removal. Criminal charges would be initiated as applicable for both contractors and volunteers. He concluded in stating, one (1) contractor was convicted of sexual contact with an inmate and another was

	<p>terminated.</p> <p>The facility reported two (2) substantiated staff on inmate sexual abuse were committed by contract employees. One (1) of the substantiated investigations identified criminal acts and the aggressor was convicted on the charge of “Sexual Contact with Inmates.” The second contractor was noted as removed and termination of clearance for entry. The investigative finding did not identify criminal activity. Zero allegations of sexual abuse and/or sexual harassment were reported against volunteers.</p> <p>Based on the review of agency policies, PREA case files, documentation of termination notification, criminal conviction, and interview with Warden, the facility is compliant with all provisions of the standard.</p>
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115.78	Disciplinary sanctions for inmates
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08/01/2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/24/2024) 4. TDOC Index 502.05 Definitions of Disciplinary Offenses 5. PREA Investigative Case Files 6. Interview with: <ol style="list-style-type: none"> a. Warden b. Behavioral Health Administrator <p>115.78 (a) TDOC Index 502.06 and TDOC Index 502.06.2 states, “Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. The facility reported in the past 12 months the number of administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility as zero (0).</p> <p>115.78 (b) TDOC Index 502.05 provides the definition of disciplinary offenses to include acts committed within the intent of the PREA standards in addition to allowable imposed sanctions. Disciplinary actions for the following are included: 1)</p>

Indecent Exposure (Class A; Rape (Class A); Sexual Battery (Class A); Sexual Harassment (Class B); Sexual Misconduct (Class B or C).

115.78 (c) TDOC Index 502.06 and TDOC Index 502.06.2 states that sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

The Warden confirmed imposed disciplinary sanctions are proportionate to the nature and circumstances of the abuse committed and the inmates' disciplinary histories and similar sanctions imposed on others. Administrative discipline would be imposed on an aggressor prior for substantiated sexual abuse prior to the inmate's criminal conviction. However, an inmate's mental health would be considered when imposing disciplinary sanctions that include input from mental health staff.

The review of the four (4) inmates on inmate sexual abuse and one (1) inmate on inmate sexual harassment investigations identified zero were concluded as substantiated.

115.78(d) TDOC Index 502.06. states, If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

Per an interview with the Behavioral Health Administrator, the facility does offer individual counseling to the offending individual in addition to the mental health counselors schedule support groups for victims of sexual abuse.

115.78 (e) TDOC Index 502.06 and TDOC Index 502.06.2 states an inmate may be disciplined for sexual contact with staff only upon finding that the staff member did not consent to such contact." The auditing team review of the two (2) substantiated staff on inmate sexual abuse investigations revealed disciplinary sanctions were not imposed on the victim.

115.78(f) TDOC Index 502.06 and TDOC Index 502.06.2 states, For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if the investigation does not establish evidence sufficient to substantiate the allegation. The auditing team's review of the four (4) reported inmate on inmate sexual abuse and one (1) sexual harassment investigations identified zero were identified as substantiated.

115.78 (g) TDOC Index 502.06.2 and s TDOC Index 502.06.2 states, "Any prohibition on inmate-on-inmate sexual activity shall not consider consensual sexual activity to constitute sexual abuse."

Based on a review of agency policies, PREA investigative case files, and interviews, the facility is compliant with all provisions of the standard.

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.3 Medical, Behavioral Health, Victim Advocacy, and Community Support Services for PREA Victims (Effective 08/01/2020) 3. TDOC 113.84 Clinical Assessments, Mental Health Appraisals, and Psychological Testing (Effective 01-15-2021) 4. TDOC 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 5. Roster of Inmate Risk Screening Results 6. TDOC Institutional Health Services Referrals (Mental Health) 7. Site Observation 8. Interviews with: <ol style="list-style-type: none"> a. Chief Counselor b. Staff Who Conduct Risk Screening c. Behavioral Health Administrator d. Inmates Who Disclosed Prior Victimization During PREA Screening <p>115.81 (a) (b) (c) TDOC Index 502.06, TDOC Index 113.84, TDOC Index 502.6.3 policies outline the mandate of the standard provisions.</p> <p>TDOC Index 502.06.3 and TDOC 502.06 states that, "If the screening process indicates that an inmate has experienced prior sexual victimization or has perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a referral to a medical and/or behavioral health provider within 14 days of the screening.</p> <p>TDOC Index 113.84 states that each mental health appraisal conducted as part of the initial classification or reclassification process shall be documented on Mental Health Intake Appraisal, CR-3772.</p> <p>Per the PAQ, in the past 12 months, 100% of inmates who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner.</p>

Per the PAQ, in the past 12 months, 100% of inmates who have previously perpetrated sexual abuse, as indicated during the screening, were offered a follow-up meeting with a mental health practitioner.

Per an interview with the Chief Counselor, and staff who conduct risk screenings, upon an inmate reporting or staff identifying an inmate has a prior history of sexual victimization or have previously perpetrated sexual abuse, a mental health referral is submitted. The inmates are seen within 14 days of their arrival. This procedure was confirmed by the Behavioral Health Administrative.

The facility reported that 49 inmates who arrived during the review period were referred to mental health based on their risk screening results. The auditing team selected to review 34 TDOC Institutional Health Services Referrals (CR-3431) that documented the inmate's referral to mental health based on the risk screening assessment. The TDOC Institutional Health Services Referrals (CR-3431) documented the date of referral, date received by mental health and the date the inmate was evaluated by a mental health practitioner. Documentation supported the 34 inmates were identified as the following: 25 individuals were identified with a prior history of sexual victimization; one (1) with a prior history of sexual aggressiveness; and seven (7) individuals with a history both prior sexual victimization and prior history of sexual abuse aggressiveness. Each of the 34 individuals were documented as assessed by a mental health practitioner within eight (8) days of the submitted referrals.

Interviews were conducted with four (4) inmates who reported prior sexual abuse during risk screening. These individuals identified meeting with mental health staff within the following timeframe: one (1) immediately; one (1) within a couple of days and two (2) were unable to identify the specific timeframe but acknowledged they were seen within two (2) weeks of arrival and reporting.

115.81(d) TDOC Index 502.06.3 and TDOC 502.06 notes any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and behavioral health practitioners and other staff, as necessary, to make informed treatment plans and security and management decisions, including housing, bed, work, education, and programs assignments, or as otherwise required by Federal, State, or local law.

Per an interview with the Chief Counselor, documentation of the risk screenings for all inmates to include those identified to have a prior history of sexual victimization and/or a history of abusiveness and that occurring in an institutional setting are maintained in the Distribute App program with limited access to authorized staff only. Authorized staff (Counselors) are granted access based on their duties and after approval by the Associate Warden of Treatment with final approval by Central Office. Staff have access for the identification of victims and abusers as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments but not the screening information. Inmates identified a victim, or an aggressor are never housed together.

The auditing team were granted access to review the Distribute App that confirmed

	<p>the electronic storage of inmate risk screening accessible to authorized staff through their personal login identification. Medical and mental health documentation is stored within secured medical files maintained in the medical department records office accessible to designated staff assigned to the area, the Health Services Administrative, Behavioral Health Administrative, and Charge Nurse on duty. Additionally medical and mental health records are also stored electronically with accessibility to authorized staff only by secured logins.</p> <p>115.81(e) TDOC Index 502.06.3 and TDOC Index 502.06 states Medical and Behavioral Health providers shall obtain informed consent from inmates before reporting about prior sexual victimization that did not occur in the institutional setting. Additionally, interviews with both medical and mental health staff verified all inmates are required to sign a consent form during their initial assessment during the intake process. Both stated as per their professional license, TDOC policy, and Tennessee law, they are mandatory reporters regardless of whether an inmate gave their consent.</p> <p>Based on a review of agency policies, mental health referrals, site observation, confirmation of secure electronic storage, secure room storage areas, and timely completion of submitted mental health referral, interviews and analysis, the facility is compliant with all provisions of the standard.</p>
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.3 Medical, Behavioral Health, Victim Advocacy, and Community Support Services for PREA Victims (Effective 08/01/2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (Effective 10-21-2021) 4. TDOC Index 113.30 Access to Health Care (Effective 5. TDOC 113.42 Communicable Disease (Effective 01/18/2024) 6. Interviews with: <ol style="list-style-type: none"> a. Health Services Administrator b. Behavioral Health Administrator c. Random Staff

d. Inmates Who Reported Sexual Abuse

115.82(a) TDOC Index 502.06 states victims of sexual abuse must receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and behavioral health providers, according to their professional judgment.

In accordance with TDOC Index 113.30, Inmates within the physical custody of the TDOC shall have timely access to the appropriate level of health care on a 24-hour a day basis. Health services shall be provided with respect to the inmate's autonomy and privacy, and without discrimination.

Interviews with the Health Services Administrator confirmed victims of sexual abuse receive timely, unimpeded access to emergency medical treatment. All victims are seen immediately upon being notified as medical staff are on duty 24/7 and are available to the inmate population. However, if a forensic medical examination is needed, medical staff would only provide emergency care without disturbing any physical evidence and the victim would be transferred to one of the outside hospitals, Regional One Hospital or Jackson General Hospital. Upon the victims' return, medical staff would follow the recommendations made by the SANE/SAFE and/or attending doctor at the local hospital. Continued medical treatment would be based on the WTRC medical staff's professional judgment and scope of practice. There were zero acts of sexual abuse that met the standards for a forensic medical examination.

An interview with the Behavioral Health Administrator indicated staff are normally scheduled 8:00 a.m. – 4:30 p.m., Monday – Friday. However, a mental health practitioner is scheduled on altered weekends. Victims of sexual abuse are normally seen within 24 hours or the next workday after reporting sexual abuse for crisis intervention services. The nature of the services provided is based on the staff's professional judgement in determining a treatment plan.

The auditing team requested documentation of the timeliness of emergency medical treatment and crisis intervention services provided for the seven (7) inmates who reported sexual abuse.

The review identified the medical assessments were completed as the following:

- Five (5) victims were assessed on the day of the reported sexual abuse allegations.
- One (1) victim was assessed eight (8) days after reporting the sexual abuse
- One (1) victim was assessed 15 days after the reported allegation.

The review identified the medical assessments were completed as the following:

- Four (4) were assessed within one (1) day of reporting.
- One (1) was assessed within eight (8) days of reporting.
- Two (2) were assessed within 19 days of reporting.

The auditing team conducted interviews with four (4) inmates who reported and/or were identified in sexual abuse investigations for confirmation of the timeliness of emergency medical treatment and crisis intervention services. Each of the four victims stated they were assessed by medical staff following reporting the sexual abuse. All four (4) acknowledged they are on the mental health caseload and were seen on the day of reporting or within a week of reporting.

115.82 (b) TDOC Index 502.06.3 and TDOC 502.06 states, "If no qualified medical staff are on duty at the time of a report of a recent abuse is made, a correctional officer trained to render first aid may help as needed." Medical staff are on duty 24/7 daily at WTRC to provide medical treatment as needed.

Interviews with random and specialized staff confirmed they were aware that medical staff would be notified of reported PREA allegations by the Shift Commander. Staff would notify their immediate supervisor, and/or the Shift Commander who would ensure the victim was assessed by medical staff.

Medical staff are scheduled 24/7 to provide medical services. However, the Shift Commander completes the TDOC Sexual Abuse Incident Check Sheet PREA of 2003, (CR 3776) for each reported sexual abuse while documenting the date and time of all notifications to include those to medical and mental health. This form is included in the investigative packet.

115.82 (c) TDOC Index 502.06.3 and TDOC 502.06 indicate that inmate victims of sexual abuse, while incarcerated, shall be offered tests for sexually transmitted infections and sexually transmitted infections prophylaxis in accordance with professionally accepted standards of care and as medically appropriate. Victims of sexual abuse that include vaginal penetration while incarcerated, are offered pregnancy tests and timely information about and access to all pregnancy-related medical services that are lawful in the community.

Per TDOC Index 113.42 in the event of positive STD results, measures must be taken to ensure the confidentiality of the information during the course of examination, treatment, follow-up, and surveillance. Inmates within the physical custody of the TDOC who are reported as contacts to the infected case (as determined by the health department investigator/interviewer) will be located and provided confidential examination, and treatment, as appropriate.

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

Interviews with the Health Services Administrator, all victims of sexual abuse would be offered testing for sexually transmitted infections to include HIV, STD and Hepatitis in addition to follow up testing through lab work and medication as needed. The process would be initiated at the outside hospital if the victim is transported for a forensic examination and all follow-ups' services would be continued at the WTRC by medical staff. The victim would also be offered timely information and access to

	<p>emergency contraception.</p> <p>Interviews were conducted with four (4) of the seven (7) inmates who reported sexual abuse. All stated the sexual abuse reported did not require testing for emergency medical treatment, testing for sexually transmitted infections prophylaxis access to emergency contraception and/or access to emergency contraception.</p> <p>The review of the seven (7) sexual abuse investigative case files confirmed zero reports identified acts that warranted the receipt of a forensic examination and/or an offer for HIV, STD and Hepatitis testing, access to emergency contraception sexually transmitted infections prophylaxis, and/or follow-up treatment.</p> <p>115.82 (d) TDOC Index 502.06.3 and TDOC 502.06 indicate treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with the investigation. Interviews with the Health Services Administrator, and Behavioral Health Administrator confirmed the inmate population does not incur any financial obligations for the treatment of services to include those provided within the facility and/or any treatment provided by an outside medical facility.</p> <p>Based on the review of agency policies, review of documented medical and mental health services, the facility implementation and practices in applying corrective measures to meet compliance during the audit phase, WTRC does meet all provisions of the standard.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.03 Medical, Behavioral Health, Victim Advocacy, and Community Support Services for PREA Victims (Effective 08/01/2020) 3. TDOC 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 4. TDOC Index #113.30 Access to Health Care (Effective 02/01/ 2022) 5. TDOC Index #113.42 Communicable Diseases (Effective 01/18/2024) 6. Sexual Abuse Case Files 7. Interviews with:

a. Health Services Administrator

b. Behavioral Health Administrator

c. Inmates who reported sexual abuse

115.83 (a) TDOC Index 502.06.3 and TDOC 502.06 outline the mandate of the standard provision. The facility offers medical and behavioral health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any confinement setting. The policies outline services required in the event of sexual abuse.

TDOC Index #113.30 states Inmates within the physical custody of TDOC shall have timely access to the appropriate level of health care on a 24-hour a day basis. Health services shall be provided with respect to the inmate's autonomy and privacy, and without discrimination. The Health Administrator shall generate institutional written procedures to ensure the routine and emergency health care services are accessible to all inmates in a timely manner.

115.83 (b) TDOC Index 502.06.3 and TDOC 506.2 dictates the evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans and when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. TDOC facilities offer follow-up services within the correctional facilities.

Per interviews with both the Mental Health Administrator and Health Services Administrator, victims of sexual abuse would be offered follow-up services throughout their assignment at the facility and transfer to other TDOC facilities. Upon an inmate's release from TDOC custody into the community, Case Managers within each department arrange for continued treatment services within the inmate's release area. The respective case managers maintain a list of agencies and available services within each county throughout the state of Tennessee to arrange appropriate treatment services and the inmates are seen scheduled to be seen 24 hours of their release from TDOC custody.

Interviews with four (4) inmates who reported sexual abuse indicated each were previously assigned to the mental health caseload and attend regular meetings with their counselor for matters other than their report of sexual abuse and were aware of the support groups offered. Documentation of follow-up mental health services following the initial assessments was provided for review. The reported sexual abuse did not include actions that met the requirement of follow-up medical services.

115.83 (c) TDOC 502.06.3 and TDOC 502.6 indicates the facility shall provide such victims with medical and behavioral health services consistent with the community level of care. Interviews with medical and mental health practitioners indicated the level of care provided to the inmate population is nothing less than that of an equal level of care to those individuals within the community.

115.83 (d) (e) TDOC 502.06 and TDOC 502.06.3 notes victim of sexually abusive

vaginal penetration while incarcerated are offered pregnancy tests and timely information about and access to all pregnancy-related medical services that are lawful in the community.

WTRC does house a female inmate population. However, the review of the sexual abuse investigative case files confirmed there were no reported allegations of sexually abusive vaginal penetration. Therefore, there were zero circumstances in which the offer of a pregnancy test and/or required access to pregnancy-related medical services was applicable.

An interview with the Health Services Administrator indicated pregnancy tests would be offered and upon receiving positive results, the victim would be transferred to the TDOC Debra K. Johnson Rehabilitation Center where a full-time OBGYN is on-site. The victims would be informed of their accessibility to all lawful pregnancy-related medical services as in accordance with the community.

115.83 (f) TDOC 502.06.3 and TDOC 502.6 states that inmate victims of sexual abuse, while incarcerated, shall be offered tests for sexually transmitted infections and sexually transmitted infections prophylaxis in accordance with professionally accepted standards of care.

Per TDOC Index 113.42 in the event of positive STD results, measures must be taken to ensure the confidentiality of the information during the course of examination, treatment, follow-up, and surveillance. Inmates within the physical custody of the TDOC who are reported as contacts to the infected case (as determined by the health department investigator/interviewer) will be located and provided confidential examination, and treatment, as appropriate.

Prophylaxis treatment with immune serum globulin (IG) must be made available or acute Hepatitis A contacts as clinically indicated and prescribed by the physician. A written order for contact precautions is required whenever patient care requires body-to-body or surfaces to-body contact (e.g., turning or bathing a patient, diapering, or caring for incontinent patients).

115.83 (g) TDOC Index 502.06.3 and TDOC 502.6 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. Per the medical and mental health practitioners, the victim would not suffer any financial cost for treatment services.

Interviews with four (4) victims of sexual abuse indicated at no time were they requested to provide payment for the medical and or mental health services received. However, none received services outside of the WTRC facility.

115.83(h) TDOC Index 502.06.3 and TDOC Index 502.06 state all facilities shall attempt to conduct a behavioral health evaluation of all known inmate-on-inmate abusers within 14 days of learning of such abuse history. They shall be offered treatment when deemed appropriate by behavioral health providers.

	<p>Two (2) staff on inmate sexual abuse investigation were concluded as substantiated. There were zero inmate on inmate substantiated sexual abuse investigative findings during the review period. Therefore, an evaluation of the abuser was not applicable. Per the Mental Health Administrator, an inmate identified as the abuser has an option of accepting participation in a sex offender program.</p> <p>Based on the review of policies, investigative case files, medical and mental health documentation, interviews and analysis, the facility is compliant with all provisions of this standard.</p>
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06.2 PREA Allegations, Investigations, Sexual Assault Response Team (SART) (Effective 08-01-2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 4. WTRC Sexual Abuse Incident Review Summaries 5. Interviews with: <ol style="list-style-type: none"> a. Warden b. WTRC PREA Compliance Manager c. Incident Review Team Member <p>115.86 (a) (b) (c) TDOC 502.06.2 and TDOC 502.06 outlines the mandate of the standard. The facility conducts a Sexual Abuse Incident Review Report, CR-3985, at the conclusion of every sexual abuse investigation, unless the allegation has been determined to be unfounded. Such reviews occur within 30 days of the conclusion of the investigation. The review team includes the Warden/Superintendent/designee, Associate Warden of Treatment/Deputy Superintendent/Assistant Warden at privately managed facilities, facility and OIC Institution Investigator, line supervisor, and medical/mental health professionals. These individuals are members of the Sexual Assault Response Team (SART) whom duties include but not limited to meeting monthly to discuss and review substantiated and unsubstantiated sexual abuse cases.</p> <p>The PAQ noted five (5) criminal and/or administrative investigations of alleged sexual abuse completed during the 12-month review period that were followed by a sexual</p>

abuse incident review within 30 days, excluding only unfounded incidents. The facility identified two (2) sexual abuse investigations were concluded as substantiated and three (3) were concluded as unsubstantiated.

The incident reviews were documented as completed by members of the Sexual Assault Response Team (SART) that included to the following positions: WTRC PREA Compliance Manager, WTRC Institution Investigator; Mental Health Professional; Medical Professional, and WTRC PREA Coordinator/Associate Warden, SART members and Warden.

Per an interview with the WTRC Warden, the facility's Incident Review Team is composed of members of the facility's Sexual Abuse Response Team (SART)) who meets monthly to discuss and review all reported sexual abuse and sexual harassment allegations within 30 days of the completed investigations with the exception of those identified as unfounded. SART does consist of supervisory staff as outlined within the standard.

115.86 (d) (e) TDOC 502.06.2 and TDOC 502.06 require the review team a) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; b) Consider whether the incident or allegation was motivated by race, ethnicity, gender identity, gay, bisexual, transgender, or intersex identification, status, or perceived status, gang affiliation, or other group dynamics at the facility; c) Examine the area within the facility or facility grounds where the incident allegedly occurred to assess whether in the area may enable abuse; d) Assess the adequacy of staffing levels in that area during different shifts; e) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; f) Prepare a report of its findings, including but not limited to, determinations made in accordance with the policies and any recommendations for improvement and submit such report to the Warden/ Superintendent.

The auditing team requested documentation of the incident reviews for all sexual abuse investigations with the finding of substantiated and/or unsubstantiated that included two (2) substantiated and three (3) unsubstantiated. Each of the incident reviews was documented as completed by SART members within 30 days of the completed investigations.

The WTRC PREA Compliance Manager is also a member of the SART. She indicated SART meetings are held monthly where the members review and discuss in detail the circumstances of the investigations while identifying any areas of concern that could have contributed to the occurrence to include the following: possible blind spots and physical barriers, insufficient staffing level, a need for change in policy or procedures, need for additional staff training, any possible circumstances that could have contributed to the assault to include the victim's status or perceived status as gay, transgender, intersex, based on their race and/or any gang affiliation. The Associate Wardens of Security and Treatment are included in the review and recommendation for approval that are forwarded to the Warden.

The WTRC Warden confirmed SART members are assigned to conduct the incident

	<p>reviews during the scheduled monthly meetings. The SART is composed of the PREA Compliance Manager, institution investigators, medical and mental health professionals, line staff supervisors, and Associate Wardens/WTRC PREA Coordinator. The incident reviews provide an opportunity to identify corrective measures needed to prevent further incidents of sexual assaults while identifying if there are better procedures that could have been done to include the need for a change in policy, installation of cameras or mirrors, and the basis of possible motivation of the occurrence. The installation of cameras in the educational classrooms was based on the finding of a substantiated sexual abuse investigation. Additional procedures were implemented that included office doors are required to remain open during opposite gender meetings with the inmate population.</p> <p>The auditing team reviewed the sexual abuse Incident Review reports for the substantiated and unsubstantiated investigative findings that confirmed the SART members documented their assessment review of the area in the facility where the incident occurred to assess whether physical barriers to the area that may have enable abuse, video monitoring capabilities and/or need of, adequacy of staffing levels in that area during the time of the alleged assault and different shift, whether the allegations or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse, and/or consider the area of the occurrence; and the motivation consideration for the occurrence to include whether the incident or allegation was motivated by race, ethnicity, gender identity, LGBT identification, status or perceived status, or gang affiliation, or was motivated or caused by other group dynamics of the facility may have enabled the abuse.</p> <p>SART members identified the following policy implementations during the incident reviews: All male counselors must leave their door open when speaking with residents; The closet in the class should only be unlocked with two (2) staff present. The SART also identified the need for increased monitoring technology that included the installation of cameras in the classrooms. The cameras were previously installed prior to the site observation.</p> <p>Based on the review of the agency's policy, incident reviews, interviews and analysis, the facility is compliant with all provisions of this standard.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06 Prison Rape Elimination Action (PREA) Implementation, Education, Compliance (Effective 08/02/2020)

3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024)

4. 2023 Annual SSV PREA Report

5. Department of Justice Requested Submission Correspondence

6. Interview:

a. TDOC Statewide PREA Coordinator

115.87(a) (b) (c) (d) (e) (f) TDOC Index 502.06 policies outlines the mandate of the standard provisions.

115.87 (a) Staff shall collect accurate uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. The review of the agency policy confirms the definitions are included. TDOC shall aggregate the incident-based sexual abuse data at least annually. Per an interview with the Statewide PREA Coordinator, data is collected by the Decision Support: Research and Planning Development Department using the Department of Justice annual reporting format and the set definitions identified in TDOC Index #502.06.

115.87(b) TDOC shall aggregate the incident-based sexual abuse data at least annually. The Statewide PREA Coordinator shall ensure that data collected is securely retained. The Statewide PREA Coordinator shall review data collected and aggregated in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training.

115.87(c) The Statewide PREA Coordinator provided a copy of the most recent SSV report that demonstrated that the data collected by the facility is at least sufficient to answer all questions on the survey conducted by the Department of Justice, the Survey of Sexual Violence.

115.87(d) TDOC shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigative files, and sexual abuse incident reviews.

115.87(e) The Statewide PREA Coordinator shall ensure that data collected is securely retained. TDOC shall make all aggregated sexual abuse data, from TDOC facilities and private facilities with which it contracts, readily available to the public at least annually through the TDOC website. The submitted SSV-2 report included substantiated sexual abuse allegations within the private contracted facilities.

115.87(f) Policies indicate that a report prepared by the TDOC Statewide PREA Coordinator shall be prepared utilizing the Department of Justice annual format. The facility provided a copy of 2023 SSV-2. Per the TDOC Statewide PREA Coordinator, the most recent SSV-2, which was for calendar year 2023. Due to difficulty in accessing the SVV program, TDOC was granted access on December 27, 2024, for the upload of the SSV-2 documentation. This information was confirmed through email correspondence between the TDOC Deputy Inspector General and the Survey of Sexual Victimization, Project Manager.

	Based on the review of policies, SSV-2 Report, agency website, email correspondence, interviews and analysis, the facility is compliant with all provisions of this standard.
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115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site review):</p> <ol style="list-style-type: none"> 1. WTRC Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index 502.06 Prison Rape Elimination Action (PREA) Implementation, Education and Compliance (Effective 08/02/2020) 3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 4. TDOC Agency Website 5. Fiscal Year 2023 - 2024 Annual PREA Report 6. Interviews with: <ol style="list-style-type: none"> a.TDOC Statewide PREA Coordinator b. Agency Head Designee c. WTRC PREA Compliance Manger <p>115.88 (a) (b) (c) (d) The TDOC Index 502.06 policies address the requirement of this standard. The Directive indicates that TDOC staff shall aggregate incident-based sexual abuse data annually; Maintain review and collect data as needed from all available incident-based documents, including reports, investigative files, and sexual abuse incident reviews; Ensure that all aggregated sexual abuse data is included in an annual report that includes an assessment of the Department’s sexual abuse prevention, detection, and response policies, practices, and training; If applicable, identifies Department-wide problem areas or problems within specific correctional facilities; Is used to facilitate corrective action at the Department and correctional facility levels; compares the current calendar year’s data and activities with that available from previous years; Assesses the Department’s progress in addressing sexual abuse; and is approved by the Commissioner and made readily available to the public through the Department’s website. Personal identifiers shall be removed prior to the data being made publicly available.</p> <p>Per an interview with the Agency Head Designee, the agency does use the incident-based sexual abuse data to assess and improve sexual abuse prevention, detection, and response policies, practices, and training. As incidents are reported and investigated, trends are identified (i.e. regarding the time, location, staff involved</p>

	<p>etc.). As the trends are identified, processes and policies are refined to ensure the adequate addressing of any issues found. If there is a deficiency noted that can be corrected with additional training, it is arranged. If there is an issue that needs to be clarified, a memorandum of instruction is issued. The retaliation monitoring that staff conduct for victims and staff reporters was born out of trends observed. The Annual PREA Report is prepared by the TDOC Statewide PREA Coordinator and submitted through the Director of Compliance for the Commissioner's review and approval. Once approved, the report is posted on the TDOC website.</p> <p>Per the WTRC PREA Compliance Manager, the agency does review data collected and aggregated pursuant to 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detections, and response policies, and training. As the facility PREA Compliance Manager she is responsible for gathering and submitting accurate information to the Associate Warden (T)/WTRC PREA Coordinator for submission to the TDOC Statewide PREA Coordinator.</p> <p>TDOC Statewide PREA Coordinator confirmed the agency reviewed data collected and aggregated pursuant to standard 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training. When the data shows that corrective action measures are needed, immediate actions are taken to ensure PREA compliance, and the safety of staff and inmates. She completes an Annual Report that is submitted to the Commissioner for review. Once the Commissioner reviews and approves the report, it is posted on the agency's public website. Typically, the agency's Annual Reports does not contain sensitive information that needs to be redacted, as such information is excluded and would not be included in the report.</p> <p>The auditing team reviewed the agency's website and verified that the TDOC Annual PREA Reported for FY 2023 – 2024 was published and made available to the public. The Annual Report included a comparison of fiscal years of 2022 -2023 and 2023 – 2024.</p> <p>Based on a review of policy, website, Annual Report, interviews and analysis, the agency is compliant with all provisions of this standard.</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence Reviewed (documents, interviews, site observation)</p> <p>1.WTRC Completed Pre-Audit Questionnaire (PAQ)</p> <p>2. TDOC Index 502.06 Prison Rape Elimination Action (PREA) Implementation, Education, and Compliance (Effective 08-02-2020)</p>

3. TDOC Index 502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024)

4. TDOC agency website

5. Interview with:

a. TDOC Statewide PREA Coordinator

115.89 (a) (b) (c) (d) The TDOC Index 502.06 policies govern the mandate of the standard provisions.

The policies indicate the TDOC PREA Coordinator shall ensure that the data collected is securely retained. Per an interview with the TDOC Statewide PREA Coordinator, data is securely maintained for at least 10 years in a computerized system and accessible to authorized staff only.

The site observation and interviews with investigative staff confirmed the PREA investigative case files are stored electronically in the PREA Allegation System accessible only to agency investigators through password protection. Hardcopy files are secured in file cabinets within the investigative department with key entry accessibility limited to the assigned facility investigative staff.

Inmate medical and mental health files are maintained electronically with password protection. Individual hardcopy files that are secured in the medical records office with limited staff accessibility. The records office was observed manned by the medical records clerk.

The inmate risk screening documentation is only stored electronically and is accessible to designated staff based on their official role. All electronically stored data is password protected. Inmate individual files are secured in the record office that is manned by designated record office clerks.

115.89 (b) TDOC Index 502-06 states the TDOC Statewide PREA Coordinator ensures the data collected is securely retained. TDOC makes all alleged sexual abuse data, from TDOC facilities and private facilities with which it contracts, readily available to the public at least annually through the TDOC website.

The auditing team reviewed the TDOC website at <https://www.tn.gov/correction/sp/prison-rape-elimination-act.html> and confirmed the publishing Annual Reports were accessible for viewing by the public.

115.89 (c) TDOC 502-06 states Personal identifiers are removed prior to the data being made publicly available. The TDOC Statewide PREA Coordinator maintains sexual abuse data collect for at least ten years after the initial collection unless federal, state or local law requires otherwise.

The auditing team reviewed the TDOC website at <https://www.tn.gov/correction/sp/prison-rape-elimination-act.html>, and confirmed personal identifiers were excluded from the reports.

115.89 (d) TDOC 502-06 states the TDOC Statewide PREA Coordinator maintains

	<p>sexual abuse data collected for at least ten years after the date of the initial collection unless federal, state, or local law requires otherwise.</p> <p>The following historical Annual PREA Reports were submitted for review: FY 13-14; FY 15-16; FY 17-18; FY 19-20; FY 22-23.</p> <p>Based on the review of TDOC policies, agency website, site observation and staff interview, the TDOC agency and facility is compliant with all provisions of this standard.</p>
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115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>401. (a) This is the third year of the fourth audit cycle. The review of the TDOC agency website at https://www.tn.gov/correction/sp/prison-rape-elimination-act-.html, confirmed PREA Audit Final Reports were posted for each of the 11 correctional facilities under TDOC management throughout the third cycle and the second year of the fourth cycle.</p> <p>401. (b) The auditing team reviewed the TDOC website at https://www.tn.gov/correction/sp/prison-rape-elimination-act.html, confirmed the agency ensured that at least one-third of agency facilities to include those operated by a private organization on behalf of the agency was audit each one year period. However, an Interim PREA Report was submitted for one (1) of the four (4) contract facilities.</p> <p>401. (h) The auditing team was provided with full access to all buildings and areas during the site observation. Areas observed during the site visit included but were not limited to the following all housing units, food service, visitation, medical, mental health, administrative offices, inmate program areas, maintenance, warehouse, mailroom, religious services, observation of inmate risk screening, and inmate PREA orientation.</p> <p>401 (i) The auditing team was provided with all requested documentation to include extensive files throughout the audit process to support a conclusion of compliance with PREA standards. The documentation review included sufficient sampling based on the size of the facility of inmate PREA risk screenings, staff and inmate training records, investigative reports, medical and mental health documentation, transgender bi-annual assessments, staff background investigations, and additional program information and documents.</p> <p>401.(m) The auditing team was provided with individual office space to conduct all inmate and staff interviews within private settings. Interviews were conducted with random and specialized staff in addition to random and target group inmates.</p>

	<p>401. (n) The PREA Audit Notice was provided to the facility by the Lead Auditor and noted as posted on March 10, 2025, an excess of six weeks prior to the site observation. The PREA Audit Notice was observed posted throughout WTRC to include the front entrance, visitation, recreation, food services, program areas, administration, segregation units, intake, mental health, medical, and all housing units accessible for viewing by inmates, staff, volunteers and contractors. Interviews with staff to include contractors and volunteers and the inmate population, acknowledged observance and awareness of the posting.</p> <p>An interview with staff assigned to the mailroom confirmed the inmates' outgoing mail is sealed by the inmates unless identified for monitoring due to security concerns per the Warden. Outgoing mail addressed to the PREA Auditors would have been treated as confidential and legal mail. The auditing team did not receive any written correspondence nor verbal requests from the inmate population or staff during the site observation to participate in the interview process.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Per TDOC directives and standard requirements, TDOC ensures all final reports will be published on the agency's website accessible for viewing to the public. A review of the TDOC's website at www.tn.gov/correction/sp/prisonrape-elimination-act.html contained the final 15 previous PREA reports completed for TDOC to include four (4) contract facilities

Appendix: Provision Findings**115.11 (a) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**

Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
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Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
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115.11 (b) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Has the agency employed or designated an agency-wide PREA Coordinator?	yes
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Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
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Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
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115.11 (c) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
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Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
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115.12 (a) Contracting with other entities for the confinement of inmates

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

Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	yes
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	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

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

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

	facility does not have female inmates.)	
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

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

	may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

115.17 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

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

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b) Policies to ensure referrals of allegations for investigations		
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c) Policies to ensure referrals of allegations for investigations		
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
115.31 (a) Employee training		
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

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

	Garrrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicious of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	yes
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective	yes

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

	Whether the inmate is detained solely for civil immigration purposes?	
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive	yes

	information is not exploited to the inmate's detriment by staff or other inmates?	
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would	yes

	present management or security problems?	
115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing	yes

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
115.43 (c)	Protective Custody	

	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d) Protective Custody		
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e) Protective Custody		
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a) Inmate reporting		
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b) Inmate reporting		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

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

	of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial 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
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes

	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

	abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

	evidence sufficient to substantiate the allegation?	
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse	

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	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.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403	Audit contents and findings	

(f)	
	<div data-bbox="320 185 1273 555"> <p>The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)</p> </div> <div data-bbox="1302 185 1353 219">yes</div>