

PREA Facility Audit Report: Final

Name of Facility: Debra K. Johnson Rehabilitation Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 05/09/2026

Auditor Certification

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



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



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



Auditor Full Name as Signed: Debra D. Dawson

Date of Signature: 05/09/2026

AUDITOR INFORMATION

Auditor name: Dawson, Debra

Email: dddawsonprofessionalaudits@gmail.com

Start Date of On-Site Audit: 03/25/2026

End Date of On-Site Audit: 03/27/2026

FACILITY INFORMATION

Facility name: Debra K. Johnson Rehabilitation Center

Facility physical address: 3881 Stewarts Lane, Nashville, Tennessee - 37243

Facility mailing address:

Primary Contact

Name:	Ashlee Wheeler
Email Address:	ashlee.wheeler@tn.gov
Telephone Number:	615-626-9529

Warden/Jail Administrator/Sheriff/Director

Name:	Jordan Clark
Email Address:	Jordan.L.Clark@tn.gov
Telephone Number:	615-741-1255

Facility PREA Compliance Manager

Name:	Kaitlyn Pennington
Email Address:	Kaitlyn.M.Pennington@tn.gov
Telephone Number:	615-741-4699
Name:	Ashlee Wheeler
Email Address:	ashlee.wheeler@tn.gov
Telephone Number:	615-350-3925
Name:	Denise DeAnjalo
Email Address:	denise.l.deanjelo@tn.gov
Telephone Number:	

Facility Health Service Administrator On-site

Name:	Kelli Moore
Email Address:	kmoore5@teamcenturion.com
Telephone Number:	615-741-4678

Facility Characteristics

Designed facility capacity:	812
Current population of facility:	627
Average daily population for the past 12 months:	598
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Women/girls
Age range of population:	21-78
Facility security levels/inmate custody levels:	Minimum, Medium, Close, Max, Death Row
Does the facility hold youthful inmates?	Yes
Number of staff currently employed at the facility who may have contact with inmates:	237
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	121
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	150

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:	4233304328

Agency Chief Executive Officer Information:

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	
The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met. Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.	
Number of standards exceeded:	
0	
Number of standards met:	
45	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

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

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-03-25
2. End date of the onsite portion of the audit:	2026-03-27

Outreach

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

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	812
15. Average daily population for the past 12 months:	598
16. Number of inmate/resident/detainee housing units:	15
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	☒ Yes ☐ No ☐ Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	622
24. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	0
25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	122
26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	16
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	25
28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	22
29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0

30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	99
31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	30
32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	8
33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	265
34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	The number of inmates noted as transgender include those who identified as gender nonconforming
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	236

37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	176
38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	122
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	15
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☒ Age ☒ Race ☒ Ethnicity (e.g., Hispanic, Non-Hispanic) ☒ Length of time in the facility ☒ Housing assignment ☐ Gender ☒ Other ☐ None
If "Other," describe:	Those who identified as transgender and those who identified as gay.

42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Rosters that included the requested information were provided
43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	☒ Yes ☐ No
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	16
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".	
46. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/detainees. ☐ The inmates/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/detainees).	Inmate roster identified no inmates under the age of 18.
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	3
48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	2
50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	3

51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Zero inmates were housed at the facility whom first language was not that of the English language
52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	1
53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	1
54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	3

55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	2
56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	Interviews with investigative staff, Warden and Facility PREA Coordinator noted inmates are risk of sexual victimization are not placed in segregated housing.
57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
58. Enter the total number of RANDOM STAFF who were interviewed:	16

59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☐ Length of tenure in the facility ☐ Shift assignment ☐ Work assignment ☐ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
If "Other," describe:	Gender of staff, time of employment at the facility.
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	☒ Yes ☐ No
61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	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.	
62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	26
63. Were you able to interview the Agency Head?	☒ Yes ☐ No

64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	☒ Yes ☐ No
65. Were you able to interview the PREA Coordinator?	☒ Yes ☐ No
66. Were you able to interview the PREA Compliance Manager?	☒ Yes ☐ No ☐ NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	☒ Other
If "Other," provide additional specialized staff roles interviewed:	Food Services, TRICOR
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	☒ Yes ☐ No
a. Enter the total number of VOLUNTEERS who were interviewed:	2
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	☒ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☐ Religious ☐ Other
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	☒ Yes ☐ No
a. Enter the total number of CONTRACTORS who were interviewed:	7
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	☐ Security/detention ☐ Education/programming ☒ Medical/dental ☒ Food service ☐ Maintenance/construction ☐ Other

70. Provide any additional comments regarding selecting or interviewing specialized staff.	Numerous medical and mental health staff are contractors.
SITE REVIEW AND DOCUMENTATION SAMPLING	
Site Review	
PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.	
71. Did you have access to all areas of the facility?	☒ Yes ☐ No
Was the site review an active, inquiring process that included the following:	
72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	☒ Yes ☐ No
73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	☒ Yes ☐ No
74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	☒ Yes ☐ No

75. Informal conversations with staff during the site review (encouraged, not required)?	☒ Yes ☐ No
76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	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.	
77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	☒ Yes ☐ No
78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	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.	

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	4	0	4	0
Staff-on-inmate sexual abuse	5	0	5	0
Total	9	0	9	0

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	4	0	4	0
Staff-on-inmate sexual harassment	8	0	8	0
Total	12	0	12	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	1	1	2
Staff-on-inmate sexual abuse	0	1	3	1
Total	0	2	4	3

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	3	0	1
Staff-on-inmate sexual harassment	0	5	2	1
Total	0	8	2	2

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

8

86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	4
88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	4
91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	6
94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files

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

4

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

☐ Yes

☒ No

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

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

☒ Yes

☐ No

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

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

No text provided.

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

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

☒ Yes

☐ No

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

1

Non-certified Support Staff

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

☐ Yes

☒ No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

☒ The audited facility or its parent agency

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

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

☐ Other

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): - Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) - TDOC Index #502.06 Administrative Policies and Procedures (PREA) (Effective 10/21/2024) - TDOC Index #305.03 Administrative Policies and Procedures (Employee/Offender Interaction) (Effective 05/15/2020) - DJRC Index #502.06.2-1 Prison Rape Elimination Act (PREA) Allegations, investigations, and Sexual Abuse Response Teams (SART) - TDOC #502.05 Definitions of Disciplinary Offenses (Effective 08/16/2023) - TDOC Office of Inspector General Organizational Chart

8. DJRC Organizational Chart

9. DJRC PREA Compliance Manager Position Assignment

10. Interviews with:

a. Director of External Compliance/TDOC Statewide PREA Coordinator

b. DJRC PREA Compliance Manager

115.11(a) TDOC Index #502.06 states it is the policy of the TDOC to provide a safe, human, and 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. The policy further notes the agency has an absolute zero tolerance towards sexual acts between staff and inmates, as well as between inmates. Any sexual abuse or sexual harassment between employees and inmates is inconsistent with the professional, ethical principles, and policies of the TDOC. All allegations of sexual abuse/sexual harassment will be reported and investigated.

The policy also includes definitions in relation to PREA, and procedures for response upon receiving a report that includes but are not limited to the following: Zero Tolerance Statement and Confidentiality; Inmate Orientation and Education; Staffing Patterns; PREA Inspections; Training; Screening/Assessing Inmates at Diagnostic Centers; Additional Screening /Assessments; Housing and Programming; Referrals and Monitoring; PREA Allegations; PREA Reporting; Responsibilities of First Responders; Investigations; Sexual Abuse Response Team (SART); Access to Medical and Behavioral Health Services; Access to Facility and Outside Support Services; Sexual Abuse Incident Reviews; Monitoring for Retaliation; PREA Allegation Status Reporting; Sanctions for Inmates, Staff, Contractors, and Volunteers..

TDOC Index #305.03 notes interaction between employees and offender shall be of a professional nature only and includes definitions of the following: Employee; Offender; Sexual Abuse; Sexual Contact; Sexual Harassment and Sexual Misconduct. The policy notes social relationships between staff and offenders are prohibited including but not limited to emotional, sexual or romantic attachment within an institution, offender on parole or probation, and former offender who has been discharged from TDOC custody or probation/patrol supervision for less than one year. In addition, sexual contact between employee and offender is prohibited and subject to administrative and criminal sanctions. Any staff member convicted of an offense that constitute sexual offense of violent sexual offense will be placed on the Tennessee's sex registry.

DJRC Index #502.06.2-1 notes it is the policy of DJRC to provide a safe, human and appropriately secure environment, free from threat of sexual assault /harassment for all inmates by maintaining a program of prevention, detection, response, investigation and tracking of all alleged and substantiated sexual assault and sexual harassments. All PREA sexual abuse and sexual harassment allegations will be

investigated in a timely, efficient, and confidential manner in accordance with federal guidelines (Title 28 CFR Part 115). DJRC will have zero tolerance for incidences of sexual assault and sexual harassment.

TDOC Index #502.05 also includes the definitions of disciplinary offenses for sanctions of the following: Sexual Battery (Class A); Sexual harassment (Sexual B or C); Sexual Misconduct (Class B or C); Rape (Class A).

115.11(b) Per TDOC Index #502.06, the Commissioner/designee appoints a TDOC Statewide PREA Coordinator within the Office of Inspector General (OIG) who will be responsible for implementing, developing, overseeing, and monitoring the Department's PREA activities, policy development, and training.

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 to the 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. There are ten (10) PREA Compliance Managers throughout the agency's various correctional facilities. The agency recently added the positions of three (3) Regional External Compliance Specialist who aids her in monitoring for compliance with agency policies and the PREA standards. The Regional External Compliance Specialists works under the direction of Director of External Compliance and are required duties that include but are not to conduct regular visits to each facility within their region at a minimum twice per month that includes conducting walks throughout the facility; review PREA related documentations to include monitoring of investigations while ensuring all approximate steps are taken; review the timely completion of risk screenings to include the review of housing of those inmates identified as victims of sexual abuse and those inmates with a prior history of victimization, participate in the review of incident reviews etc. She is abreast of any concerns identified and meetings are held with the affected Warden in which corrective actions are immediately eliminated and monitored.

115.11 (c) Per TDOC Index #502.06, the Facility/Site PREA Coordinator (FPC) appoints an on-site PREA Compliance Manager (PCM) who is responsible for ensuring the facility's compliance with PREA standards. On a monthly basis, PCM informs the FPC of the facility's compliance status using the Inspection Team Worksheet, CR-3821.

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 facility reports and forward to

	each Assistant Commissioner, Deputy Commissioner, Inspector General, Statewide PREA Coordinator, and Director of Decision Support. The DJRC organizational structure plan identifies the DJRC PREA Compliance Manager is also assigned as DJRC Correctional Compliance Manager and reports to the Warden. However, all duties and responsibilities as the PREA Compliance Manager are reported to the Associate Warden of Programs/Facility PREA Coordinator, Per an interview with DJRC PCM, they were recently assigned to perform the duties of the PCM that includes providing assistance to the Associate Warden of Programs/ Facility PREA Coordinator and have been allotted ample time to perform the duties as such. Based on the review of agency policies, organizational charts assignments of the Director of External Compliance/TDOC Statewide PREA Coordinator, appointment of the DJRC PREA Compliance Manager, and interviews, DJRC does meet the mandate of all standard provisions.
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115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-audit Questionnaire (PAQ) 2. TDOC Index #502.06 PREA Implementation, Education and Compliance 3. Contracts for Confinement of Inmates with Core Civic 4. TDOC Agency Website 5. PREA Reports for Contracted Facilities 4. Interview with the following: a. Agency Contract Administrator 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. All contractors housing TDOC offenders must have written policies and procedures providing for orientation and education, which require the approval of the TDOC before implementation.

	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. 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 eradicating any form of sexual abuse within facilities/programs/offices owned, operated, or contracted. Additionally, 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. The auditing team's reviewed of TDOC website at https://www.tn.gov/correction/state-prisons/prison-rape-elimination-act.html noted Final PREA audit reports are available with the National PREA Resource Center. The review of the website https://www.prearesourcecenter.org/audit/directory confirmed the most recent PREA audits for the contract facilities between TDOC and Core Civics were posted dated as the following: Hardeman County Correctional Facility, June 9, 2023; Whiteville Correctional Facility, June 5, 2023; Trousdale Turner Correctional Center, November 16, 2023; South Central Correctional Center July 4, 2025. Based on the review of the agency’s and National PREA Resource Center websites, confirming the completion and submission of the contracting facilities’ PREA reports, and interview with agency contract administrator, the facility is compliant with all standard provisions.
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115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prisons Rape Elimination Act (PREA) (Effective 10/21/2024)

3. DOC Index #506.22 Security Staff Assignments (Effective 03/15/2023)

4. TDOC Index #506.14 Housing Assignment (Effective 09/15/2020)

5. DJRC Annual Staffing Review

6. Monthly SART Reports

7. Security Staff Daily Assignment Rosters

8. Logbooks Documenting Unannounced Rounds.

9. Site Observation

10. Interviews with:

a. Warden

b. DJRC PREA Compliance Manager

c. Intermediate or Higher-Level Supervisors

d. TDOC Statewide PREA Coordinator

115.13 (a) Pursuant to TDOC Index #502.06, Each facility develops a staffing pattern that provides for the adequate levels of staffing and monitoring to protect inmates against sexual abuse. By July 1st of each calendar year, each facility must assess, determine, and document whether adjustments are needed to the facility's staffing plan. This review will follow the guidelines of PREA Standard 115.13 (a), (b), (c) and is completed on the PREA Annual Staffing Review, CR-3964.

The review of the DJRC 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.

Per the PAQ, the average daily number of inmates at DJRC since the last PREA audit was 598. The PAQ also noted that the average daily number of inmates on which the staffing plan was predicated was 598. The inmate count on the first day of the site observation was 622

Per an interview with the DJRC Warden, the facility maintains a staffing that ensures an adequate staffing level to protect inmates against sexual abuse. The current staffing plan was developed prior to his assignment at the facility; however, he has reviewed it and ensures the facility operates in compliance with the staffing plan. An upgrade of the video monitoring equipment and additional cameras have been added since the last PREA audit. The installation of the additional cameras and their locations were based on an effort to enhance security, the protection of inmates from

sexual abuse, recommendation by the SART, and based on the findings of sexual abuse investigations.

Formal and informal interviews with staff and the inmate population indicated neither expressed 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.

Throughout the site observation, the auditing team observed the staffing level to be adequate and prevalent throughout all areas where inmates were authorized in addition to being supervised by security and/or non-security staff during the various shifts. However, the following recommendations were made by the auditing team in an effort to enhance staff observation of the areas: 1) Installation of a mirror in the warehouse; 2) Reorganization of the storage area in the outside warehouse; 3) Installation of two (2) mirrors in food service; 4) Replacement of all shower curtains at the Transition Center to allow viewing of the occupants' head and feet. Completion of all recommendation was confirmed through the submission of photographs during the post audit phase.

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

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 or 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.

The PAQ noted the most common reason for deviating from the staffing plan in the past 12 months as staff shortages, staff sickness, and unexpected staff leave. However, per interviews with the DJRC Major, and Warden, although the facility may experience staff shortages, there are never any circumstances when a post identified as critical is not manned. Overtime is always authorized to ensure proper coverage in all areas where inmates are within those areas such as housing units, medical and mental health, food service, education, recreation etc.

Per in interview with the DJRC Warden, security staff rosters are developed by the Administrative Lieutenant, updated daily by the Shift Commanders and forwarded to the Major, Associate Warden of Operations, a final review and signature is completed by him for assurance that all critical posts are filed. Although the facility currently has 13 security staff vacancies, critical posts are never vacated. Roster adjustments are made from non-critical post and/or the approval of overtime compensation is automatically granted. Certain posts are only identified as critical when inmates are assigned to the area/department such as food service, education, etc., and are identified as such on the daily rosters. Therefore, there are never any occurrences of deviations from the staffing plan.

The auditing team requested a random selection of security daily shift rosters for review for various days and shifts throughout the review period. The review confirmed all post identified as critical were manned throughout the required periods.

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 DJRC Staffing Plan confirmed it was acknowledged as reviewed by the Major, Associate Warden of Security, Facility PREA Coordinator and Warden on July 1, 2025, with a final review signature by the TDOC Statewide PREA Coordinator on July 7, 2025.

Per the DJRC PREA Compliance Manager, they were recently assigned the duties of the facility's PREA Compliance Manager and therefore, was not included in the review of the staffing plan. However, as a member of the SART, they are familiar with the facility's obligation to comply with the staffing plan.

Per the TDOC Statewide PREA Coordinator, each facility develops an annual Staffing Plan in which she is included in the review and is consulted prior to any adjustments to the developed Staffing Plan.

115.13 (d) Pursuant to TDOC Index #502.06, 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 on each shift daily. Each unit/program area logbook is annotated with "Unannounced PREA Inspection/Security Check", when signing into the unit/program area to conduct unannounced rounds.

The policy also includes that on a monthly basis, each FPC and/or PCM ensures that an unannounced PREA-Free Walk is conducted using the PREA Inspection Team Worksheet, CR-3821. This inspection is conducted to identify and deter sexual abuse and sexual harassment. By the 15th of each month, the Warden/Superintendent/designee submits the facility's previous month's PREA-Free Walk documentation to the Assistant Commissioner of Prison Operations/designee. The Assistant Commissioner of Prison Operations/designee compiles all the facilities' reports and forwards them to each Deputy Commissioner, Assistant Commissioner, Inspector General, Statewide PREA Coordinator, and Director of Decision Support: Research and

	Planning for review. Monitoring for PREA is conducted using the appropriate inspection instrument(s) during the annual compliance inspection. The inspection instrument(s) are developed in conjunction with the TDOC Statewide PREA Coordinator to ensure compliance with PREA standards. Documentation of SART team unannounced PREA-Walk monthly meeting minutes were presented for review. The review confirmed PREA-Walks were conducted in various areas/departments throughout the facility while documenting comments to include recommendations and findings. TDOC Index #506.14, states the shift commander/unit manager or designee shall conduct unannounced rounds of inmate living and activity areas at least once during his/her shift for the purpose of detecting deficiencies and possible breaches of security and to identify and deter sexual abuse and sexual harassment of inmates. Members of the unit team, counselors, teachers, and other members of the program staff shall be available upon request. All staff members and official visitors who visit the housing units shall make an entry into the unit log as to the reason for the entry into the unit. Random samples of housing unit logbook entries from housing units at main, Transition Center, programs and operations department areas, during various shifts and weekdays throughout the review period were selected for confirmation of documented Unannounced PREA Inspections. The review confirmed the appropriate rounds were documented daily at various times during each shift in accordance with the standard provision. The Unannounced PREA Inspections were noted as conducted by Sergeants, Shift Commanders, Unit Managers, and higher-level management staff. TDOC Index #502.06 also notes any staff member alerting other staff members that these unannounced rounds are occurring will be subject to appropriate disciplinary action. Interviews with supervisory staff (Sergeants, Lieutenants, Shift Commanders, Unit Manager, and Major) indicated unannounced rounds are not conducted within a pattern that allows staff or inmates to anticipate their arrival. The unannounced rounds are conducted at various times and are often completed several times throughout each shift. Staff identified as alerting others of their prior arrival in any area would receive a coaching session followed by possible disciplinary actions for continued occurrences. Based on the review of agency policies, documented staffing plan that includes the standard provision, supervisory unannounced PREA rounds, security daily rosters that support compliance with the staffing planning, observation of staffing level during the site observation, and interviews with staff and the inmates, DJRC does meet all provisions of the standard.
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Auditor Overall Determination: Meets Standard
Auditor Discussion
Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #506.14.2 Housing, Programming of Youth Inmates (Effective 11/30/2018) 3. Inmate Roster With Date of Birth 4. Site Observation 5. Interview with the following: a. DJRC Associate Warden (Programs)/Facility PREA Coordinator b. DJRC PREA Compliance Manager c. DJRC Warden 115.14 (a) (b) (c) TDOC Index #506.14.2 Housing and Programming of Juvenile Offenders outlines the agency’s policy for housing and programming for youthful offenders. 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. The following facilities are identified for the housing for 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. Females are assigned to the TDOC Debra K. Johnson Rehabilitation Center. The policy further states at no time shall a juvenile offender be involved in activities with adult inmates and any contact with adult inmates shall be no more than incidental (i.e., when it may be necessary to escort juvenile offender to another section of the institution when adult inmates may be in the general yard areas, or in the event of an emergency when juvenile offenders may have to evacuate the housing unit temporarily). In areas outside the housing units, staff shall provide direct supervision when juvenile offenders and adult inmates have sight and sound contact. Per interview with the DJRC Associate Warden (Programs)/Facility PREA Coordinator, DJRC PREA Compliance Manager, and DJRC Warden, although the facility is designated to house juvenile offenders, none have been assigned in an excess of the last PREA audit. The review of an inmate roster that included their birth dates, confirmed inmates under the age of 18 were not assigned.

	Based on agency policy, inmate roster, site observation and interview with staff, the facility has not housed youth under the age of 18 in an excess of the review period. Therefore, DJRC does meet all provisions of standard.
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115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/24) 3.TDOC Index #506.06 Searches Change Notice (08/19/2024) 4. DJRC Index #112.08.1 Personal Hygiene Resources for Inmates (Effective 11/12/ 2025) 5. Employee/Offender Interaction 6. Opposite Gender Announcement Postings 7. Site Observation 8. Interviews with: a. Staff b. Inmates 115.15 (a) Per 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. 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 within 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.

The DJRC 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 areas where visual searches are authorized to be conducted. The identified areas within the intake include the use of a body scanner operated by a female staff only and a designated cell in which a privacy screen is used to ensure privacy. Additionally, areas include individual medical cells pending transport with privacy screens installed, and staff restrooms in housing units where solid doors provide privacy. Opposite -gender supervisors are not required to supervise or observe strip searches.

115.15 (b) (c) 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.

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.

DJRC is designated as a female facility. Male inmates are not assigned.

Interviews with random staff and the inmate population indicated female staff only conduct both pat searches and strip searches of the inmate population (female).

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 none were initiated.

115.15 (d) Pursuant to Index #112.08.1, All inmates are allowed to shower, perform bodily functions and change of clothing without non-medical staff of the opposite gender viewing breast, genitalia or buttock except in emergency circumstances or when such viewing is incidental to routine cell checks.

The auditing team observed the following procedures pursuant to the standard provision. Individual cells in Units 1, 2, and 3 are designed to provide privacy in changing clothes and performing bodily functions without being viewed by non-medical staff. Privacy is provided by individual shower stalls with doors and a small window at the top of the door with covering provided by a shower curtain. Privacy is provided at the Transition Center by shower curtains installed at the individual showers and toilet stalls.

TDOC Index #305.03 notes the following: When staff of the opposite gender enter an inmate housing unit he/she shall announce his/her presence. Each Warden/ Superintendent shall ensure that this language is provided in the applicable post order governing inmate housing, living quarters, etc.

Plaques were observed posted at the entry door of all housing units stating, "OFFICER MUST ANNOUNCE WHEN MALE IS ON THE UNIT." Additionally, the following was

	observed posted in housing units visible to the inmates when male staff are assigned: “Notice to offenders: Male staff are no on shift” and includes a drawing identified as MEN. The practice of male staff announcements was also observed during the site observation. Interviews with staff, and the inmate population confirmed male staff always announce themselves upon entering the housing units. Those interviewed, also acknowledged inmates, are provided privacy during showering, change of clothing and in the performance of bodily functions. Based on the review of agency’s policies, observation during site visit, interviews with staff and inmates, the facility has demonstrated compliance with all the provisions of this standard
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. TDOC Index #404.05 Orientation Unit (Effective 10/30/2018) 4. TDOC Inmate Rules and Regulation Handbook 5. TDOC Index #502.04 Rulebooks forFor Inmates 6. TDOC (DJRC) Title VI-Limited English Proficiency (LEP) Quarterly Reports 7. DJRC Plan for Providing Inmates with Limited English Proficiency Access to Program and Activities (As required by the Civil Rights Act Of 1964) 8. TDOC Index #103.10.1 Title VI – Limited English Proficiency (LEP) (Effective 02/01/2019) 9 TDOC Program Curriculum HR-5-04 Title VI (FY 23-24) 10. “I Speak” Interpretation Services Available 11. Lionbridge ASL and Live Interpreter Service Instructions for Staff 12. Video Relay Interpreting (VRI) Service

13. Tennessee Language Center Institute for Public Service Telephonic Interpretation Services 14. National PREA Resource Center PREA Educational Videos, English, Spanish, Closed Caption and ASL 15. University of TN – TN Language Center Contact 16. Inmates With Hearing Disabilities Posters 17. Issued Inmate Tablets PREA Education English/Spanish/Closed Caption/ASL 18. Site Observation 19. 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. Specifically, 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 individuals 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). 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. 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. Additionally, inmates with a physical or behavioral health issue that prohibits them from understanding the PREA Screening System Application and process is not

screened until the attending physician, or mid-level provider clears them for orientation. The assigned counselor documents the inmate's physical or behavioral health status on Contact Note LCDG in OMS and again when the inmate does receive their screening.

The TDOC Inmate Rules and Regulations Handbook, page 26, notes the mandate of services for inmates with hearing disabilities. To ensure effective communication with inmates who have a hearing disability, the TDOC will provide appropriate auxiliary aids and services free of charge, such as; qualified sign language interpreters and oral transliterators, TTDYs 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 and closed captioning for use in TDOC programs, activities and services. To request auxiliary aids or services, inmates should complete a TDOC inmate Inquiry – Information Request for (CR-3118) and submit to the Chief Counselor.

Notices of the Inmates with Hearing Disabilities posters were observed posted on bulletin boards at both the main site and Transition Center, to include visitation galleries, intake, inmate library, all inmate housing units, program areas, and operational departments that advised the inmates of the available services.

Housing unit 3A is designated as an assistant living program for the housing of inmates with various disabilities to include those who are elderly. In effort to ensure safety of these inmates during emergency situations, the identity of the inmate's disability may be placed on their cell door.

TDOC Index #502.04, notes When a literacy or language problem prevents an inmate from understanding the rulebook, a staff member or translator shall provide individual instructions regarding the contents.

In accordance with TDOC Index #404.05, Offenders who may have difficulty understanding the cognitive orientation program written materials due to a language and/or literacy problem or hearing or visual impairment shall receive personal assistance from a facility staff member or volunteer.

The agency has established a contract with the University of Tennessee Language Center, to provide qualified language interpreter services to inmates who require American Sign Language (ASL) via video. The contract was identified as current through June 30, 2028.

The Tennessee Language Center Video Relay Interpreting services and the Tennessee Language Center Telephonic Interpretation were identified as available to aid in providing translation services to include PREA education to the inmate population as applicable to their disability. The (VRI) system is noted as available to TDOC 24 hours daily that includes instructions for usage. .

Per the Associate Warden of Programs/Facility PREA Coordinator, a laptop with webcam capability is available to staff to provide translation services services to

inmates who are deaf (ASL) and/or LEP.

The auditing team observed the PREA educational video developed by the National PREA Resource available in English, Closed Caption, Spanish and ASL as utilized by staff during the intake process. The PREA video is also available on each inmate's tablet.

Continuous PREA educational material was observed posted on bulletin boards and walls throughout the facility in all housing units, programming areas and operations divisions. The information included various ways to report sexual abuse and sexual harassment on noticeable bright gold paper in both English and Spanish within a font size 18 that is easily accessible to those with low vision.

The auditing team conducted interviews with inmates within the following targeted groups as per the standard provision.

The facility identified 22 inmates as hard of hearing and zero as deaf during the site observation. Three (3) were selected for interview. Each inmate acknowledged their issuing of hearing aids and receiving PREA education in the various methods that included observance of the educational PREA video in English and Closed Caption, receipt of a DJRC Rules and Regulations Handbook, TDOC PREA brochure, TDOC Rules and Regulations Handbook and a PREA discussion by staff during the intake process. All reported they would report PREA allegations verbally to staff or call the PREA Hotline.

The facility identified 25 inmates as low vision and zero as blind during the site observation. Two (2) were interviewed and acknowledged they were previously issued eyewear that allowed them to observe the PREA educational video and review the DJRC Rules and Regulations Handbook with PREA information upon their arrival at DJRC. Additionally, staff presented an overview of PREA information during an oral presentation on ways to report PREA allegations. Each also acknowledged observing PREA information posted in their housing unit and other areas throughout the facility.

Sixteen inmates were identified with a cognitive or functional disability. These inmates are assigned to housing unit 3A, an assistant living program for those with disabilities and elderly individuals. An inmate selected for an interview stated in addition to their observation of the PREA video, receipt of the facility and agency handbooks, and the TDOC PREA brochure during the intake process. A staff member also inquired if they were able to read and understand the information provided to them both orally and written prior to discussing the facility handbook. Staff ensured they were aware of ways to report sexual abuse and sexual harassment.

One hundred and twenty-two inmates were identified with physical disabilities; three (3) were selected for interviews. The selected inmates each observed the educational PREA video during the intake process, received a DJRC Rules and Regulation Handbook, TDOC PREA brochure and received a discussion by staff during the intake process while they were informed of various ways to report PREA allegations. Each also acknowledged the staff member inquired if they were able to read and understand the information provided to them.

The auditing team confirmed PREA education is provided in methods that ensures effective communication with inmates including those identified as cognitive or functional disabilities; hard hearing/deaf; physical disabled; low vision/blind; Limited English Proficient; and limited reading skills. PREA education was observed presented in the various methods to include but not limited to: written material, to include via the inmate's issued tablets, oral presentation by staff, presentation of the PREA video created by the National PREA Resource Center that is available in ASL, Closed Caption, English and Spanish and in addition to PREA information postings in font size 18 for those with low vision and available translation services to include for LEP and ASL services by contracting agencies.

115.16 (b) TDOC Index #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.

Per the Agency Head Designee, there are two (2) state contractual agreements for service in addition to in-house translators are on staff that are able to converse in other languages for inmates identified as Limited English Proficient (LEP).

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.

All institutions and community supervision offices shall ensure that individuals who have a Limited English Proficiency (LEP) have access to programs and activities as required in Title VI of Civil Rights of 1964. Provisions for language assistance for LEP individual shall include but not limited to the following: Notice of available services to LEP offenders and/or visitors at the main entrance to the facility, district office intake visitation galleries, and in the inmate library; Types of Interpretation; Procedures for Requesting and Documenting Interpretation/Translation Services; Grievance Procedures; Education/Programs; Housing; Notifying the Public about Language Services. Types of services provided includes Telephonic interpretation and In-person (Live) Interpretations.

The policy indicates that an assessment during the intake process will determine if the inmate requires language or literacy assistance.

Additionally, during the intake process, offenders requiring language or literacy assistance will be offered Language Identification (I' Speak) Guide to determine if the offender has literacy or language deficiency. Those requiring LEP services will be documented and reported to the LEP Coordinator immediately. An interpreter will be

provided through utilization of institution, volunteers or contract interpreters to determine the extent of their proficiency. Additionally, Unit management staff shall monitor the housing assignments of all LEP inmates and ensure that interpretation services are provided as needed.

TDOC Index #103.10.1, also notes procedures in which interpretation services shall be provided as: 1) Notice of available language services to LEP offenders and/or visitors at the main entrance to the facility, district office, intake, visitation galleries, and in the inmate library. 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, offenders 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 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.

TDOC Index #502.04, notes When a literacy or language problem prevents an inmate from understanding the rulebook, a staff member or translator shall provide individual instructions regarding the contents.

The auditing team observed the “I Speak” Language Identification Guide posted in the intake area that allow inmates to identify their language from the list of languages to include Spanish. Additionally, a list of languages available for telephonic interpretation provided by the Tennessee Language Center Institute for Public Service including an excess of 100 languages were identified as available for use by staff.

The DJRC Plan for Providing Inmates with Limited English Proficiency Access to Programs and Activities documents the facility’s obligation to provide appropriate services to inmate identified as Limited English Proficiency. The plan identifies the duties of staff to obtain interpreters for services provided within various departments/ areas to include but not limited to the following: medical/mental health services, classification assignment and hearing; disciplinary procedures, grievance procedures, education /programs. housing assignment, court appearances, parole hearings, program availability, etc. The office of the Associate Warden of Program is responsible for maintaining a list of all Limited English Proficient inmates. The Plan also includes a list of DJRC staff who are bilingual and provide translation services in the following languages: Spanish, French, and Arabic as needed for the inmate population. The DJRC Plan is revised annually.

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 telephonically for non-native English-speaking inmates.

The facility completes a quarterly report on translation services provided to the inmate population identified as the TDOC Title VI-Limited English Proficiency (LEP)

	Services. Translation services were documented as completed via telephone through the language line and/or in-person by staff. Language translation services were also documented as provided during the intake orientation process. Translation services were noted as provided for the Cambodian and Spanish languages. The facility reported zero inmates identified as Limited English Proficient that required translation services during the site observation for an interview. However, the auditing team observed the “I Speak Card: posted and available for those who are limited English proficiency to identify their language that allows staff to arrange appropriate translation services. The auditing team observed the educational PREA video presented to the inmate population as available in the Spanish language. PREA educational posters and information was observed posted in the Spanish language on bulletin boards and walls throughout the facility in the entrance and all housing units, intake, and all programming and operational division areas on bright yellow flyers in large font. The DJRC Inmate Rules and Regulations Handbooks and TDOC PREA brochures were available for issuing to the inmate population in English and Spanish. 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-responding duties or the investigation of the inmate’s allegation. A contact note, using code LCDG is posted in OMS, identifying the name of the assistant/interpreter and their organization. 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. : Interviews with 16 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 by authorized staff to include the Shift Commander as needed. Based on the review of agency policies, available options to staff in providing PREA education to inmates with disabilities and to include translation services for those identified as LEP such as staff and interagency contract for interpretation, to include language and ASL, site observation, and interviews with staff and inmates, the facility has demonstrated compliance with all the provisions of the standard.
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115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ)

2. TDOC Index #301.04 Job Requirements (Effective 03/15/2023)

3. TDOC Index #118.01 Religious Services (Effective 08/01/2021)

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

5. TDOC PREA Self Declaration Forms

6. TDOC Staff, Contractors, and Volunteers' Criminal History Background Records

7. Interviews with:

a. DJRC Human Resource Administrator

b. Associate Warden of Programs

115.17(a) 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.

TRICOR will be responsible for providing designated TDOC facilities and work locations with a monthly list of current employees who require annual background checks in conjunction with the employee's birth month. Additionally, PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819, shall be completed as part of the annual background check. In no instance shall NCIC/FBI criminal history documentation or results be given to any contract entity.

Construction contractors (contractors hired by the State or subcontractors that work on any TDOC property as part of an approved construction project) will complete a Construction Contractor Pre-Access Questionnaire, CR-3834, sign the TBI Release of

Information, and submit them to the TDOC site manager. The TDOC site manager shall ensure that a photocopy of the contractor's driver's license or other valid current photo identification is attached to the questionnaire. Fingerprints will also be collected at facilities and filed with the questionnaire. Assigned TDOC staff will review relevant data on the OMS as well as the submitted questionnaire in determining if the construction contractor or their employee(s) is allowed access to the site. Additionally, PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819, shall be completed as part of the process.

115.17 (b) Pursuant to TDOC Index #301.04, The Department shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who have contact with inmates. Assigned employees who have substantiated PREA complaints against them for sexual harassment or abuse must acknowledged such each year on the CR-3819 and whenever they apply for advancement.

Per the Human Resource Administrator, the agency does consider incidents of sexual harassment when determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

115.17 (c) (d) (e) Per TDOC Index #301.04, After a conditional offer of employment is made, a National Crime Information Center (NCIC) criminal history check shall be 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.

Staff of privately managed facilities (excluding TDOC staff working at these facilities) and staff of any non-construction contract vendors working at any TDOC facility will be fingerprinted by the vendor contracted by the TBI for such services.

The PAQ noted, in the past 12 months, the number of persons hired who may have contact with inmates who have had criminal background records was 54. Additionally, the PAQ noted in the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmate as eight (8). These contracts were identified for services provided within the medical, mental health, food service departments and services for inmate's tablets/phones. Per the Human Resource Administrator, although the contractors are employed through their respective agency, the DJRC Tech Room conduct background checks and human resource contracts their agency when the applicant's background check is cleared, and a final review for consideration of employment is completed by the Warden.

TDOC Index #301.04 further states current employees will be required to submit to an annual background check. The check is to be completed by the end of the month during which the employee's birth date occurs. The Human Resources Offices of each TDOC work location will be responsible for compiling a monthly list of employees who

have birthdays each month. Once the list is developed, the information is to be forwarded to the appropriate NCIC operator at TDOC facilities and work locations by the 25th of the month preceding the birth month in which the checks are to be completed.

Self-Declaration of PREA Sexual Abuse/Sexual Harassment, CR-1389, shall be completed as part of the annual background check.

Criminal history inquiries through NCIC for prospective and current employees will be processed at designated TDOC facilities. DJRC is designated to conduct criminal history inquiries for DJRC and other TDOC facilities.

TDOC Index #118.01 states the chaplain or another staff member designated by the Warden/Superintendent shall submit a NCIC Criminal History Request, CR-3552, within ten working days of receipt of the application for all persons seeking to be approved as new outside clergy. Results of the criminal history report shall be provided to the appropriate staff in accordance with Policy #301.04. If the report discloses evidence of previously undisclosed offenses, the Warden/Superintendent shall take appropriate action in the same manner as provided in Policy #115.01.

TDOC Index #115.01 states to be considered for a position, any prospective volunteer must complete an online Volunteer Services Application at <https://apps.tn.gov/vserv-app/institution> to facilitate the processing for NCIC background check. No volunteer shall be approved with a conviction prohibited by PREA regulations. The VSC/CSVSC or chaplain shall submit an NCIC Criminal History Request, CR-3552, on all prospective volunteers, and outside clergy who wish to become volunteers, within five working days of receipt of the Volunteer Services Application. The CR-3552 is automatically generated via the volunteer database once an application is submitted and forwarded to BI-VMS@tn.gov. A designated NCIC operator will complete the background check and provide a disposition summary and forward it to the Director of Religious and Volunteer Services/designee within three business days. The Director of Religious and Volunteer Services/designee shall then forward the disposition summary to the approving authority/designee within three business days. Within five business days, the approving authority shall return it to the Director of Religious Volunteer Services.

Per an interview with the DJRC Associate Warden of Programs, volunteers' backgrounds checks are completed by the TDOC Central Office and forwarded to the Warden for final approval. In addition to the completion of a cleared background check, the volunteers are required to complete the PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819. Background checks are completed annually in addition to the completion of the PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819.

The auditing team confirmed the completion of NCIC criminal history checks for the following: six (6) new hires; 17 volunteers, 14 contractors; nine (9) annual background checks throughout the 12-month review period with no discrepancies noted.

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) Have you ever engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution? b) Have you ever 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, contract 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. They 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.

Per the Human Resource Administrator, applicants are required to complete the PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 with their application which is required before the agency submit the background checks. 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 the completion of their annual background check which 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 in July during their annual background check. All applicants seeking promotions are required to submit a new PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819, prior to the conducting the interview.

Per an interview with a staff member who was selected for promotion, they were required to submit a new PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819 form prior to the interview process.

The auditing team confirmed the submission of completed PREA Self Declaration for Sexual Abuse /Sexual Harassment, CR-3819, through the review of the personnel files for the following individuals: six (6) new hires; 17 volunteers; 14 contractors; nine (9) annual background checks and four (4) promoted staff throughout the 12-month review period with no discrepancies noted.

	115.17 (g) Pursuant to TDOC Index #301.04, 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 at a later.” This information was also identified as provided to all applicants within the pre-employment packet. Per the Human Resource Administrator, 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 as described in the agency policy. Additionally, policy requires staff to report all involvement with law enforcement to include sexual allegations to Warden within 24 hours, however normally staff report immediately or as soon as possible. 115.17 (h) TDOC Index #301.04 states Consistent with Federal, State, and local law, the TDOC will 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. This information shall be documented in the PREA Questionnaire for Prior Institutional Employers, CR-3962. Additionally, unless allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for when such employee has applied to work. The Human Resource Administrator confirmed the agency does provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from the requesting agency signed by the former employee authorizing release of the information. Based on the review of various new hire and annual background checks for TDOC staff, contractors, and volunteers in addition to the submission of PREA Self-Declaration of Sexual Abuse/Sexual Harassment, CR-3819, that is a section of the new hire application process, annual background checks and request for promotions, DJRC does meet all provisions of the standard.
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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. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ)

2. TDOC Index #108.01 Facility Construction, Renovation, and Physical Plant Maintenance (Effective 04/07/2023)

3. TDOC Index #108.02 Design and Construction of Prison Facilities (Effective 06/01/2021)

4. SART Meeting Minutes

5. Interviews:

a. TDOC Agency Head Designee

b. DJRC Warden

115.18 (a) (b) TDOC Index #108.01, TDOC Index #108.02, and the TDOC Owner Project Requirements for Designer outlines the agency's policies in accordance with the standard provisions.

As noted in the agency policies, the Facility Manager and Maintenance Director shall ensure that whenever the Department is designing or inquiring about any new facility, it considers the effect of the design, acquisition, expansion, or modification upon its ability to protect inmates from sexual abuse.

Additionally, when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider the PREA impact of how such technology may enhance the TDOC's ability to protect inmates and staff from sexual abuse.

Pursuant to the TDOC Owner Project Requirement for Designers, The Designer shall provide as a part of the Design Development Phase (DDP) submission documentation that the design team has reviewed the facility design and/or renovation modifications with regards to PREA related issues with TDOC. TDOC identified issues are to be reflected in DDP and subsequent phase documents. Meeting minutes should reflect blind space issues, camera locations, and updating of existing monitoring system to assist in PREA compliance requirements.

Per interview with the Agency Head/Designee, all modifications require a request and approval. Any request submitted must also account for any additional cameras or mirrors that it will be necessary to add to the area to ensure sexual safety. Additionally, 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.

Per an interview with the DJRC Warden, the facility has not initiated and/or completed any substantial modifications since the last PREA audit. However, the facility has received an upgrade of the video monitoring equipment in addition to better quality cameras that serve as an enhancement in the protection of inmates from sexual

	abuse. Additionally, cameras have been installed in various areas throughout the facility based on recommendations submitted by the SART due to investigative findings, incident reviews, and observation during the monthly walk-throughs. Documentation of SART meeting minutes that included recommendations for additional camera installation were submitted for review. Based on the review of agency policies, SART meeting minutes and site observation, DJRC does meet the provisions of the standard.
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115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) 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 Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 5. TDOC Index #113.51 Inmate Co-Payment for Health Services (Effective 10/15/2022) 6. TDOC Index #107.01 Office of Investigations and Conduct (OIC) Roles and Responsibilities (Effective 05/09/2024) 7. TDOC Office of Investigations and Compliance Operational Protocol #008 8. MOU with The Sexual Assault Center 9. Appointment of DJRC Victim Advocates 10. DJRC Offender Handbook 11. PREA Investigative Casefiles 12. Interviews with: a. Random Staff b. Inmates Who Reported Sexual Abuse

- c. DJRC Facility Victim Advocate
- d. Sexual Assault Center PREA Coordinator/Advocate
- e. Nashville General Hospital Medical Practitioner
- f. DJRC PREA Compliance Manager
- g. Program Volunteers

115.21 (a) TDOC Index #107.01 notes the Office of Investigation and Conduct (OIC) as the Investigative Unit (IU) authorized to conduct both administrative and criminal investigations. The policy identifies an administrative case is any case which involves TDOC employees, employees of privately managed institutions, and contract employees alleged to have violated a TDOC or Tennessee Department of Human Resources (TDOHR) policy or protocol. A criminal investigation is any case which involves a subject who is alleged to have committed a violation of the Tennessee Code, Annotated Criminal Code or a federal criminal law or statute.

The Office of Investigations and Conduct (OIC) ensures that all investigations of alleged criminal and/or employee misconduct at any TDOC facility, privately managed facility, TDOC Community Supervision office, or location under TDOC control are conducted.

Additionally, the Director of OIC has authority to initiate investigations and matters of "automatic jurisdiction". Automatic jurisdiction is a term used to denote incidents or allegations which may call for an immediate OIC response, or for automatic investigative action. Commissioner authorizations for incidents and or allegations of this nature are both implied and understood without written authorization. Once initiated, prompt notification will be made to the commissioner by the director of OIC. Automatic jurisdiction is maintained in the following incidents or allegations: (a) Rape or Prison Rape Elimination Act (PREA) related allegations.

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.

Per TDOC Index #502.06, The facility coordinates actions taken in response to an incident of alleged sexual abuse or harassment amongst staff responders (s) and Sexual Abuse Response Team (SART), which include medical and behavioral health practitioners, institutional investigators (s), and facility leadership.

SART Investigations are conducted within 72 hours of receiving the allegation. 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.

The agency developed the Office of Investigations and Compliance Operational Protocol #008, for the purpose of establishing internal standards for the OIC Investigations Unit response to allegations of sexual abuse occurring in TDOC institutions, involving staff and/or inmates. The TDOC Operational Protocol #008, includes the following: (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 April 2013 or most current version. (2) 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 of the appropriate District Attorney for review, adoption and prosecution of any suspects. A National Protocol for Sexual Assault Medical Forensic Examinations Adult/Adolescents dated September 2024 was identified as utilized by the agency and facility in response to sexual assault. \

Interviews with 16 randomly selected security and non-security staff indicated all were knowledgeable of obtaining usable physical evidence upon an inmate reporting an incident of sexual abuse. Specifically, staff stated the required duties of a first responder as outlined in the agency's policy and immediate notification to the Shift Commander. All staff to include security, non-security, contractors, and volunteers, 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(b) TDOC Office of Investigations and Compliance Operational Protocol #008, was adapted from the most recent edition of the DOJ Office on Violence Against Women Publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents" dated September 2024.

115.21 (c) TDOC Index #502.06 indicates upon receiving a report of an alleged sexual abuse within the 72-hours' time, SART members determine if a SANE/SAFE response is required. If the services of an outside medical facility are determined to be required, the victim is transported by security to an outside medical facility with

SANE/SAFE personnel for a forensic examination at no cost to the victim.

If SANE/SAFE personnel cannot be made available, the forensic examination can be performed by other qualified medical practitioners. The medical member of the SART documents the efforts to provide SANE/SAFE services in the inmate's medical chart.

The PAQ noted the number of forensic medical exams conducted during the past 12 months and the number of exams performed by SANES/SAFEs during the past 12 months was zero in addition to identifying zero was performed by SANES/SAFE and zero performed by a qualified medical practitioner.

Interviews with the DJRC medical staff and mental health staff confirmed the facility is scheduled to utilize Nashville General Hospital in Nashville, TN. for forensic examinations.

Per an interview with the Nashville General Hospital Medical Practitioner, one SANE provides services for numerous hospitals throughout the state. However, a legal medical team of qualified medical practitioners has been established and are available to conduct forensic medical examinations as needed.

The auditing teams' review of the sexual abuse investigative case files confirmed zero allegations of sexual abuse included sexual penetration and/or acts that met the standards for a forensic medical examination.

TDOC Index #113.15 notes non-chargeable services to the inmate population includes but is not limited to sexual assault examination, including mental health services necessary to treat the offender.

115.21 (d) (e) Pursuant to TDOC Index #502.06, 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.

Per an interview with the DJRC PREA Compliance Manager, the Sexual Assault Center is an established crisis center who meets all the qualifications per the standards that are identified within the MOU that are available to the inmate population in person and/or via phone. The available services were confirmed during an interview with the Sexual Assault Center PREA Coordinator/Advocate.

TDOC established a Memorandum of Understanding (MOU) with The Sexual Assault Center on January 16, 2014, that remains in effect. The MOU notes the agreement of the following: (1) Maintain confidentiality of survivors of sexual violence who are incarcerated at Middle Tennessee TDOC institutions. (2) Maintain available crisis counseling through organization's crisis hotline at any time and/or 24-hours a day. (3) Work with designated Middle Tennessee Institutions officials to obtain security clearance and follow all institutions guidelines for safety and security. (4) Maintain confidentiality as outline in the Sexual Assault Center informed consent form.

The DJRC Offender Handbook page 29, notes the following: Contact Information for reporting: the Sexual Assault Center at 101 French Landing Nashville, Tennessee 37228 Telephone: (615) 259-9055/Tip Line Dial *9555. Calls to the Sexual Assault

Center are confidential and will not be recorded. The Sexual Assault Center provides victim advocacy service. The Facility PREA Tip Line Dial *9222.

An interview with the Sexual Assault Center PREA Coordinator/ Day Time Advocate confirmed victim advocacy services are available 24/7 to include on holidays. Upon an inmate reporting to the hospital for a forensic medical examination, the attending SANE make notification to the Sexual Assault Center requesting a victim advocate to accompany the victim during the forensic examination for confidential emotional support. In addition to providing advocacy services during the forensic medical examination, follow-up services are available both in person and at the victim's designated correctional facility and/or via telephone at the victims' request. Victim advocacy services are available both in-person and telephonically.

A memorandum drafted by Associate Warden of Programs identifies two (2) licensed mental health practitioners and a counselor who serves as the facility's victim advocates. The notice was observed posted on bulletin boards accessible for viewing by staff to include contractors and volunteers and the inmate population throughout the facility in all housing units, programming and operational areas to include the facility's entrance and visitation area on bright yellow paper in size 18 font.

Per an interview with a License Professional Counselor who serve as the lead facility's victim advocate, they provide individual therapy to the inmate population to include those who are victims of sexual abuse. They are very visible throughout the compound while being accessible to the inmate population in which all are aware of her official position to include as a victim advocate. She also maintains an extensive level of interaction with the inmates that gives them a comfort zone, In addition to emotional support services offered to the inmate population by the mental health staff to include victim advocates, the following in-person emotional support group services are also available to the inmates at the facility to include: Shelter from the Storm, House of Healing, and the Sexual Assault Center, Human Trafficking, Prison Outreach, in addition to others.

An interview was also conducted with a License Professional Counselor with the Prison Outreach Organization that provides group therapy for sexual abuse survivors. The group sessions are held weekly and are run during a 12 -month curriculum. The program also has a medial accompaniment program that consists of volunteers who receive abuse training to serve as victim advocates as needed and would report to the hospital upon request.

An interview was conducted with a volunteer with the Domestic Violence Recovery Class/Trama Seminars. The program is offered at DJRC by License Therapeutic Counselors and is available to the inmates upon request for enrollment for an eight-week course. The course is offered three to four times per year and has been offered for an excess of 13 years.

Additionally, the DJRC also has a program for victims of sexual abuse that is facilitated by a volunteer titled "Shelter from the Storm." Inmates who have experienced domestic violence and sexual abuse are eligible to enroll in the 12-week course. The class is held one day weekly for 2 ½ hours in which 8 -10 inmate victims

	are enrolled. Per the volunteer, inmates will often enroll in the course but may withdraw after numerous sessions while stating they are not ready to address their issues. The program has been effective at DJRC for 20 years. Interviews were conducted with three (3) inmates who reported sexual abuse. Each stated they did not request services of a victim advocate and neither did they experience any form of sexual penetration. However, each acknowledged they are assigned to the mental health caseload and attend regular scheduled meetings with a mental health practitioner whom also serves as a facility victim advocate. 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. 115.21 (h) A memorandum drafted by DJRC Associate Warden of Programs identifies two (2) Licensed Mental Health Practitioners and a Counselor who serves as DJRC victim advocates. The notice was observed posted on bulletin boards accessible for viewing by staff and the inmate population. Confirmation of the counselor's completion of "Meeting the Needs of Prison Rape Victims, A Technical Assistance Guide for Sexual Assault Counselors and Advocates" was presented for review. Based on the review of agency policies, TDOC authority to conduct both administrative and criminal investigations, Office of Investigations and Compliance Operational Protocol #008, PREA Investigative Casefiles and medical documentation, established MOU between the TDOC and the Sexual Assault Center, appointment of facility victim advocates, available services provided by agency licensed mental health practitioners, volunteer organizations, and interviews the facility does meet all provisions of the standard.
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. TDOC Index #107.01 Office of Investigations and Conduct (OIC) Roles and Responsibilities (Effective date 05/09/2024) 4. TDOC Index #305.03 Employee/Offender Interaction (Effective 05/15/2020) 5. PREA Allegation System (PAS) List

6. TDOC Agency's Website

7. Interviews with:

a. DJRC Institutional Investigator

b. OIC Special Agent

b. Agency Head Designee

115.22 (a) (b)) Per the Agency Head/Designee, the agency does ensure that an administrative or criminal investigations are completed for all allegations of sexual abuse or sexual harassment. Agency policies mandate 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. If 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 way 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 the 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.

TDOC Index #107.01, identifies an administrative case as any case which involves TDOC employees, employees of privately managed institutions, and contract employees alleged to have violated a TDOC or Tennessee Department of Human Resources (TDOHR) policy or protocol. A criminal investigation is any case which involves a subject who is alleged to have committed a violation of the Tennessee Code Annotated Criminal Code or a federal criminal law or statute. The policy also notes the responsibility of conducting all administrative and criminal investigation is assigned to the Tennessee Department of Correction Office of Investigation and Conduct (OIC). The OIC is overseen by the Director of OIC and performs both administrative and criminal investigation and prepares IU investigative reports for review by the Director.

Additionally, per TDOC Index #107.01, the Director of OIC has authority to initiate investigation and matters of "automatic jurisdiction." Automatic jurisdiction is a term used to denote incidents or allegations which may call for an immediate OIC response, or for automatic investigative action. Commissioner authorizations for incidents and or allegations of this nature are both implied and understood without written authorization. Once initiated, prompt notification will be made to the commissioner by the director of OIC. Automatic jurisdiction is maintained in the following incidents or allegations: (a) Rape or Prison Rape Elimination Act (PREA) related allegations.

TDOC Index #305.03 states allegations of employee sexual misconduct, sexual harassment, sexual contact and/or sexual abuse shall be investigated in accordance

with TDOC policies and Tennessee statutes. If the accusations are found meritorious, then the employee(s) shall be subject to disciplinary actions, up to and including termination, or appropriate actions where necessary, in accordance with Tennessee statute and TDOC policies. Consent on the part of an offender is not a defense on the part of the employee as a response to charges of any form of sexual misconduct.

Pursuant to TDOC Index #502.06, SART Investigations are conducted within 72 hours of receiving the allegation. 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.

A review of the agency's website <https://www.tn.gov/correction/state-prisons/prison-rape-elimination-act.html> noted the agency's response to sexual assault and sexual misconduct allegations and commitment to conducting investigations of sexual assault and sexual misconduct.

Per interviews with the DJRC Facility Investigator and the OIC Special Agent, all allegations of sexual abuse and/or sexual harassment that could potentially result in a criminal finding are immediately referred to an OIC Special Agent for the completion of a criminal investigation.

The PAQ noted in the past 12 months, the number of allegations resulting in an administrative investigation was 34. However, this number was later identified correctly as 21 as the number 34, exceeded the review period. Zero allegations were referred for a criminal investigation. PREA relations investigations are recorded and maintained in the PREA Allegation System (PAS) by the authorized investigators.

115.22 (c) (d) (e) TDOC Index #107.01 describe 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.

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.

TDOC is responsible for conducting all sexual abuse and sexual harassment investigations, therefore provisions c, d, and e, are not applicable.

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.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/ 2024) 3 TDOC Index #110.01 New Employee Orientation and Pre-Service (Basic) Training (Effective 07/21/2024) 4. Tennessee Correctional Academy Program Curriculum/ PREA (Prison Rape Elimination Act) FY 24-25 and FY 25/26 5. TDOC PREA Training Via PowerPoint 6. TDOC Index #110.05 In-Service Training (Effective 04/01/2021) 7. TDOC Index # 506.14.2 Housing and Programming for Juvenile Offenders (Effective 11/30/2018) 8. DOC New Hire PREA Training Records 9. TDOC Staff In-Service Training Records 10. Site Observation 11. Interviews with: a. Random and Specialized Staff 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 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 online course. Part-time employees, volunteers, contract staff, and employees who are permanently (not temporarily, to cover staff shortages) transferring from one location to another shall receive a minimum of 20 hours of work site orientation appropriate to their assignments. PREA (TDOC-curriculum or NIC online course) is a topic that must be covered in addition to work site/duties training. Re-Hired Employees in the CO Series note the following: All rehired TDOC employees who originally completed their pre-service training program and who have been separated from TDOC for less than two years, including those who were away on active military service for more than 12 months but less than 24 months, shall attend

an abbreviated version of pre-service training. Employees who are away on active military service are not considered to be separated from TDOC service and typically can return from a 12-month deployment without any further training to the duties they performed before they left. If there has been a new duty or responsibility added to their job series while they were away, they must receive that training. (a) Rehired employees in the CO series who have been separated for more than two years, and less than three years are also eligible for an abbreviated version subject to the Warden/Superintendent written approval. Factors such as prior length of service and past work history including disciplinary actions during TDOC service; reasons for separation; other employment during separation shall be considered. Such written approval shall be maintained in the employees' training file. (b) This abbreviated training shall consist of On-The-Job (OJT) and the following classes, plus any other training the Warden/Superintendent deems necessary for 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 responses 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 course utilized for Pre-Service and/ In-Service (annual training course) and exceeds the 10 topics specified in this provision. Agency staff receive comprehensive PREA-related training while attending the Tennessee Correctional Academy (TCA) prior to reporting to their assigned TDOC facility. New hires, including agency staff, and contractors receive PREA training during New Hire Orientation during the first week of employment at the facility prior to contact with inmates.

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

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 16 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. Staff also acknowledged their awareness of the PREA posters and bulletins throughout the facility of the agency's zero tolerance towards sexual abuse and ways to report sexual abuse.

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." The TDOC PREA training courses are developed to provide appropriate training for employees assigned to both male and female correctional facilities. The DJRC is designated as a female facility.

Pursuant to TDOC Index #506.14.2 In order to be qualified to work with juvenile offenders, staff receive training that include PREA - refresher training every two years. However, the agency required refresher training annually.

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

115.31(c) TDOC Index #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).

TDOC Index #110.05, outlines the mandatory in-service training is required for all TDOC employees that include Prison Rape Elimination Act (PREA) annually. On an annual basis (by July 1st,) the Academy Superintendent will distribute a listing of all mandatory in-service training to all Warden/Superintendent/Directors/Training Specialist, and other applicable policy receipt.

	The facility provides refresher PREA training for employees annually to include contractors and volunteers. Confirmation of staff completion of yearly refresher training was supported by staff acknowledgement on the TDOC Employee PREA Training Acknowledgment Form for in-service training and electronically stored data rosters identifying TDOC staff and contractor's PREA training for FY 24/25 and FY 25/26 as the review period included periods of both. The auditing team observed continuous PREA education throughout the facility on bulletin boards and walls accessible to staff to include contractors, volunteers and the inmate population. All staff are issued and carry PREA education refresher cards titled "DJRC PREA Refresher Card" that includes PREA Refresher information of Staff Duty to Report Knowledge, Suspicion, or Information; Ways Staff Can Report; Immediate Action Steps, and Internal/External PREA Reporting Options." Additionally, refresher PREA educational information is continuously displayed on a monitor noticeable to all traffic at the main site entry point. Per interviews with security supervisors and security staff, discussions of PREA related educational discussions are often held during the security shift briefings. 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. Confirmation of completed PREA training was provided for the randomly selected 32 TDOC employees via their signature on the Employee PREA Training Acknowledgement CR-3965 form. Staff acknowledged their receipt of the training in addition to their understanding of the training. 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 DJRC Training Specialist. Documentation of the electronically stored data noted as PREA training for staff to include contractors for FY 24/25 and FY 25/26 was provided for review. Staff are required to successfully complete the test at the end of the course for recognition of completion that confirms their understanding of training. Based on the review of agency's policies, training lesson plans, staff PREA training records, interviews and analysis, the facility has demonstrated compliance of standard provisions
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence Reviewed (documents, interviews, site review):

1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ)

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

3. TDOC Index #110.01 Pre-Service (Basic) Training and Employee Orientation (Effective 07/21/2023)

4. TDOC Index #110.05 In-Service Training (Effective 04/01/2021)

5. TDOC Index #115.01 Standards for Volunteers and Coordination of Community Involvement (Effective 02/15/23)

6. Tennessee Correctional Academy Program Curriculum/ PREA (Prison Rape Elimination Act) FY 24/25 and FY 25/26

7. TDOC PREA Training Via PowerPoint

8. PREA Refresher Action Cards

9. PREA Informational Posters

10. TDOC Website

11. Contractors and Volunteers PREA Training Records and Rosters

12. Site Observation

13. Interviews with:

a. Contractors

b. Program Volunteers

c. Associate Warden of Programs

115.32 (a) (b) (c) TDOC Index #502.06, outlines 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.

TDOC Index #110.01 states part-time employees, volunteers, contract staff and other transferring employees NEO; part-time employees, volunteers, contract staff and employees 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.

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.

The TDOC Prison Rape Elimination Act (PREA) training course presented by the Tennessee Correction Academy is provided in a PowerPoint presentation that is utilized in conjunction with the instructor's use of the TDOC Program Curriculum. The PowerPoint presentation requires staff to complete it electronically during on-line course presentation.

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.

TDOC Index #110.05, outlines the mandatory in-service training is required for all TDOC employees that include Prison Rape Elimination Act (PREA (2 hours)

The facility provides refresher PREA training for employees annually to include contractors. Additionally, PREA education is located on bulletin boards and walls and throughout the institution visible to staff, inmates, volunteers and contractors. All staff are issued PREA refresher cards that are required to be in their possession as continuous refresher training. Documentation of refresher training was submitted through staff acknowledgement on the TDOC Employee PREA Training Acknowledgment Form for in-service training and are electronically stored data roster identifying TDOC staff and contractor's PREA training for FY 24/25 and FY25/26.

The auditing team observed continuous PREA education throughout the facility on bulletin boards and walls accessible to staff to include contractors, volunteers and the inmate population. All staff are issued and carry PREA education refresher cards titled "PREA Refresher Card" that includes PREA Refresher information of Staff Duty to Report Knowledge, Suspicion, or Information; Ways Staff Can Report; Immediate Action Steps, and Internal/External PREA Reporting Options."

Pursuant to TDOC Index #115.01, Orientation and training for volunteers is mandatory. Active volunteers shall be recertified at the end of their first year of service as a volunteer. Orientation and recertification shall be conducted by the VSC/ CSVSC or appointed designee.

For individuals to be considered for a position, any prospective volunteer must complete an online Volunteer Services Application. The review of <https://www.tn.gov/correction/agency-services/volunteer-ppportunities.html>, Volunteer Opportunities confirmed the requirement of PREA training as noted on page 11 of the TDOC Volunteer Services Training Manual.

Per the Associate Warden of Programs, individuals requesting to serve as a volunteer, are required to attend a three-hour training course that includes PREA training. The training course is presented by Central Office staff through a TEAM presentation. The courses are offered numerous times weekly each month and are available to the volunteers for completion of new volunteer training and annual training. Upon completion of the training courses, the volunteers document their signature electronically and the paperwork is forwarded to the facility for placement in each volunteer's file.

Per the PAQ, the number of volunteers and contractors, who may have contact with inmates, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response as 271 identified as 121 contractors and 150 volunteers.

The auditing team conducted interviews with six (6) contractors that included medical

	and mental health, and food service (Armark). Each indicated they received PREA training during the new hire orientation and annually. All were 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. Two (2) program 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. Confirmation of annual PREA training for contractors is maintained electronically upon completion of the on-line course by the facility's training specialist. Documentation of completed PREA training via signature was provided for 15 contractors and 15 volunteers. Electronically stored rosters indicating confirmation of PREA training for contractors were also provided for review. Staff are required to successfully complete the training course for confirmation of completion Additionally, volunteers also signed a TDOC Volunteer Confidentiality and Policy Agreement Training Certification (CR-2935) acknowledging they have received and understood the training which directly affects their work as a volunteer and to abide by these and all other TDOC policies during their tenure of services as a volunteer for the TDOC. The policy training included but was not limited to TDOC Index #502.06 Prison Rape Elimination Action Implementation and Compliance and TDOC Index #502.06.2 Prison Rape Elimination Action Allegations, Investigations, and Sexual Abuse Response Teams. The training is provided by Central Office via TEAMS and is electronically signed upon completion by the volunteers. Confirmation of additional completed PREA training was supported by the volunteer's signature on the identified rosters for "Orientation and PREA Review" on a CR-2245 form. The training is presented by the facility's Chaplain. Specifically, the form notes "Each employee or volunteer, by signing this roster, acknowledges that they understand the course subject matter." 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
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence Reviewed (documents, interviews, site review) :

1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ)
 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024)
 3. TDOC Index #404.05 Orientation Unit (Effective 11/30/2018)
 4. Division of Prisons Classification Users' Guide (Effective 04/2019)
 5. TDOC Index #103.10.1 Title VI – Limited English Proficiency (LEP) (Effective 02/01/2019)
 6. DJRC Offender Handbook (English and Spanish)
 7. DJRC Visitation Handbook (Effective 2026 -2027)
 8. TDOC Index #502.04 Rulebooks For Inmates (Effective 08/01/2018)
 9. TDOC Inmate Rules and Regulations Handbook (Effective 08/2023)
 10. Comprehensive PREA Educational Videos (Spanish/English /Closed Caption/ASL)
 11. PREA Informational Postings and Brochure (English and Spanish)
 12. TDOC PREA Educational Brochures in English and Spanish
 13. Interagency Agreement For Translation Services
 14. DJRC Plan for Providing Inmates with Limited English Proficiency Access to Program and Activities
 15. Inmate Issued Tablets
 16. "I Speak" Language Identification Guide
 17. Inmate TDOC Orientation Acknowledgement Forms
 18. Site Observation
 19. Interviews with:
 - a. Intake Staff
 - b. Intake Counselor
 - b. Inmate Population
- 115.33 (a) (b) (c) Pursuant to TDOC Index #502.06, 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 Division of Prisons Classification Users' Guide outlines the TDOC policy and ACA standard mandate that each offender participates in a thorough orientation program within three (3) days of receipt into the correctional system, a new facility, annex, program, or specialized unit that has unique rules and procedures.

An offender who is permanently transferred to another institution shall complete the institution orientation within three (3) of arrival, as shall an offender at an annex or other specific unit, which has significantly different rules and procedures.

A copy of the TDOC Offender Rules and Regulations Handbook is issued to each offender. The orientation program shall include but not be limited to an explanation of the Prisoner Rape Elimination Act (PREA) and a discussion of the Sexual Assault Pamphlet. Out of necessity, the initial orientation must be rather general and board based. A copy of the TDOC Offender Rules and Regulations is issued to each offender.

Pursuant to TDOC #502.04 the information in the TDOC rulebook shall be broad and comprehensive in nature and applicable to all inmates. The rulebook shall contain but not be limited to the PREA Rape Elimination Act (PREA) inmate/staff misconduct.

TDOC Index #404-05 outlines the requirement for the institutional classification committee to complete orientation of all new admissions and nonexempt offenders, offenders returning to TDOC from a temporary absence of 90 days , offenders stepping down from any form of segregated custody (excluding punitive segregation), or protective custody shall include providing the offender with a copy of the TDOC and /or institutional Inmate Rules and Regulation Handbook in an appropriate language during the health screening process as well as a copy of their visitation handbook within 24 hours of arrival. All staff who conduct offender orientation shall document on OMS contact LCDC, using contact code ORCC that the orientation and the 2003 Prison Rape Elimination Act (PREA) Information have been given to the offender.

Per the PAQ, the number of inmates admitted during the past 12 months who were given PREA education at intake was 1321. This number includes those for temporary hold from their assigned TDOC facility for medical services and/or court appearances.

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 990.

Per the PAQ, zero inmates were noted as not educated within 30 days of their arrival

Per an interview with intake staff, upon the arrival of incoming inmates, each receive an orientation packet that includes the following: DJRC Offender Hndbook, TDOC Inmate Rules and Regulations Handbook, DJRC Visitation Handbook, and the TDOC PREA brochure in which educational PREA information is included each. The inmates are also required to observe the educational PREA video developed by the National

PREA Resource Center. Additionally, a discussion on the agency/facility zero tolerance on sexual abuse and sexual harassment is presented by the intake staff. The PREA videos are available in the following; PREA Adult Comprehensive ASL, PREA Adult Comprehensive Closed-Captioned English, and PREA Adult Comprehensive Closed-Captioned Spanish during the initial intake process. Inmates are given the opportunity to participate in the discussion and ask any questions they may have. Those inmates designated to the facility are also issued tablets to retain in their possession that includes PREA education.

Intake staff also indicated inmates who arrive pending transit (temporary hold) for medical, mental health services and/or court appearances generally depart the facility within three weeks of their arrival. These inmates are placed in single cell assignments and do not interact with other inmates. Upon their arrival at DJRC, they are required to observe the education PREA video developed by the National PREA Resource Center that is presented English, Spanish Closed Caption and ASL. Inmates' temporary housed for transit purposes are issued a copy of the TDOC PREA pamphlet in addition to an oral discussion of the agency's and DJRC's zero tolerance and various ways to report sexual abuse and sexual harassment allegations. However, if at any time an inmate's status is changed from transit to designation at DJRC and /or their temporary status has been scheduled for 30 days or more, the inmate would be re-screened and complete the orientation process that includes additional PREA training.

The TDOC Rules and Regulations Handbook page 7 includes the following: agency's zero tolerance for incidents of sexual abuse and sexual harassment within the facilities for staff and inmates, definitions of sexual misconduct acts, staff/inmate misconduct, monitoring the conduct and treatment of inmates who reported sexual abuse/sexual harassment and changes that may suggest possible retaliation, internal and external reporting options in addition to available confidential victim advocacy services via the inmate phones.

The DJRC Offender Handbook pages 27- 30, includes Facts Related To Sexual Assault; Internal and external options of reporting sexual abuse and sexual harassment; PREA/ Sexual Assault Awareness; Sexual Assault Avoidance; Reporting Sexual Assault; Aftermath; Circumstances If you are the offender that sexually assaults other offenders; Procedures for the exchange of clothing that would provide privacy.

The DJRC Offender Handbook page 29, also include the following: Contact Information for reporting: the Sexual Assault Center at 101 French Landing Nashville, Tennessee 37228 Telephone: (615) 259-9055/Tip Line Dial *9555. Calls to the Sexual Assault Center are confidential and will not be recorded. The Sexual Assault Center provides victim advocacy service. The Facility PREA Tip Line Dial *9222.

The DJRC Visitation Handbook, page 20 notes: TDOC has a zero tolerance for incidences of inmate/staff misconduct to include sexual abuse and sexual harassment within the facility. Third party reporting options accessible to an inmate's family and friends to report incidents of sexual abuse, sexual assault, sexual misconduct or sexual harassment on behalf of an inmate include the following: Tell any staff

member; Call the TDOC PREA Tip line at (515) 253-8173; Call or write the Sexual Assault Center at (615) 253-9055 located at 101 French Landing Drive Nashville, TN 37228. Additional information is noted as available on the agency website at <https://www.tn.gov.correction/state-prison-rape-elimination-act.html>

The auditing team observed inmates in possession of issued tablets and requested inmates to demonstrate access to the PREA educational material and their accessibility to report sexual abuse and sexual harassment both verbally and through written communication via the tablets. Inmates were able to access PREA information to observe a PREA video presented by the National PREA Resource Center titled PREA: What You Need to Know/Loque necesitas saber with unlimited viewing opportunities. Inmates also demonstrated their ability to make calls and forward emails to those on their visiting list and ability to report sexual abuse and sexual harassment internally @ *9222, and externally to the Sexual Assault Center @ *9555.

PREA related information was also observed as posted on the inmate's tablets by the facility's Associate Warden of Programs/Facility PREA Coordinator in which the inmates are required to acknowledge.

The auditing team conducted interviews with 31 inmates including random and targeted for confirmation of receiving PREA education upon their arrival during the intake process. The interviews also included those inmates designated to the facility and those in transit status as a temporary hold. Each inmate acknowledged receiving PREA education during the intake process at DJRC in various methods that included observing the educational PREA video, receiving an institutional handbook, a TDOC PREA brochure and receiving during an oral discussion by staff on various ways to report sexual abuse and sexual harassment to include by reporting to staff or through usage of their tablets or phone to the internal and/or external PREA Hotline numbers located near the phones.

The inmate population acknowledged their observation of continuous PREA education posted in all housing units, programming areas, and operational areas at the main site and Transition Center. The inmates also reference the signage on the walls, and recordings on the phones and tablets that provide the toll-free telephone numbers to report sexual abuse and sexual harassment internally and externally to include available victim advocate services by the Sexual Assault Center. These services were confirmed during testing of the inmate phones in housing units by the auditing team.

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.

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.

Pursuant to TDOC Index #103.10.1 Posters and language identification guides from the contracted vendor shall be posted at each facility and district office, building, entry, intake visitation galleries stating that interpreters are available free of charge to LEP individuals.

Offenders who may have difficulty understanding the cognitive orientation program written materials due to a language and/or literacy problem or hearing or visual impairment shall receive personal assistance from a facility staff member or volunteer.

Additionally, TDOC Index #404.05 notes, New inmates assigned directly to restrictive housing shall receive written orientation material and/or translations in their own language about the institution programs, rules and regulations. When a literacy problem exists, a staff member shall assist the inmate in understanding the material. Orientation should also be used to observe inmate behavior and to identify special problems. Inmates who are unable to read and write or have limited English proficiency shall be assisted in accordance with Policy #103.10.1.

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.

The auditing team observed the "I Speak" Language Identification Guide posted in the intake area that allow inmates to identify their language from a variety of languages to include Spanish and Sign Language. However, English were the only language identified as used by the inmate population during the site observation.

The DJRC Plan for Providing Inmates with Limited English Proficiency Access to Programs and Activities documents the facility's obligation to provide appropriate services to inmates identified as Limited English Proficiency. The Plan includes a list of DJRC staff who are bilingual and provide translation services in various languages to include Spanish, French, and Arabic who are available to provide translation services. The DJRC Plan also includes a list of available translation services within the state of TN for translation services to services for those who are hearing impaired.

In addition to designated staff to provide translation services for inmates identified as limited English Proficiency. The agency has established a contract with the University of Tennessee Language Center, to provide qualified language interpreter services telephonically for non-native English-speaking inmates. Additionally, translation services are to inmates who require American Sign Language (ASL) via video. The contract was identified as effective through June 30, 2028.

The DJRC Inmate Rules and Regulations Handbook pages 27 -30, includes the facility has a zero-tolerance of sexual abuse and sexual harassment and various methods of reporting both internally and externally that include confidential and unmonitored calls. Methods of reporting include the following: Directly to any staff; PREA Hotline telephone *9222; and The Sexual Assault Center at *9555. The information is available in both English and Spanish

The TDOC Rules and Regulations Handbook and the TDOC PREA brochure is also available in English and Spanish that includes the agency's zero tolerance and various ways to report.

Per the intake staff, all inmates to include transit and those designated at the facility are asked if they can read and understand the information provided to them during the delivery of information and prior to documenting their signature on the CR2110 acknowledgment form during the intake process. This procedure was observed by the auditing team.

115.33 (e) Pursuant to TDOC #502.04, When an inmate is issued a copy of the TDOC and/or institutional rulebook, he/she will sign the Orientation Acknowledgement, CR-2110.

The Division of Prisons Classification Users' Guide outlines the Orientation Acknowledgement (CR-2110), documents the offender's participation in the orientation program and includes signatures of the participant, a staff witness, and the offender representative. Refusal by the offender participant to sign shall be noted on the form. If an offender fails to participate in orientation, it shall be noted on the form.

The auditing team randomly selected 34 inmates who arrived during the 12-month review period, for confirmation of their acknowledgement in receiving PREA education at DJRC. The inmates acknowledged receiving orientation upon their arrival at DJRC that included receiving a TDOC Inmate Rules and Regulations Handbook, Institutional Rules and Regulations Handbook, observation of the PREA video during orientation, and receipt of PREA information. Documentation of the inmates' receipt of PREA education is securely maintained in each inmate's personal file within secured file cabinets in the unit management offices accessible to the designated unit management team only.

115.33 (f) Per TDOC Index #502.06 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.

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 free calls in Spanish and English, to via the PREA Hotline *9222. The information is posted on bright gold paper that is easily identified by observers and in addition to size 18 font. Additionally, and The TDOC Zero Tolerance for Sexual Abuse & Sexual Harassment and methods for individuals to report on behalf of an inmate were observed printed on orange flyers within a large font in addition to "NO MEANS NO" posters were observed throughout the facility.

Per TDOC Index #502.04, A copy of each rulebook will be posted in conspicuous and accessible areas in the institution. The Inmate Rules and Regulation Handbook that

	includes PREA educational material was observed accessible to the inmates, staff, contractors, and volunteers in main facility entrance, intake, visitation gallery, inmate library and inmate housing units. Posting of the available confidential crisis counseling to victims while providing methods of reporting via phone and/or in writing to the Sexual Assault Center for third party reporting were posted in both English and Spanish in all housing units and throughout the facility accessible for viewing by the inmate population, staff, contractors and volunteers. The information is posted on bright gold paper that is easily identified by observers and in addition to lettering in size 18 font. Those inmates designated at the facility are issued personal tablets that provide access to continuous PREA information. Inmates demonstrated their knowledge in the use of their personal assigned tablets and accessibility to review PREA education via the PREA video presented by National PREA Resource Center. Additionally, PREA related educational information is posted on the tablets by the DJRC Association Warden of Programs/Facility PREA Coordinator in a memorandum format that is required to be reviewed by the inmate population. The tablets also provide inmates access to report sexual abuse and sexual harassment through free confidential calls via the PREA Hotline at *9222 and/or the Sexual Assault Center at *9555. The information is presented in both English and Spanish. However, inmates held for transit purposes only do not maintain possession of their tablets during temporary housing at DJRC. Based on the review of agency policies, LEP Plan, inmate handbook and rule book, PREA education pamphlets and brochures, in English and Spanish, established contract for interpretation translation, issued inmate tablets, documentation of inmate PREA education, interviews with staff and inmates, and site observation, the facility does meet all provisions of the standard.
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115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #107.01 Office of Investigations and Conduct (OIC) Roles and Responsibilities (Effective 05/9/2024)

3. TDIC PREA Investigation Guide

4. Investigators' Specialized Training Certificates

5. Interviews with:

a. DJRC Institutional Investigator

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

115.34 (a) TDOC Index 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 TDOC PREA Investigation Guide notes the investigators will receive the specialized training in conducting sexual abuse investigations in a confinement setting of all allegations of sexual abuse and sexual harassment.

115.34 (b) An interview with an OIC Special Agent in Charge, OIC Special Agents are authorized to conduct both administrative and criminal investigations. All OIC Special Agents are required to attend a 16-week course at the Law Enforcement Training Academy, Tennessee Bureau of Investigation (TBI). Upon completion of the training, the OIC Special Agents are sworn law enforcement officers with the TDOC Office of Investigations and Conduct and are authorized to conduct all TDOC investigations to include both administrative and criminal cases for prosecution. Additionally, the OIC Special Agents are required to complete the following online courses through the National Institute of Corrections (NIC), "PREA: Investigating Sexual Abuse in a Confinement Setting" and "PREA: Investigating Sexual Abuse in a Confinement Setting: Advance Investigations." OIC Special Investigators are required to complete the NIC course annually. The training does include but is not limited to the following: Techniques for interviewing sexual abuse victims; Proper Use of Miranda and Garrity warnings; Sexual abuse evidence collection in confinement settings; Evidence required to substantiate a case for administrative or prosecution referral.

Per an interview with the DJRC Facility Investigator, the Facility Investigators are authorized to conduct administrative investigations only. The Facility Investigator acknowledged the requirement to complete on-line investigative training courses presented by the National Institute of Corrections, "PREA: Investigating Sexual Abuse in a Confinement Setting,," and "PREA: Your Role in Responding to Sexual Abuse." Training topics noted in the standard provision are included in the training courses.

115.34 (c) Confirmation of the assigned investigators' completion of the required specialized training to conduct sexual abuse investigations in a confinement setting was supported by Certificates of Completion presented by the NIC Academy Division. Specifically, training certifications documented the completion of the following

	courses: PREA: Conducting Sexual Abuse Investigations in a Confinement Setting and PREA: Your Role in Responding to Sexual Abuse, as completed by the DJRC Facility Investigators. Additionally, certificates of investigative training for the OIC Special Agents attendance at the Tennessee Law Enforcement Training Academy and the State of Tennessee Peace Officer Standards and Training Commission to serve as a Law Enforcement Officer for TDOC were presented for the OIC Special Agents. The OIC Special Agents are authorized to conduct both administrative and criminal investigations related to the TDOC. Based on the review of agency policy, documentation of investigators specialized investigative training and interviews, the facility has demonstrated compliance with all the provisions of the standard.
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. Specialized Training PREA Medical and Mental Care Standards 4. Medical and Mental Health Specialized Training Documentation 5. Medical and Mental Health PREA Training Per Standard 115.32 6. Interviews with: a. Behavioral Health Administrator b. Health Services Administrator 115.35 (a) TDOC Index #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 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.

Interviews with both medical and mental health practitioners confirmed that all medical and mental health staff are required to complete the specialized training course upon new hire and annually. Specifically, each employee is required to complete the course upon new hire and annually with their contracting agency (Centurion) that is similar to the Specialized Training PREA Medical and Mental Care Standards presented by the National PREA Resource Center. This training course presented at the Centurion Regional Office is during live instruction. The Specialized Training PREA Medical and Mental Care Standards presented by the National PREA Resource Center is a four hour on-line course that includes four (4) 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. All new hires are required to complete the specialized training course presented by the National PREA Resource Center during new hire orientation and annually at DJRC. Designated mental health staff present the four-hour on-line specialized training course annually to all medical and mental health staff. Participants are required to successfully complete the course during the final examination. Documentation of completed training is maintained by the mental health administrator.

Per the PAQ, 96 medical and mental health care practitioners work regularly at the facility and 100% have received specialized training.

115.35 (b) Per interviews with the medical and mental health administrators, forensic examinations are not performed at the facility. The forensic medical examinations are conducted off-site at the Nashville General Hospital located at 1818 Albion St, Nashville, TN 37208 and/or the Vanderbilt University Medical Center located at 1211 Medical Center Drive, Nashville, TN 37232.

115.35 (c) TDOC Index #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. This training shall be documented on the TDOC Training Roster, CR-2245, and copies are provided to the facility training specialist.

Completion of the specialized PREA training for 50 medical and mental health staff were confirmed by staff signatures on the training rosters (CR-2245) acknowledging their receipt of the training.

115.35 (d) Per the Behavioral Health Administrator and Health Services Administrator, all staff within the departments complete PREA training per required per standard 115.32 in addition to the specialized training per standard 115.35. The PREA training is completed during new hire orientation and annually during in-service training.

Confirmation of randomly selected medical and mental health contractors'

	acknowledgment of PREA training pursuant to standard 115.32 was presented via the TDOC Employee PREA Acknowledgement, CR-3965 in addition to confirmation of completion on the DJRC PREA and Title VI Refresher Training FY 24/25 and FY 25/26 electronically stored documentation. Based on the review of agency policy, the Specialized Training PREA Medical and Mental Care Standard curriculum, medical and mental health practitioner's acknowledgement of Specialized PREA Training in addition to the PREA training pursuant to standard 115.32, and interviews, DJRC does meet all provisions of the standard.
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 3. TDOC Index #506.14.1 Housing For New Admissions (Effective 03/25/2023) 4. TDOC Index #404.05 Orientation Unit 5. TDOC Index #401.05 SAFEKEEPERS 6. TDOC Index #103.10.1 Title VI – Limited English Proficiency (LEP) 7. PREA Screening System Application 8. Documentation of Inmates' Arrival Dates 9. Completed Risk Screenings 10. Observation of Intake Risk Screening Procedures 11. Interviews with: a. Staff Who Conduct Risk Screening b. Inmate Population c. DJRC PREA Compliance Manager d. TDOC Statewide PREA Coordinator

115.41(a) (b) Pursuant to TDOC Index #404.05, an Orientation unit is identified as a unit designated at each institution for all new admissions and nonexempt offender. The unit will house each offender who arrives to their assigned facility to ensure they have been appropriately screened and classified prior to assignment to a unit/cell or job/class/program.

The institutional classification committee shall screen new admissions and nonexempt offenders, offenders returning to TDOC from a temporary absence of 90 days, offenders stepping down from any form of segregated custody (excluding punitive segregation), or protective custody utilizing Offender Orientation Checklist, CR-3920, to ensure appropriate recommendations are made regarding housing unit/cell assignment, and job/class/programming assignments.

TDOC Index #502.06 notes Classification teams or unit management teams from diagnostic classification units will interview and evaluate all inmates for sexually aggressive/victim tendencies utilizing the PREA Screening System Application located in the TDOC intranet within 72 hours of arrival. User security access to this system is requested by the Associate Warden of Treatment/ Deputy Superintendent/Assistant Warden Programs at privately managed facilities to the TDOC Statewide PREA Coordinator.

All inmates are screened, using the PREA Screening Application, upon arrival at a facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. This screening takes place within 72 hours of arrival at the facility.

Screenings are tracked on a PREA Intake Spreadsheet, CR-4202, and are reviewed within 48 hours of the Chief Counselor/designee at each facility to ensure the initial PREA screening has been completed. If the inmate has not had his/her initial assessment, the Chief Counselor will assign a counselor to conduct the assessment prior to the 72 -hour time limit.

Per TDOC Index #103.10.1, During the intake process, offenders requiring language or literacy assistance will be offered Language Identification (I Speak) Guide to determine if the offender has literacy or language deficiency. Those requiring LEP services will be documented and report to the LEP Coordinator immediately. An interpreter will be provided through utilization of institution, volunteers or contract interpreters to determine the extent of their proficiency.

TDOC Index #401.05, The PREA screening application and documentation noted on LCDG (Contact Notes (Codes SCRN) shall be completed for each safekeeper within 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 1306.

Per interview with staff who conduct risk screening, all inmates include inmates designated to the facility, those on a temporary hold status for court appearances and/or medical appointments are normally screened by staff on the day of arrival. Inmates who arrival after hours are screened the following day and/or always within 72 hours of their arrival.

The auditing team's review of the facility's' PREA Spreadsheet supported the documentation of all inmates' date of arrival, and date of initial facility's risk screening indicated all inmates were screened within 72 hours of their arrival.

The auditing team randomly selected 36 inmates who arrived at the facility throughout the review period for confirmation of timely completed initial risk screening. The review confirmed all inmates received their initial assessment normally on the day of arrival and always within 72 hours of their arrival.

Interviews conducted with the inmate population indicated they were asked the risk screening questions during the initial intake on the day of arrival during the intake process.

115.41(c) (d) (e) TDOC Index #506.14.1 notes Classification teams or units will interview and evaluate all inmates for sexually aggressive/victim tendencies utilizing the PREA Screening System Application. Additional information shall be gathered utilizing the RNA with a focus on Sections 1.8 Antisocial, Section 2 (Perpetrator) and Section 4 (Victim). Any conflicting information with the TDOC Sexual Aggressor or Sexual Victim screening should be reported to and resolved by the Classification Counselor

TDOC Index #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's approved standardized screening instrument. Copies of the Tennessee Inmate Management Information System (E-TOMIS system) PREA Screening form was presented for review. The TDOC PREA Screening determines the finding of a 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 and interview with the inmate during screening.

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 institution (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 is 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; 4) History of prior institution violence.

Per staff assigned to conduct risk screening, the risk screening questionnaire includes the requirement of the standard as noted in the DOJ Rule in addition to the sexual aggressor factors that are also included that is located in the Distributed Application program. The results of the risk screenings such as the inmate identified as a victim or an aggressor are shown in ETOMIS as the two programs work together in determining the results. The risk screenings are conducted in a private setting while the inmates are asked to provide a respond and /or additional information to each question in which their response is documented electronically. Staff also review previous obtained documentation in comparison for changes to include the inmate's mental health status and prior reports of sexual abuse as a victim or an aggressor and updating as applicable. The results of the inmates' risk screenings are maintained electronically in the TDOC record keeping database, ETOMIS.

The auditing team observed the intake process to include the completion of risk screenings during the arrival of inmates designated to the facility and those who arrived for a temporary hold status for court appearances and/or medical appointments. Staff were observed utilizing the electronic 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 screening form was identified as the Offender Information Screening form. The risk screenings interviews were conducted in an office separate from other inmates while staff read each question in a manner that fostered a comfort level for responses by each inmate. Inmates were asked to provide a response to the questions during the interview/risk screening procedures.

Interviews with the inmate population indicated those designated to the facility acknowledged a second risk assessment was completed within the first 30 days of arrival in addition to an assessment is completed annually by their counselors.

Thirty - six inmates were randomly selected for confirmation of timely risk screenings completion in accordance with agency policy and the PREA standard with no discrepancies noted. 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 observation visit.

115.41(f) (g) TDOC Index #502.06 notes An inmate's risk level is re-screened when warranted due to a referral, request, incident of sexual abuse or sexual victimization, or receipt of additional information that bears on the inmates' risk of sexual victimization or abusiveness.

Within 30 days, the inmate will be reassessed with the PREA Screening System Application reassessing the inmates for risk of victimization or abusiveness to include

any addition relevant information received by the facility since the intake screening. Inmates will be screened using the PREA Screening System Application for the following occurrences: a) Upon triggering events referrals that occur based upon observation from staff; b) Upon each occurrence of a guilty finding for a disciplinary of a sexual nature, c) Upon each substantiated finding of sexual abusiveness or sexual victimization; d) Upon an inmate being housed at a facility longer than 24 hours; e) Upon return when an inmate is away from his/her assigned facility for more than 24 hours.

Pursuant to TDOC Index #506.14.1 Within 30 days of inmate screening, the inmate shall be rescreened utilizing the PREA Screening Application to determine if the inmate has any modification or any changes that have occurred.

Per staff who conducts risk screening 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 date, 15-day review for the 30 -day rescreening and the date of the completed 30-day rescreening. Any additional information is normally received within 15 - 25 days after the inmates' arrival, therefore the reassessments are completed within 30 days of the initial assessment. The tracking log is forwarded to staff as a reminder of the upcoming reassessments to prevent occurrences of non-compliance that also documents the inmates submitted mental health referrals and date the inmates are seen by mental health.

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 990.

The auditing team reviewed facility's' PREA Spreadsheet throughout the 12-month review period that documents the inmates' date of arrival, date of initial facility's risk screening, 30-day re-screening due date and within 30 days of screening dated (date risk screening was completed). Documentation supports all inmates were noted as re-screened within 30 days of their arrival and normally not later than the 20th day of their arrival.

The auditing team's review of the randomly selected 36 inmate risk screenings supported that in addition to the initial risk screenings were completed within 72 hours of the inmate's arrival, also supported the risk screening reassessments were completed within 30 days of the inmate's arrival.

TDOC Index #401.05, notes A safekeepers' risk level shall be re-screened when warranted due to a referral, request, incident of sexual abuse/sexual victimization, or receipt of additional information that bears on an inmates' risk of sexual victimization or abusiveness.

Per staff who conduct risk screening, an additional assessment is conducted upon receiving any additional information that could result in changes in an inmate's

custody level scoring, and/or other classification 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 count room officer is notified of all classification changes such as an inmate identified as an aggressor or victim of sexual abuse to ensure immediate appropriate housing assignment changes.

Two (2) inmates on inmate sexual abuse investigations and one (1) staff on inmate sexual abuse investigation were concluded as substantiated during the review period. Documentation supports each victim and the inmates identified as aggressors were rescreened and classified appropriately in accordance with the agency policy and the standard provision.

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

Per staff who conduct risk screening, inmates would not receive discipline for refusing to cooperate during the risk screening process, however, they have never had an inmate refuse to participate. In circumstance where an inmate refuses to cooperate during the risk screening, normally they will cooperate upon being interviewed by a male staff member.

115.41(i) TDOC Index #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 Treatment/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 an interview with the DJRC PREA Compliance Manager, the agency does outline who may have access to the inmates' risk assessment within the facility the information is stored electronically. Final approval is granted to authorized staff only such as the classification team, unit managers and unit counselors by the TDOC Statewide PREA Coordinator.

Per the TDOC 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 decision to grant access is based on the job responsibilities of the employee. The request is then forwarded to the TDOC Statewide PREA Coordinator, who must also vet and approve access. Generally, Counselors, Associate Warden of Programs, and Unit Managers who supervise the Counselors are granted access to vet the Counselors' work performance.

The auditing team observed risk screening information to be securely stored within the PREA Screening System Application (Distributed Application) a computerized program accessible to authorized unit management staff only through the use of an

	encrypted password. Medical and mental health hardcopy files are securely stored in designated areas to include stored electronically and accessible only by assigned staff using an encrypted password. 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, interviews with staff and the inmate population, it is determined DJRC does meet all standard provisions
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 3. TDOC Index #506.14 Housing Assignments (Effective 09/15/2020) 4. TDOC Index #506.14.1 Housing for New Admissions (Effective 03/15/2023) 5. TDOC Index #103.10.1 Title VI - Limited English Proficiency (LEP) (Effective 02/01/2019) 6. PREA Screening Results/Housing Report 7. Interviews with: a. DJRC PREA Compliance Manager b. Staff Who Conduct Risk Screening 115.42 (a) (b) TDOC Index #502.06 outlines the mandate of the standard. Decisions concerning individual housing assignments and group activities for inmates who enter TDOC and are identified as sexual aggressors or prior sexual victims are under the supervision of the unit management. Housing, cell assignments, work, education, and program assignments are made with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually aggressive.

No inmate will be double celled until the required PREA screening has been completed. Those inmates who are deemed Sexual Aggressors or Sexual Victims will be appropriately housed until assessed by behavioral health professional or classification.

Inmates who enter TDOC and are identified as a Sexual Aggressor or a Sexual Victims on the PREA Screening System Application may be considered for protective custody placement or placement in an institution setting considered more controlled than general population. Clinical services are offered to those inmates. Clinical decisions regarding these inmates are the responsibility of the medical and behavior health staff at the diagnostic center.

Once an inmate is identified as a Sexual Aggressor or Sexual Victim at any time during his/her incarceration, the inmate is reevaluated for appropriate housing and programs.

If the PREA screen 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 the Treatment/Deputy Superintendent/Assistant Warden of Program and unit management staff via email of the required move.

Pursuant to TDOC Index #506.14.1, During the intake processing period, the Warden is responsible for ensuring that new admission and inmates returning from parole/probation or escape are appropriately searched, secured, and supervised until the following has been accomplished: a.) Classification teams or unit management teams will interview and evaluate all inmates for sexually aggressive/victim tendencies utilizing the PREA Screening System Application. Additional information shall be gathered utilizing the RNA with a focus on Sections 1.8 Antisocial, Section 2 (Perpetrator) and Section 4 (Victim). Any conflicting information with the TDOC Sexual Aggressor or Sexual Victim screening should be reported to and resolved by the classification counselor. A decision made that it is reasonably safe to house the inmates in double or multiple occupancy rooms with other inmates. Sexual Orientation shall not be the sole determining factor in facility or housing placement.

TDOC Index #506.14 notes new admission inmates and those returning from parole or escape shall be singled-celled until a determination can be made that they can be reasonably safe when double-celled. Additionally, certain factors will be taken into consideration prior to assigning inmates to a housing unit. These factors include but are not limited to their PREA status.

Pursuant to TDOC Index #103.10.1 Title VI, Unit Management staff shall monitor the housing assignments of all LEP inmates and ensure that interpretation services are provided as needed.

Per an interview with the DJRC PREA Compliance Manager, the agency uses the information collected during the risk screening intake for classification purposes to ensure the separation of housing for inmates identified as having a prior history of

	being sexually victimized or at risk of being victimized housed separately from those identified as a potential aggressor or an aggressor. Per an interview with staff who conduct risk screenings, the facility utilizes the information collected during the risk screening to ensure inmates who have a prior history of being sexually victimized and/or those who are at risk of being victimized housed are not housed with those identified as a potential aggressor or an identified aggressor. The information is also utilized to assist in identifying inmates who may require quarterly monitoring such as those who have encountered institutional sexual abuse occurrences. Furthermore, the information collected, assists staff in identifying those inmates who may require the submission of a mental health referral. Staff can conduct an override of the system if needed to identify inmates for monitoring. The auditing team requested a copy of the PREA Screening Result/Housing Report identifying the housing assignments of inmates identified as victims, potential victims, potential aggressors, and aggressors. The review confirmed those identified as victims and/or potential victims were not housed with inmates identified as a potential aggressor or an aggressor. 115.42 (c - g) Are not applicable. Based on the review of agency policies, inmate's housing and bed assignments, risk screening assessments forms, interviews and analysis, the facility has demonstrated compliance with the provisions of the standard.
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115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. TDOC Protective Services Investigation Routing Form 4. DJRC Segregation Unit Records 5. Staff Visitation Logs 6. Interviews with: a. DJRC Warden b. Staff Who Supervise Segregation

115.43 (a) (b) (c) TDOC Index #502.06 outlines the mandate of each standard provision.

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 placed in segregation/restrictive housing for this purpose shall have access to programs, education, and work opportunities to the extent possible. If inmate 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. If an extension is necessary, the SART members(s) must clearly document in the PAS the following: 1) The basis for concern for the inmates' safety. 2) The reason why no alternative means of separation can be arranged. 3) The need for emotional support services for inmate or staff who fear retaliation for reporting sexual abuse or sexual harassment, or for cooperation with investigations.

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.

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.

Zero inmates were identified by the facility as placed in involuntary segregation based solely as at a high risk of victimization.

Per an interview with the DJRC Warden, alternative housing is available throughout the various housing units. An inmate who alleges to have suffered sexual abuse would not be placed in segregated housing as alternate housing is available. Also, the inmate may request placement in protective custody which is a different level of housing than involuntary segregation. Inmates are not placed in involuntary segregation based solely on being sexual abused, nor as a first result in addressing the situation.

Per an interview with staff who supervise segregation, all inmates in segregation are allowed access to educational programs, chaplain services, medical and mental health, submission of request to library for legal and leisure material, visitation, attorney accessibility, showers, meals, personal grooming, recreation, mail services,

	and access to their tablets with calling, texting, and video calls. In addition to the inmates' access to contact the PREA Hotline via their tablets, they also have access to the unit phone and mail services. Records of Staff Visit logs to the segregation unit support program and educational privileges were provided. Work opportunities are limited, due to the required security level. 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. Interviews with staff assigned to supervise segregation and the Warden indicated inmates at risk of sexual victimization would not be held in involuntary segregated. The facility has various programs within a separate housing unit for inmates who may have difficulty functioning within the general population to include those with mental health concerns. Guidance for adjusting to their environment is provided by staff. Additionally, single cell assignment is also an alternative. However, any inmate request placement in the segregation unit. 115.43 (d) The facility reported nine (9) sexual abuse allegations. Eight (8) sexual abuse investigative case files were selected for review in which zero inmates were placed in involuntary segregated housing due to being at risk of sexual victimization 115.43 (e) 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. The review of the selected sexual abuse investigative case files confirmed zero inmates were placed in involuntary segregated housing pursuant to the standard. Based on the review of the PAQ, agency policy, staff visitation logs, inmates' segregation records, investigative case files, and interviews with Warden and staff who supervise segregation, the facility has demonstrated compliance with all the provisions of the standard.
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.6 Prison Rape Elimination Act (PREA) (Effective 10-21-2024)

3. DJRC Offender Handbook 4. DJRC Visitation Handbook 5. TDOC Index #501.01 Inmate Grievance Procedures (Effective 11/2/2022) 6. Informational Postings of the Sexual Assault Center 7. PREA Reporting Informational Posters 8. Auditor’s PREA Audit Notice 9. Completed Calls via Inmate Telephone System and Inmate Tablets 10. TDOC PREA Brochure 11. PREA Lesson Plan 12. Site Observation 12. Interviews: a. Sexual Assault Center PREA Coordinator and Hotline Coordinator b. Random staff c. Inmate Population d. Grievance Sergeant e. DJRC Facility Investigator 115.51(a) (b) TDOC Index #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 also outlines the mandate of the standard provision that the Department provides for 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 DJRC Offender Handbook notes internal opinions to report sexual assault to include various staff members, PREA Tip Line *9222 and utilization of the grievance process. The DJRC Visitation Handbook notes TDOC has established several methods for family and friends for third party reporting incidents of sexual abuse, sexual assault, sexual
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misconduct or sexual harassment on behalf of an inmate that includes the following: Tell any staff member; Call the TDOC PREA Tip line at (615) 253-8178; Call or write the Sexual Assault Center at: (615) 259-9055 at 101 French Landing Drive Nashville, TN 37228. This information was also noted on flyers posted on bulletin boards in size 18 font in both English and Spanish.

Inmates are issued a 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 auditing team observed PREA educational posters throughout the facility within frames on walls and on designated bulletin boards 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.

The “No MEAN No” posters were observed posted throughout the facility to include the Transition Center that provides information on the following topics: The Right to Report, How To Report and Victim Support Services.

Additional PREA Reporting Informational flyers were posted on bulletin boards advising staff of various options to include the telephone numbers of the following DJRC staff: DJRC PREA Coordinator, PREA Compliance Manager, Institutional Investigator, Shift Commander and the PREA Tip Line for Employees. The flyers also included the contact information for inmates to report both internal and externally while providing the PREA Tip Line *9222, mailing address for the Sexual Assault Center at 101 French Landing Nashville TN 37228, or *9555 various phone numbers for the Sexual Assault Center while noting these calls cannot be monitored. The contact information for the National Sexual Assault Hotline – 800-656-4673 was also noted.

The PREA Hotline number *9222 and *9555 was observed stenciled on walls in all inmate housing units near and on telephones in large font visual to the inmate population in both English and Spanish accessible for reviewing by the inmate population.

TDOC Index #501.01 states an inmate may submit a grievance alleging sexual abuse at any time.

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 PREA Audit Notice was confirmed as posted on January 29, 2026, and was observed on bulletin boards in all inmate housing units at main and Transition Center, site entries, food service departments, libraries, warehouse, education, medical and mental health, administrative areas, TRICOR, and visitation. The inmate population

and staff acknowledged their observance of the PREA audit notice posted throughout the facility and assigned areas. The auditing team did not receive any requests from the inmate population nor staff to participate in the interview process.

The auditing team observed The Sexual Assault Center postings on bulletin boards throughout the facility to include in all housing units, libraries, food service departments, education, TRICOR, religious services, medical, mental health, recreation, operational departments, maintenance, administration, visitation, intake, and staff offices. The posting read as such: Victims of sexual assault may also contact the following public help lines, Sexual Assault Center located at 101 French Landing Nashville, Tennessee 37228 at *9555 (Calls to this number are confidential and cannot be monitored or recorded. Additionally, victim advocacy services are available through the agency).

The auditing team utilized the inmate housing unit phone to conduct a test call at *9555 for the Sexual Assault Center. The call was immediately accepted by the Sexual Assault Center Hotline Coordinator who confirmed third-party reporting services are available. Additionally, interviews conducted with both the Sexual Assault Center Hotline Coordinator and the Sexual Assault Center PREA Coordinator/ Day Time Advocate, confirmed the center accepts third party reporting events from inmates from correctional facilities throughout the state to include the DJRC and would assist a victim in reporting sexual assault only upon their approval. However, the victim would be encouraged to report the occurrence.

Per an interview with the DJRC Facility Investigator, the facility has not received any reports of sexual abuse and/or sexual harassment from the Sexual Assault Center as reported by the inmate population throughout her tenure as the facility investigator in an excess of three years.

The reviewed of the 14 sexual abuse and sexual harassment investigative case files indicated, five (5) were reported via the institution PREA Hotline *9222; eight (8) were reported directly to staff; one (1) investigation was initiated upon staff's discovery of written correspondence during a cell search.

The auditing team observed grievance forms were accessible to the inmate population in designated areas in each of the housing units (pods) and designated marked mail depositories were identified. Only authorized staff have access to secure mailboxes for collection. An interview conducted with the Grievance Sergeant indicated the grievances boxes are checked Monday - Friday, and those identified as possible PREA allegations are logged and forwarded to the Associate Warden of Programs /DJRC PREA Coordinator and the DJRC Institution Investigator.

Formal and informal interviews with the inmate population confirmed they have a continuous opportunity to communicate with staff both verbally and in writing to include through verbal conversations, "Inmate Request Form," their issued tablets and/or purchased 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. The inmates were also aware of the reporting options available while stating the internal PREA Hotline and external PREA

Hotline numbers to include the Sexual Assault Center as a free and unmonitored call.

The auditing team requested an inmate to demonstrate their use of the tablet. The inmates were successful in completing calls for both internal and external reporting. Upon initial accessing the phone and tablets, 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, or *9111 to report a crime. instructions were given in both English and Spanish.

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. A Test call was conducted by the Auditor to 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 and a request for an email response was made. The auditor received confirmation of receipt of the voicemail message by the TDOC PREA Coordinator within an hour of the completed call.

The auditing team observed designated mailboxes were accessible to the inmate population in each of the housing units, and outside the inmate dining hall and is collected Monday through Friday while providing an avenue for the inmate population to report internally and externally to include anonymously. The facility provides inmates with paper noted as an "Inmate Request" form to communicate in writing to staff. Inmates may personally give the note to staff, address to a staff, and/or place in one of the available mailboxes designated for grievances, outgoing mail, sick call, and commissary. Internal mail is forwarded to the department in which the letter is addressed too. Outgoing mail is collected Monday – Friday except for Federal holidays and is prepared for processing by the United States Post Office.

The review of the investigative case files confirmed zero inmates elected to report an allegation of sexual abuse and/or sexual harassment via a third party.

Documentation of medical, mental health and inmate risk screenings is stored electronically. Accessibility of the documentation is restricted to authorized staff only who have been issued necessary credentials for login accessibility. Inmate records files are stored in secured cabinets in the records office that are 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. Active PREA case files are securely stored in file cabinets within the investigator's office accessible only to the assigned investigators. Closed investigative PREA case files are securely stored in the Associate Warden of Programs/Facility PREA Coordinator office. Electronically stored PREA case files are stored in the PREA Allegation System (PAS). Criminal PREA investigative case files are maintained off site at the OIC Special Agent's office.

115.51 (c) TDOC Index #502.06 outlines the mandate of the standard provision. Staff accept reports made verbally, in writing, anonymously, and from third parties. 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 DJRC staff to include contractors and volunteers, are issued and carry in their possession a DJRC PREA Refresher Card that includes guidance upon receiving notification of sexual abuse that includes first responder duties and immediate notification to the Shift Commander. Interviews conducted with random and specialized staff acknowledged their awareness of agency's policy and their obligation to accept all reports of sexual abuse and/or sexual harassment regardless of the method received that may be received verbally, in writing, anonymously and/or via a third party. Staff also acknowledged they would document the information received as soon as possible and always 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, through written correspondence, internal PREA Hotline *9222 and or externally via the toll-free call to the Sexual Assault Center at *9555 in which both numbers are accessible by telephone and their issued tablets. 115.51(d) TDOC Index #502.06 indicates 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. The majority of staff interviewed noted the PREA Hotline to include the Central Office and/or reporting via a private conversation with their supervisor, higher ranking staff and/or the DJRC Institution Investigator as their primary methods of making a private report of sexual abuse or sexual harassment. Based on the review of agency policy, PREA Lesson Plan, successful testing of internal and external reporting options available to the inmate population, interviews with staff and the inmate population, Sexual Assault Center staff, and site observation, the facility has demonstrated compliance with all the provisions of the standard.
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	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #501.01 Inmate Grievance Procedures (Effective 11/2/2022) 3. DJRC Offender Handbook 4. TDOC Inmate Grievance Procedure Handbook 5. PREA Investigative Case Files 6. TDOC Agency Website 7. Site Observation 8. Interviews with: a. Sexual Assault Center PREA Coordinator/Advocate and Hotline Coordinator b. Grievance Sergeant c. Inmates Who Reported Sexual Abuse d. TDOC Statewide PREA Coordinator 115.52 (a) TDOC Index #501.01 policy and the TDOC Inmate Grievance Procedures Handbook, provides a forum where inmates may formally raise concerns over incidents or conditions that personally affect them and allow complaints to be considered and addressed at both the institutional and department level. Procedures for the submission grievances regarding PREA are outlined within each. 115.52 (b) TDOC Index #501.01, states an inmate may submit a grievance alleging sexual abuse at any time. 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. The TDOC Inmate Grievance Procedure Handbook pages 10 -11, includes Grievances Regarding PREA. Procedures include the applicable time limits of filing, notification to the inmate and the availability of third-party reporting. The handbook also includes the procedures of filing emergency grievances in relation to PREA. The DJRC Offender Handbook page 13, notes the Department of Corrections ensures every offender the right to utilize the grievance procedure without fear of reprisal. 115.52 (c) TDOC Index #501.01 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 and such grievance shall not be referred to a staff member who is the subject of the complaint.

Per an interview with the DJRC Grievance Sergeant, all PREA related allegations are immediately forwarded to the DJRC Associate Warden of Programs/Facility PREA Coordinator and the DJRC Investigator. The DJRC Institution Investigator is responsible for investigating and communicating with the inmate.

115.52 (d) TDOC Index #501.01 states that a final decision on the merits of any portion of grievance alleging sexual abuse shall be issued by the Associate Warden of Programs 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 AWP/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 PAQ noted the following: In the past 12 months, the number of grievances filed that alleged sexual abuse was zero. In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed was zero. In the past 12 months, the number of grievances alleging sexual abuse that involved extensions because final decision was not reached within 70 days was zero.

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 three (3) inmates who reported sexual abuse indicated each were aware of the grievance process as a method to report sexual abuse and an investigation would be completed by the facility investigator. The auditing team conducted a review of 14 investigative cases that include both sexual abuse and sexual harassment, zero allegation were reported through the grievance process.

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 filing 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 file 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 DJRC Offender Handbook lists various reporting resources available to the inmates and staff. Resources include Facility PREA Tip Line (*9222), in addition to the written correspondence to the Sexual Assault Center at 101 French Landing, Nashville, Tennessee 37228, or by the Tip Line Dial (*9555) from the inmate phone system. The information is provided in both 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 a free confidential call and accepted by the Sexual Assault Center Hotline Coordinator. Interviews with both the Sexual Assault Center Hotline Coordinator and the Sexual Assault Center PREA Coordinator/Day Time Advocate confirmed their agency provide third-party reporting services for inmates at the DJRC that can only be shared with others upon approval by the victims.

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 auditing team observed grievance forms were accessible to the inmate population in designated areas in each of the housing unit. Designated mailboxes marked as "Grievances" were staged in the following locations Unit 1, Unit 2, Unit 3A, Unit 3B, Unit 3C, Unit 3D, porch of the outside dining room at the Main Compound and porch of Building 12 at the Transition Center. The grievances boxes are secured and accessible only by the assigned Grievance Sergeant and/or alternate who collects them Monday - Friday.

The lead auditor 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 was directed to leave a message with the reporting information and to include contact information for a return call. The Auditor received notification of the received call by the TDOC Statewide PREA Coordinator within an hour of the call. Per the TDOC Statewide PREA Coordinator, upon receiving third party reporting calls, the information is immediately shared with the affected institution's Associate Warden of Programs/PREA Coordinator and the facility's investigator at which time an investigation is initiated at the facility's level.

115.52 (f) TDOC Index #501.01 states after receiving an emergency grievance alleging 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 Associate Warden of Treatment /Deputy Superintendent 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 with 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. 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 sexual abuse, and/or sexual harassment allegations were reported during the 12-month review period via the grievance process, therefore, documentation of any such disciplinary actions were not applicable. Based on the review of the agency and facility's grievance policy, TDOC grievance procedures, inmate handbook, site observation and testing of third-party reporting, staff and inmate interviews, DJRC does meet all provisions of the standard
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115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. MOU with The Sexual Assault Center 4. DJRC Offender Handbook 5. PREA Audit Notice Posting 6. DJRC Designated Victim Advocate Postings 7. The Sexual Assault Center Postings 8. Testing of Inmates Phone and Tablets 9. Site Observation 10. PREA Posters 11. Interviews with: a. Formal and Informal Random Inmates

b. The Sexual Assault Center of Middle Tennessee PREA Coordinator/Day Time Advocate

c. Volunteer with Sexual Assault Center, Human Trafficking Group

d. Volunteer with Domestic Violence Recovery Class/Trauma Seminars

e. Inmates Who Reported Sexual Abuse

115.53 (a) (b) TDOC Index #502.06, outline the mandates of the standard provisions. The name and contact information of the facility's PREA Victim Advocate is posted to 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. The facility enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.

TDOC does not detain individuals solely for civil immigration purposes, therefore the mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies for such individuals were not applicable.

The Facility PREA Coordinator ensures that inmates are informed 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 during orientation.

A Memorandum of Understanding Between the Tennessee Department of Correction and The Sexual Assault Center that notes the Sexual Assault Center agrees to maintain available crisis counseling through organization's crisis hotline at any time and /or 24 hours a day.

Upon each inmate's arrival at DJRC they are issued a DJRC Offender Handbook. Page 28 of the DJRC Offender Handbook advises victims of sexual assault the following: Contact Information for reporting: the Sexual Assault Center of Middle Tennessee at 101 French Landing Nashville, Tennessee 37228 Telephone: (615) 259-9055/Tip Line Dial *9555. Calls to the Sexual Assault Center are confidential and will not be recorded. The Sexual Assault Center provides victim advocacy service.

The auditing team observed The Sexual Assault 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, intake, and staff offices. The posting read as the following: Victims of sexual assault may also contact the following public help lines: Sexual Assault Center, 101 French Landing Nashville Tennessee 37228 *9555. (Calls to this number are confidential and cannot be

monitored or recorded. Additionally, victim advocacy services are available through this agency. The postings were printed on bright yellow flyers to include in large fonts that were easily identifiable by staff and the inmate population to include those with low vision.

TDOC does not detained individuals solely for civil immigration purposes, therefore the mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies such individuals are not applicable.

The auditing team conducted a test call to *9555 The Sexual Assault Center by using the inmate housing unit telephone and inmate issued tablets during the site observation. The call was immediately accepted, and the auditor was asked to identify the facility from which the call was made and to identify the requested services. The auditor was informed that both victim advocacy services and reporting sexual abuse services were available. The Auditor's call was answered by the Sexual Assault Center Hotline Coordinator who confirmed the inmates' access to outside confidential support services that are available 24 hours a day.

The Lead Auditor conducted an interview with the Sexual Assault Center PREA Coordinator/ Day Time Advocate who confirmed victim advocacy services are available 24/7 to include on holidays. Upon an inmate reporting to the hospital for a forensic medical examination, the attending SANE/or qualified medical practitioner make notification to the Sexual Assault Center requesting a victim advocate to accompany the victim during the forensic examination for confidential emotional support. In addition to providing advocacy services during the forensic medical examination, follow-up services are available both in person and at the victim's designated correctional facility and/or via telephone at the victims' request. Victim advocacy services have been provided throughout the state both in-person and telephonically.

Per an interview with the Lead Facility Victim Advocate, who is also a License Professional Counselor, additional emotional support services provided by herself and other mental health staff who service as victim advocates within the facility, inmates have access emotional support groups that are presented from organizations from within the community. The in-person services are available on-site at the facility. The available emotional support group services include but are not limited to the following: Shelter from the Storm, House of Healing, and the Sexual Assault Center, Human Trafficking, Prison Outreach. The programs are free and available to all inmates upon their request for enrollment.

Per a License Professional Counselor (volunteer) with the Prison Outreach Organization, group therapy sessions are held weekly for sexual abuse survivors. The program is run on a 12 -month curriculum and inmates are welcome to participate. The program also has a medical accompaniment program that consists of volunteers who receive abuse training to serve as victim advocates as needed and would report to the hospital to serve as a victim upon request.

An interview was also conducted with a volunteer who provides emotional support

through the Domestic Violence Recovery Class/Trama Seminars that are held at the facility. The program deals with domestic abuse survivors that is an eight-week course and is offered three to four times yearly. The program is presented by License Therapeutic Counselors and has been offered at DJRC in an excess of 13 years.

In addition to the inmate population having access to the inmate telephones in their assigned housing units, inmates who are designated at DJRC maintain possession of their agency issued tablets to contact the Sexual Assault Center for both victim advocacy and emotional support. The Sexual Assault Center may be contacted by dialing *9555. The procedures were also confirmed during the auditing team's assessment of the inmate telephone system as all calls were successfully completed. Additionally, the instructions were available in English and Spanish.

General mailboxes are accessible to the inmate population in each of the housing units, and outside the inmate dining hall. The outgoing mail is collected Monday through Friday while providing an avenue for the inmate population to report internally and externally to include anonymously. The facility provides inmates with paper noted as an "Inmate Request" form to communicate in writing to staff. Inmates may personally give the note to staff, address to a staff, and/or place in one of the available mailboxes designated for grievances, outgoing mail, sick call, and commissary.

An interview with staff assigned to the facility mailroom confirmed the inmates' outgoing mail is sealed by the inmate. Written correspondence between inmate and The Sexual Assault Center is not monitored by the mailroom staff and would be treated as legal mail.

Formal and informal interviews with the inmate population 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 needed. However, since the issuing of tablets, the tablets are their most common use of communicating with family and friends.

The inmate population also acknowledged their awareness and observation of available advocate services information posted for the Sexual Assault Center and how to access the services via phone or use of their tablet a *9555. Each were also aware that the calls would be free and confidential as this information is posted. However, zero inmates interviewed indicated they had attempted to attempted to communicate with the Sexual Assault Center via phone, as there are numerous options available within the facility.

115.53 (c) Pursuant to TDOC Index #502.06. The TDOC maintains 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.

The agency has established a Memorandum of Understanding (MOU) with The Sexual

	Assault Center. Documentation of the MOU was provided for review. The MOU was signed by the previous Sexual Assault Center Vice President of Programs on January 16, 2014, and by a previous TDOC Commissioner on January 17, 2014. However, both agencies acknowledged the continuous commitment of the MOU. The MOU includes the Sexual Assault Center maintain available crisis counseling through the organization crisis hotline at any time and/or or 24-hours a day. In addition to maintain confidentiality as outlined in the Sexual Assault Center informed consent form. Based on the review of agency policies, facility's Inmate Rules and Regulation Handbook, postings of victim advocacy services provided by the Sexual Assault Center and DJRC Facility Victim Advocate, documentation and confirmation of effective MOU between TDOC with The Sexual Assault Center, interviews with the Sexual Assault Center PREA Coordinator, and facility victim advocate and confirmation of available victim advocacy services, and site observation, the facility does meet all standard provisions.
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115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.6 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 3. TDOC Index #501.01 Inmate Grievance Procedures 4. TDOC Index #507-01 Visitation (Revised May 15, 2020) 5. DJRC Visitation Handbook (2026 -2027) 6. DJRC Offender Handbook 7. PREA Posters and PREA Reference Memorandums 8. TDOC PREA Brochure 9. TDOC Agency Website 10. Testing of Third-Party Reporting Procedures 11. Site Observation

12. Interviews:

- a. Inmate Population
- b. Random Staff
- c. Sexual Assault Center PREA Hotline Coordinator
- d. DJRC Mailroom Staff

115.54 (a) TDOC Index #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.

Third party reporting information was observed posted on bulletin boards accessibility for viewing to the inmate population, staff to include volunteers and contractors and visitors in all housing units, program areas, operational departments, food services, warehouse, recreation, medical and mental health departments. The notices the available resource for reporting confidential and free reports to outside agencies via third-party by writing to the Sexual Assault Center located at 101 French Landing Nashville, TN 37228 by dialing *9555, and (615) 259-9055 (from outside the prison). These phones calls are not monitored or recorded. The information is posted in both English and Spanish and in large font that is easily visible for those individuals with low vision.

The DJRC Visitation Handbook page 20, include the agency facility's zero tolerance for incidents of sexual assault. The Visitation Handbook also notes TDOC has established available third party options that allow family and friends to report incidents of sexual abuse, sexual assault, sexual misconduct or sexual harassment on behalf of an inmate that includes the following: Tell a staff member; Call the TDOC PREA TIP line at (615) 253-8178; Call or write the Sexual Assault Center at: (615) 259-9055 or 101 French Landing Nashville, TN 37228. Additional information can be found on the agency website at: <https://www.tn.gov/correction/state-prisons/prison-rape-elimination-act.html>.

Upon each inmate's arrival at DJRC they are issued a DJRC Offender Handbook that is available in English and Spanish. The DJRC handbook page 29, notes inmates may report sexual assault to the Sexual Assault Center by dialing *9555/ (615) 259-9055 or via mail or at 101 French Landing Nashville, TN 37228. Calls are noted as confidential and will not be recorded.

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.

Per the TDOC Inmate Grievance Procedures, 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.

The PREA Audit Notice was observed posted on bulletin boards in all inmate housing units to include the Transition Center, food service areas, libraries, intake, warehouse, maintenance, program areas, education, medical and mental health, facility entrances, and visitation areas. The Audit notice was confirmed posted on January 8, 2026, an excess of six weeks prior to the site observation.

Formal and informal interviews with staff and the inmate population to those with low vision, hearing disabilities, cognitive disabilities, and physical disabilities confirmed their awareness that a third-party individual could report sexual abuse and/or sexual harassment on their behalf.

Per an interview with DJRC 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 Sexual Assault Center, the PREA Auditor and others as an option in a private manner.

The auditing team conducted a test call for confirmation of third-party reporting accessibility to the inmate population through use of the inmate housing unit phones and an inmate's tablet during the site observation. The call was successfully completed upon dialing *9555. The call was received by a Sexual Assault Center Hotline Coordinator who confirmed 24-hour Crisis Line availability for reporting upon approval by the caller.

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. A Test call was conducted by the Lead Auditor to 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 and a request for an email response was made. The auditor received confirmation of receipt of the voicemail message by the TDOC PREA Coordinator within an hour of the completed call. Per the TDOC Statewide PREA Coordinator, upon receiving third party reporting calls, the information is immediately shared with the affected institution's Associate Warden of Programs/PREA Coordinator and the facility's investigator at which time an investigation is initiated at the facility's level.

The Lead Auditor conducted an interview with the Sexual Assault Center Hotline Coordinator who confirmed the center accepts third party reporting events from inmates from correctional facilities throughout the state to include the DJRC. They also indicated they would assist a victim in reporting sexual assault at their request. Additionally, they have received various calls from DJRC to include reports of sexual abuse and sexual harassment.

The review of the investigative case files confirmed zero inmates elected to report sexual abuse or sexual harassment via a third party.

	The auditing team did not receive any written correspondence nor verbal request from the inmate population or staff to include contractors and volunteers to participate in the interview process during the site observation. Based on the review of agency policies, site observation, testing of available third-party reporting procedures, and interviews, the facility does meet compliance.
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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. Debra K. Johnson Rehabilitation Center Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. TDOC Index #103.02 Incident Reporting (Effective 03/15/2020) 4. TDOC Index #305.03 Employee/Offender Interaction (Effective 05/15/2020) 5. Office of General Counsel Department of Human Services Inter-Office Correspondence 6. DJRC PREA Refresher Cards 7. Site Observation 8. Interviews with: a. DJRC Warden b. Health Services Administrator c. Behavioral Health Administrator d. TDOC Statewide PREA Coordinator e. Randon Staff 115.61(a) 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. Pursuant to TDOC index #305.03, An employee who witnesses or knows of a violation

of the policy must promptly report the violation. An employee who fails promptly to report a violation shall be subject to disciplinary action, up to and including termination. An employee who retaliates against any person for reporting or providing information concerning a violation of the policy shall be subject to disciplinary action, up to and including termination.

TDOC Index #103.02 outlines the mandate of reporting that includes allegations of sexual abuse and sexual harassment within designated timeframes to the appropriate agency officials and in the manner in which all reports are to be documented.

All staff to include contractors and volunteers, are issued the DJRC PREA Refresher Cards that lists Staff Duty to Report: Knowledge, Suspicion or Information of sexual abuse and various ways to report privately in addition internally and externally. Staff including contractors and volunteers were observed in possession these cards throughout the site observation.

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.

115.61(b) 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 security and non-security staff confirmed their awareness that information of reported sexual abuse and/or sexual harassment would only be shared with authorized staff necessary for the treatment, investigative purposes and/or other security and management decisions. The information would be shared with those such as the Shift Commander, higher level supervisory staff and the investigative staff.

115.61(c) TDOC Index #502.06 notes the mandate of the provision. Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners are 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. Facility staff report all allegation of sexual abuse and sexual harassment, including third party, and anonymous reports,

Interviews with both medical and mental health providers indicated at the initiation of services during the intake process, the inmates are informed of their duty to report and their limitations of confidentiality in which the inmate signs a consent form. Consent forms are also completed annually by the inmates. Staff are required to report immediately to the shift commanders and make notification to their immediate supervisors. Neither staff reported they have received direct notification of an allegation of sexual abuse and/or sexual harassment by an inmate. However, both acknowledged their duty to report per their licensing bodies, TDOC policies and the state of Tennessee as a mandatory reporting state.

115.61(d) Per interviews with the DJRC PREA Coordinator, and DJRC Warden, although

	the facility is designated to house youthful offenders under the age of 18, none has been assigned in an excess of three years. However, inmates identified as vulnerable adults may be housed. Per an interview with the TDOC Statewide PREA Coordinator, 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 a copy of the Tenn code Ann 71-6-101 Chapter 6 Programs and Services for Abused Persons (Adult Protection) in addition to 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 are not required to investigate allegations of abuse, neglect or exploitation of persons in jails/correctional facilities due to the agency having a recognized interval investigative process. DJRC is designated to house females under the age of 18 years old. However, zero inmates were reported as being housed at the facility for an excess of three years. The review of an inmate roster that included their birth dates, confirmed inmates under the age of 18 years old were not assigned. Sexual abuse involving inmates who are considered as a vulnerable adult under a State or local vulnerable persons statute were not reported. 115.61(e) 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 DJRC Warden, all reported allegations of sexual abuse and/or sexual harassment are immediately forwarded for an investigation by the appropriate agency investigators such as the facility investigator and/or an OIC Special Agent. Based on the review of agency policies, PREA Refresher Card, site observation, interviews and analysis, the facility has demonstrated compliance with all the provisions of this standard.
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115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (10/21/2024)

	3. Interviews with: a. Agency Head Designee b. Warden c. Random staff 115.62 (a) TDOC Index #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." Per the PAQ, the number of times within the past 12 months, in which the facility determined that an inmate was subject to a substantial risk of imminent sexual abuse was zero. The DJRC Warden indicated that staff initially conduct a risk screening on all inmates upon their arrival. Upon learning that an inmate was subject to a substantial risk of imminent sexual abuse immediate actions would be implemented to protect the inmate to include alternate housing as needed. Such an inmate would never be placed in involuntary segregation as the first result as alternate housing is available. However, an inmate may request placement in segregation. An interview with the Agency Head Designee indicated TDOC has an immediate response system in place while 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, they are no longer fearful and want to return to the compound. Interviews with 16 random staff to include security, and non-security indicated all would immediately remove the inmate identified as being subject to a substantial risk of imminent sexual abuse from the area of threat, secure or maintain a visual on the inmate and immediately notify the Shift Commander of the circumstances. Based on the review of agency policy, interviews and analysis, the facility has demonstrated compliance with this standard.
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115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review):

1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ)

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

3. Confirmation of Documented Notification to Another Correctional Facility

4. Interview with:

a. Agency Head Designee

b. Warden

115.63 (a) TDOC Index #502.06 notes, When an inmate report an allegation for an incident that occurred in another correctional setting prior to arriving to their assigned facility, the following occurs; 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.

Per an interview with the TDOC Agency Head Designee, in such instances as facility reporting and/or receiving an unreported allegation, the designated point of contact is the TDOC Statewide PREA Coordinator, who in turn will notify Warden, the Facility's PREA Coordinator, and the facility's institutional investigator.

The PAQ indicated the number of allegations the facility received that an inmate was abused while confined at another facility was one (1).

Notification of the inmate's report of sexual abuse/sexual harassment was documented as forwarded to the affected facility's supervisory designee by written correspondence.

115.63 (b) (c) In accordance with TDOC Index #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.

Documentation supported the DJRC Warden forward notification to the affected correctional facility administrator within 24 hours of the reported sexual abuse

115.63 (d) Per TDOC Index #502.06, The Warden/Superintendent who receive such notification shall ensure the allegation is investigated in accordance with TDOC policy.

The facility reported in the past 12 months that the number of allegations of sexual abuse the facility received from other facilities was zero.

Per an interview with the DJRC Warden, upon receiving notification from another agency and/or facility that an incident of sexual abuse and/or sexual harassment have occurred regardless of when, an investigation would be immediately initiated by the appropriate TDOC investigators. He further stated the most recent allegation of

	sexual abuse and/or sexual harassment that was reported to have occurred at DJRC after an inmate's departure was reported in 2020. Based on the review of agency policy, documentation of timely notification to the applicable correctional facility, and staff interviews, the facility does meet compliance with the standard provisions.
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115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. DJRC Index #502.06.2.-1 Prison Rape Elimination Act (PREA) Allegations, Investigations, and Sexual Abuse Response Teams (SART) (Effective 07/15/2025) 4. DJRC PREA Refresher Card 5. Sexual Abuse Investigative Case Files 6. Interviews with: a. Inmates Who Reported Sexual Abuse b. Random Staff Interviews c. Security First Responder d. Non - Security First Responder 115.64 (a) (b) TDOC #502.06 outlines the mandate of the standard provisions. Security separates the alleged victim and abuser. Security preserves and protects any crime scene until appropriate steps can be taken to collect any evidence. Security staff notifies SART. 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 is 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.

DJRC Index #502.06.2-1 outlines the first responder responsibilities as the following:

- 1.) As first responder to a PREA allegation he/she is to instruct the alleged victim to not take any action that could destroy physical evidence and then immediately notify the shift commander
- 2.) DJRC will ensure the alleged victim does not remove clothing, shoe, use restroom, brush teeth, eat or drink until examined by medical.
- 3.) DJRC will ensure the alleged victim and alleged abuser are separated.
- 4.) DJRC security will escort the alleged victim to medical.
- 5.) If the alleged incident occurred within the past 72 hours, the crime scene must be preserved and protected until appropriate steps can be taken to collect any evidence.
- 6.) Once the alleged victim is safe, the shift commander shall initiate the Sexual Abuse Incident Check Sheet, CR-3776.
- 7.) The Sexual Abuse Response Team (SART) shall be notified by security staff.

Staff are issued individual laminated cards to carry on their person. The card is noted as the DJRC PREA Refresher: Duty to Report: Knowledge; Suspicion or Information. The PREA Act's Steps include the following:

- 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(s) are safe, all pertinent information will be documented on the PREA Allegation Screen.

The PAQ noted nine (9) sexual abuse allegations were reported during the 12-month review period. The PAQ noted the number of times the first security staff member to respond to the report separated the alleged victim and abuser as nine (9).

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

Per the PAQ, noted in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate steps could be taken to collect any evidence was zero.

The PAQ noted of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report requested 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 was zero.

Per the PAQ, Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report ensured that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating was zero.

	The review of the selected eight (8) sexual abuse and six (6) confirmed there were zero reported sexual abuse allegations that involved circumstances applying separation, or staff's preservation and/or the collection of physical evidence other than written correspondence. Per an interview with a security first responder, the victim and the aggressor had previously separated prior to the victim reporting the allegation. The victim remained with the staff member, and the Shift Commander was immediately notified. The reported sexual abuse did not warrant the preservation and/or collection of evidence. Interviews with three (3) inmates who reported sexual abuse. Each reported victim stated staff responded immediately upon reporting, however there was no physical evidence to collect as the allegation reported involved touching only. The review of their investigative case files confirmed two (1) was reported via the PREA Hotline and one (1) was reported verbally to security staff. The PAQ indicated of the allegations that an inmate was sexually abused in the past 12 months, the number of times a non-security staff member was the first responder as two (2). A non-security staff first responder stated the victim had previously removed herself from the aggressor prior to entering their office to report the sexual abuse allegation. The Shift Commander was immediately notified, and the victim remained in their office pending the arrival of the Shift Commander. The reported incident did not warrant the preservation and/or collection of evidence. 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. Interviews with random staff and specialized staff indicated all were aware of their responsibilities as a first responder. Staff stated they would immediately separate the victim and aggressor, advise both 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 Refresher card that outlines the Actions Steps upon an inmate reporting sexual abuse that was observed in their possession during the site observation. Based on the review of agency policy, review of sexual abuse investigations, PREA Refresher Card, and interviews with security and non-security first responders, random staff and inmates who reported sexual abuse, DJRC does meet all provisions of the standard.
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard

	Auditor Discussion Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. DJRC Index #502.06.2-1 Prison Rape Elimination Act (PREA) Allegations, Investigations, and Sexual Abuse Response Team (SART) (Effective 07/15/2025) 4. Interview: a. Warden 115.65 (a) TDOC Index #502.06 mandates that each institution must develop a written policy and procedure to coordinate actions to be taken in response to an incident of sexual abuse and to ensure compliance with the mandates of the TDOC Index #502.06 policy. 115.65 (a) TDOC Index #502.06 mandates that each institution must develop a written policy and procedure to coordinate actions to be taken in response to an incident of sexual abuse and to ensure compliance with the mandates of the TDOC Index #502.06 policy. The facility's policy DJRC Index #502.06.2-1 note it is the policy of DJRC to provide a safe, humane and appropriately secure environment, free from threat of sexual assault /harassment for all inmates, by maintaining a program of prevention, detection, response investigation and tracking of all alleged and substantiated sexual assault and sexual harassment. All PREA sexual abuse and sexual harassment allegations will be investigated in a timely, efficient, and confidential manner in accordance with federal guidelines. DJRC will have zero tolerance for incidence of sexual assault and sexual harassment. The policy outlines the facility's procedures for the following: First Responder Responsibilities; Medical Response/ Access to Emergency Care; Follow-up Care for Sexual Abuse; Inmate Access to Facility and Outside Confidential Support Services; Sexual Assault Response Team Response that includes an investigation; Incident Review; Monitoring for retaliation. Per an interview with the DJRC Warden, the facility's coordinated response is outlined in the DJRC Index #502.06.2-1 policy. Based on a review of the agency and facility's policy, and Wardens' interview, the facility has demonstrated compliance with this standard.
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115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. Tennessee Code Annotated 50-1-207 3. Interview with: a. Agency Head Designee 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 confirmed TDOC does not have any collective bargaining agreements for the 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. Based on a review of the Tennessee Code, interview and analysis, the facility has demonstrated compliance with this standard.

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (10/21/2024) 3. Retaliation Monitoring Documentation 4. Interviews with: a. Agency Head Designee b. DJRC Warden c. Staff Charged with Conducting Retaliation Monitoring

d. Inmates Who Reported Sexual Abuse

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

The policy notes the following: Acts of sexual abuse against inmates or retaliation against inmates who refuse to submit to sexual activity, or intimidation of a witness is prohibited. 2) Retaliation against individuals because of their involvement in the reporting or investigation of sexual assault or sexual contact/sexual harassment is prohibited; 3) All incidents of sexual abuse or related intimidation/retaliation will result in corrective and/or disciplinary action, up to and including termination

The DJRC Associate Warden of Programs/DJRC PREA Coordinator is the designated staff member to conduct retaliation monitoring for staff.

A Licensed Professional Counselor is designated to conduct retaliation monitoring for the inmate population.

115.67 (b) (c) (d) TDOC Index #502.06 outlines the mandate of the standard provisions. The facility employs 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.

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, 60, and 90 days intervals. The monitoring starts 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 for over 90 days if the initial monitoring indicates a continuing need. Items 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 reassignments of staff.

If an inmate being monitored for retaliation transfers to another facility whose primary purpose is to house TDOC inmates, the facility's PREA Coordinator from the sending facility must notify the facility's PREA Coordinator at the receiving facility of the required monitoring in writing using an official letterhead. The receiving facility will be responsible for conducting monitoring and forwarding the required PREA Retaliation Review (inmate), CR-3963, to the sending facility for placement in the PREA investigative file. Should the inmate transfer to another facility prior to completing the 90-day cycle of monitoring, the original sending facility is notified by

the original receiving facility so that the notification of the monitoring requirements can be sent to the new facility by the original sending facility to ensure the monitoring process can be continued for the inmate.

The PREA Retaliation Review (Inmate), CR-3963, includes staff 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 Sexual Assault Response Team (SART) Members during the scheduled monthly SART meeting.

The facility provided documentation of completed 90-day retaliation monitoring for victims, aggressors and inmates identified as aiding in the investigative process of both sexual abuse and sexual harassment investigations. The review of the investigative case files confirmed zero inmates and/or staff were documented as requiring monitoring in an excess of 90 days. The monitoring staff documented statements made by those monitored individuals to include their personal perception of occurrences and any concerns they may have. The review indicated that a victim's concerns regarding a change of their housing assignment were immediately addressed. However, the housing assignment change was not identified as a form of retaliation. Although inmates have individual interaction with staff assigned to conduct retaliation monitoring, the monitoring details of all are discussed during the regular scheduled monthly SART meetings with other members of SART.

The PREA Retaliation Review (Staff), CR-3982, requires SART staff conducting the retaliation monitoring for staff identify 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?

Per an interview with the Agency Head Designee, TDOC monitors victims 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 to another facility. 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.

Per an interview with the DJRC Warden, measures taken to protect inmates includes conducting retaliation monitoring by the assigned staff who communicates directly with the inmates being monitored and determining whether the inmate has been negatively affected since reporting or cooperating with a PREA allegation to include unjustifiable changing in housing, unjustified discipline and/or programming, loss of job, and/or sudden grievances filed by the affected inmates. An investigation would be initiated by the facility investigator upon the suspicion of retaliation.

The DJRC Warden stated designated staff are assigned to conduct staff retaliation monitoring at 30-day intervals for a minimum of 90 days and longer if needed. The monitoring process includes identification of unjustified discipline, post assignment changes, increase in unscheduled leave, and grievances submitted by the inmate population on the monitored staff. Any form of potential retaliation would be immediately addressed to include the initiation of an investigation by the facility investigator.

An interview was conducted with a staff member assigned to conduct retaliation monitoring for the inmate population to include for sexual abuse and sexual harassment reported allegations. Retaliation monitoring is completed for those identified as victims, aggressors and those who have assisted with an investigation. Areas reviewed are identified in the TDOC PREA Retaliation Review (Inmate) CR-3963, questions 10-17 and is completed for each. The reviewing areas include any unjustifiable changes in the housing, programming, job assignment, write-up and applied discipline, and/or inappropriate comments made to those monitored. All parties are encouraged to express their concerns which are immediately addressed. The retaliation monitoring may also include the review of video equipment to observe the inmate's interaction with others in addition to observing them during the monthly SART walk. The information gathered is also shared with other members of the SART during the regular scheduled monthly SART meetings. Private meetings with those inmates being monitored are held within her office in the mental health department that provide the inmates with a comfort zone. The initial contact is made by the staff member; and the individual meetings are scheduled at 30-day intervals at 30, 60 and 90 days for a minimum of 90 days. However, there is no set time frame in which retaliation monitoring will end as it may continue beyond 90 days if deemed necessary such as any concerns that may need to be addressed. The inmates are encouraged to express any concerns they may have. Additionally, retaliation monitoring may be resumed if deemed necessary. Upon an investigation being determined as unfounded, the retaliation monitoring is discontinued at that point.

However, as she is visible and accessible to the inmates throughout the facility on a regular basis, the inmates are very comfortable approaching her as she also provides individual therapy and serves as the facility's lead victim advocate.

Staff assigned to conduct staff retaliation monitoring, indicated all staff identified as an aggressor in sexual abuse and sexual harassment investigations are monitored for possible retaliation. The retaliation monitoring period begins 30 days after the allegation is reported and continues at 60 days, 90 days and beyond if there are any concerns or signs of possible retaliation being suspected and/or confirmed. Upon an investigation finding of Unfounded, the retaliation monitoring immediately ends. The monitoring sessions are conducted in person and via phone as some staff are not permanently assigned to the facility, such as maintenance staff who are temporarily assigned to perform special projects at DJRC and other TDOC facilities. Any areas of concerns identified by the staff member would be reviewed, such as unjustifiable write-up and/or issued discipline, denial of requested leave, denial of promotion, unjustifiable change of shift or days off, etc. As Associate Warden, she has the authorization to request documentation for review such as staff's current and previous schedule and any imposed disciplinary actions. Although the SART members discuss the investigative cases and the retaliation monitoring completed each month, the identity of the staff member is not revealed with the team for the purpose of confidentiality.

The review of the investigative case files for both inmate on inmate and staff on inmate sexual abuse and sexual harassment confirmed the victim, aggressors and those identified as assisting in the investigation were monitored for 90 days at 30-day intervals for all unsubstantiated and substantiated investigative findings in addition to at the point an investigative finding were concluded as Unfounded.

The review also confirmed the requirement of continued retaliation monitoring for those inmates who were transferred to other TDOC facilities was forwarded to their newly designated TDOC facility for completion. The completed retaliation monitoring was forward to DJRC upon completion.

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

Interviews with three (3) inmates who reported sexual abuse acknowledged they felt protected against possible retaliation from staff and the inmate population after reporting the sexual abuse. Each confirmed they met regularly with the Licensed Professional Counselor that included services for retaliation monitoring and emotional support

Zero inmates were housed in segregation solely for risk of sexual victimization/who alleged to have suffered sexual abuse during the site observation for the completion of interviews.

115.67 (e) (f) TDOC Index #502.06 outlines the mandate of the standard provision. If any other individual who cooperates with an investigation expresses a fear of retaliation, the Department takes appropriate measures to protect that individual

	against retaliation. The Department's obligation to monitor is terminated if the result of the investigation determines that the allegation is unfounded. 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 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. Per an interview with the DJRC Warden, upon a suspicion of retaliation by either staff or inmate, the individuals would be separated, and an investigation would be initiated immediately by the facility investigator and followed by appropriate discipline as applicable. The review of the investigative case files that included the completed retaliation monitoring indicated there were zero circumstances where retaliation was identified for any staff and/or inmate being monitored. Based on the review of the agency's policy, completed retaliation monitoring, and interviews to include staff who conduct retaliation monitoring, and inmates who reported sexual abuse, the facility does meet compliance with all standard provisions.
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115.68 Post-allegation protective custody	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. Interviews with: a. Warden b. Staff Who Supervise Segregation 115.68 (a) TDOC Index #502.06, 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 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 segregation/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. (4) 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 OMS.

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.

Per the PAQ and the review of investigative case files inmates who alleged to have suffered sexual abuse zero were held in involuntary segregated housing in the past 12 months of the review period.

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 was identified as zero.

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.

Per an interview with the DJRC Warden, alternative housing is available throughout the various housing units. An inmate who alleges to have suffered sexual abuse would not be placed in segregated housing as alternate housing is available. Also, the inmate may request placement in protective custody which is a different level of housing than involuntary segregation. Inmates are not placed in involuntary

	segregation based solely on being sexual abused, nor as a first result in addressing the situation. Per an interview with staff who supervise segregation, inmates who report sexual abuse are not held in involuntary segregation. The aggressor would be relocated to a different housing unit throughout the investigative process but not always assigned to segregation. All inmates in segregation are allowed access to educational material, recreation, medical and mental health services legal and library material, religious material, access to their tablets with calling, texting, video calls. The review of the sexual abuse investigative cases confirmed zero inmates who reported sexual abuse were placed in segregation based solely on the standard provision. Therefore, documentation of an inmate's placement in segregation housing pursuant to the standard was not applicable. Based on the review of agency policy, PAQ, interviews with the Warden and staff who supervise segregation, and PREA investigative case files, the facility has demonstrated compliance with the standard.
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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. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 3. TDOC Index #305.03 Employee/Offender Interaction 4. TDOC Index #107.01 Office of Investigations and Conduct (OIC) Roles and Responsibilities (Effective 05/09/2024) 5. TDOC PREA Investigation Guide 6. PREA Investigative Case Files 7. Site Observation 8. Interviews with: a. OIC Special Agent b. DJRC Institution Investigator

c. Inmates Who Reported Sexual Abuse

d. DRJC Warden

e. TDOC Statewide PREA Coordinator

f. DJRC PREA Compliance Manager

115.71(a) Pursuant to TDOC Index #107.01 the Director of OIC has authority to initiate investigation and matters of “automatic jurisdiction.” Automatic jurisdiction is a term used to denote incidents or allegations which may call for an immediate OIC response, or for automatic investigative action. Commissioner authorizations for incidents and or allegations of this nature are both implied and understood without written authorization. Once initiated, prompt notification will be made to the commissioner by the Director of OIC. Automatic jurisdiction is maintained in the following incidents or allegations: (a) Rape or Prison Rape Elimination Act (PREA) related allegations.

TDOC Index #107.01 states the OIC consists of the investigative Unit (IU) that performs both administrative and criminal investigations and maintains both administrative and criminal investigative report files. An administrative case is any case which involves TDOC employees, employees of privately managed institutions, and contract employees alleged to have violated a TDOC or Tennessee Department of Human Resources (TDOHR) policy or protocol. A criminal investigation is any case which involves a subject who is alleged to have committed a violation of the Tennessee Code, Annotated Criminal Code or a federal criminal law or statute.

TDOC Index #502.06 states SART Investigations are conducted within 72 hours of receiving the allegation. 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.

Pursuant to TDOC Index #305.03 Allegations of employee sexual misconduct, sexual harassment, sexual contact and /or sexual abuse shall be investigated in accordance with TDOC policies and Tennessee statutes. If the accusations are found meritorious, the employee(s) shall be subject to disciplinary actions, up to and including termination, or appropriate actions where necessary, in accordance with TDOC policies and Tennessee statute. Consent on the part of an offender is not a defense on the part of the employee as a response to charges of any form of sexual misconduct.

The PREA Investigative Guide outlines information to aid investigators in the completion of investigative reports in accordance with the standard.

The facility reported 21 allegations of sexual abuse and/or sexual harassment during the 12 -month review period. Each of the reported allegations were concluded as an administrative investigation. Zero allegations included possible acts of criminal

nature.

Interviews with both the OIC Special Agent and DJRC Institution Investigator indicated upon receiving an allegation of sexual abuse and/or sexual harassment, the allegation is required to be initiated in the PREA Allegation System (PAS) within 24 hours at which time the Central Communication Center is notified. Both stated regardless of how an allegation is reported to include anonymously or by a third-party, all allegations of sexual abuse and sexual harassment are investigated.

Fourteen of the 21 investigative case files were selected for review. The review of the eight (8) sexual abuse, and six (6) sexual harassment investigations confirmed all allegations were uploaded within the PAS on the date staff was identified as receiving notification. Each of the investigations was determined to be completed promptly by the DJRC Institution Investigator. Specifically, five (5) were completed within 10 days of being reported; seven (7) were completed within 30 days of being reported and two (2) were completed within 44 days of being reported

The investigative case files were identified as thorough and objectively completed that included audio recorded statements, notes completed by the investigative staff, photographs, documented review of video surveillance observations, applicable inmate phone calls, credibility assessments of victims and aggressors, review of evidence collected, identified policy violations, inmates and/or staff involvement in prior reports of sexual abuse and/or sexual harassment to include as alleged victims and/or aggressors, detailed summaries of the events and evidence reviewed and the final conclusion of the investigative findings. The final investigative findings were determined to be based on the preponderance of the evidence collected.

115.71(b) TDOC Index 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 TDOC PREA Investigation Guide notes the investigators will receive the specialized training in conducting sexual abuse investigations in a confinement setting of all allegations of sexual abuse and sexual harassment.

TDOC Index #502.06 states, Sexual Assault Response Team (SART) 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. IU Special Agents are contacted immediately when circumstances warrant further actions pursuant to criminal findings.

Interviews with the DJRC Institution Investigator and the TDOC OIC Special Agent confirmed each have received specialized training to conduct sexual abuse

investigations pursuant to standard 115.34.

The DJRC Institution Investigator is a member of the SART and is assigned to conduct administrative investigations of alleged sexual abuse and sexual harassment.

Certifications for the successful completion of training at the Tennessee Bureau of Investigation Special Agent Academy in addition to the State of Tennessee Peace Officer Standard and Training Commission were presented for the assigned OIC Special Agents who are sworn law enforcement officers for the TDOC and are authorized to conduct both administrative and criminal investigations related to TDOC.

The review of the selected 14 investigative case files confirmed each was completed as an administrative investigation by the DJRC Institution Investigators.

115.71(c) TDOC Index #502.06 indicates the IU (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.

The OIC Special Agent and DJRC Investigator identified upon the Shift Commander's notification of the reported allegation, he/she immediately contact the facility's investigator. However, the OIC Special Agent is contacted immediately when circumstances of the allegations may a warrant further pursuant to a criminal finding. The allegation must be initiated in the PREA Allegation System within 24 hours of being reported at which time the Central Communication Center (CCC) is automatically notified of the case. The assigned investigator is required to initiate the investigation within 72 hours of each reported allegation. The first step is ensuring staff initiate first responder duties by separating the victim and the aggressor and securing the crime scene area. The alleged victim would be interviewed first in addition to all staff who have had contact with the victim. If applicable, the victim would be transported to the outside hospital for a forensic examination and clothing, and other possible physical evidence would be collected, labeled and logged onto the chain of custody reports. Lab work is transported to the Tennessee Bureau of Investigations for testing while completing an additional chain of custody. A review is conducted of available video within the identified area, in addition to a review of the inmate phone and tablet records to include phone records of other inmates in the area, photographs of affected cell/area and available evidence, photographs of victim and aggressor to include noted injuries, in addition to the inclusion of medical evaluations and forensic examinations results as applicable. Recorded interviews with the victims, aggressors and witnesses and an individual credibility assessment of each is completed. All collected evidence is included in the investigative report and utilized in the determination of the investigative finding upon identifying applicable policy violations.

The investigative process also includes the review of video within the effective area in determining whether staff's actions and/or failure to follow policy contributed to the alleged assault. In such an occurrence, a separate administrative investigation would

be conducted.

Per interviews with investigative staff, an inmate's prior history as a victim of sexual victimization and/or an inmate having a prior history of sexual abusiveness would be documented and monitored in the offender management program as the agency monitors all inmates identified as having a history as a potential aggressor and/or as an aggressor and those of sexual victimization.

115.71 (d) Per TDOC Index #502.06 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.

Per the OIC Special Agent, although the Agents do communicate with the State District Attorney General regarding possible prosecution, they do not consult with them prior to conducting compelled interviews as they are knowledgeable the degree of evidence necessary to submit the case for prosecution.

115.71(e) TDOC Index #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.

Per the OIC Special Agent, and DJRC Institution Investigator, the credibility of a victim, suspect, or witness is not a determining factor of the investigative finding. The investigative findings are based on factual evidence and never based on the status of an individual to include staff or inmate. An inmate alleging sexual abuse would never be requested to submit to a polygraph and/or any other truth-telling device.

The review of the 14 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 conducted with three (3) inmates who reported an allegation of sexual abuse acknowledged they were not required to submit to a polygraph or other truth telling device.

115.71(f) TDOC Index #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.

Interviews with the OIC Special Agent and DJRC Investigator indicated a separate investigative report is completed when staff actions or failure to perform their assigned duties are determined to have facilitated and/or contributed to sexual

abuse. The report would include the policy violation identified for submission to Warden.

Documentation of 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. Inmate records are stored in secured cabinets in the records office that are manned by assigned staff and in the unit management office. PREA investigative case files are stored electronically in the PREA Allegation System (PAS) with restricted staff access by assignment and the issuing of encrypted login accessibility. Working investigative case files are stored securely within the investigator's office accessible only to the assigned investigators. Closed investigative case files are stored securely in the DJRC Associate Warden of Programs/ Facility PREA Coordinator's office. Criminal investigative case files are maintained in the office of the OIC Special Agents. The inmate records and case files are accessible only to those staff assigned to the designated areas and or approved by their job description.

115.71(g) TDOC Index #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 and the PREA Allegation System Report confirmed zero sexual abuse and/or sexual harassment investigations were referred for a criminal investigation.

An interview with the OIC Special Agent indicated criminal investigations include all information gathered of the reported occurrence to include the description of all physical evidence, documentary evidence, in addition to recorded interviews with the victim, aggressor, witnesses, photos, phone records, written correspondence, and applicable medical documentation to include forensic medical results, in determining the investigative findings.

15.71 (h) TDOC Index #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 DJRC Investigator, and review of the investigative case files, zero investigations identified possible criminal acts that warranted a criminal investigation.

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 zero.

115.71(i) In accordance with TDOC Index #502.06, investigative records are retained for as long as the alleged abuser is incarcerated or employed by the Department, plus five (5) additional years after the alleged abuser is released from custody or the employee is terminated or separates from the Department. This practice was confirmed by the DJRC Institution Investigator and OIC Special Agent. Administrative investigative case files are maintained in the PREA Allegation System (PAS) at the facility level. Criminal investigations are maintained electronically and at the Office of Investigations and Conduct.

	115.71(j) In accordance with TDOC Index #502.6, 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 Special Agent confirmed although a staff member may resign during an investigation, the investigation would continue to include the arrest and prosecution of staff upon substantiated criminal charges. If the allegation involves a staff member who has resigned, two (2) Special Agents will report to their home if they fail to cooperate by reporting to the facility. The OIC Special Agents have arrest authority throughout the state of Tennessee and will visit the home of a staff member as needed. If the staff member resides outside the state of Tennessee, the assigned OIC Special Agent would request assistance from the law enforcement office within the respective state. Per the OIC Special Agent, if an allegation is reported after an inmate's release from TDOC, (victim or aggressor) the OIC Special Agent would follow through with the assistance from the inmate's probation officer. The investigation would only discontinue due to the identified victim and/or aggressor's death prior to the completion of interview. The review of the investigative case files indicated one (1) staff member resigned after the interview process and prior to the investigation conclusion. However, the investigation remained ongoing throughout the completion. 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 to include those for reported allegations of sexual abuse and sexual harassment. This information was confirmed during interviews with DJRC Warden, TDOC Statewide PREA Coordinator, OIC Special Agent, DJRC Institution Investigator, and DJRC PREA Compliance Manager in addition to the review of the 14 investigative case files. Therefore, provisions (k) and (l) are not applicable. Based on the review of agency policies, investigative case files, staff and inmate interviews and site observation and analysis, the facility does meet the requirements of all standard provisions
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115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.01 Uniform Disciplinary Procedures

	3. TDOC Index #502.06 Prison Rape Elimination Act (PREA (Effective 10/21/2024) 4. PREA Investigative Case Files 5. Interviews with: a. DJRC Institution Investigator b. OIC Special Agent 115.72 (a) Pursuant to TDOC Index #502.06 The Department imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse are substantiated. TDOC Index #502.01, notes preponderance of evidence as the amount of evidence necessary for a party to prevail at a disciplinary hearing. The degree of proof which best accords with reason and probability and is more probable than not. A review of the investigation documents indicates the Department does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse and/or sexual harassment are substantiated for the administrative investigations. Per interviews with the OIC Special Agent and the Institution Investigator, a preponderance of evidence is the standard necessary to substantiate an administrative allegation of sexual abuse or sexual harassment and probable cause is the standard for criminal investigations. Based on the review of agency policies, investigative case file findings that were determined based on the preponderance of the evidence collected, the facility does meet the standard.
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115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/24/2024) 3. PREA Investigative Case Files 4. TDOC PREA Status Notification CR-3984

5. Interviews with:

- a. DJRC Institution Investigator
- b. OIC Special Agent
- c. Warden
- d. Inmates Who Reported Sexual Abuse

115.73 (a) Pursuant to TDOC Index #502.06, 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.

The PAQ identified the number of criminal and/or administrative investigations of inmate sexual abuse allegations completed by the agency/facility in the past 12 months was nine (9). The PAQ also noted of each of the nine (9) inmates were notified, verbally or in writing, of the results of the investigation.

An interview with the DJRC Institution Investigator confirmed members of the SART are appointed by the Associate Warden of Programs/DJRC PREA Coordinator to provide inmates with notification of the investigative findings. The notifications are documented on the TDOC PREA Status Notification CR-3984. Upon a victim's refusal to sign the notification form, their refusal is witnessed by a second SART member. This procedure was reiterated by DJRC Warden.

The OIC Special Agent indicated the assigned OIC Special Agent personally delivers all notifications to the inmates of the investigative finding and status changes to the inmates regarding criminal cases. However, the facility investigator, Associate Warden of Program, and/or other members of SART provide notification to the inmate population at the conclusion of administrative investigations.

Interviews were conducted with three (3) inmates who reported sexual abuse and each acknowledged they were informed of the investigative finding by facility 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. Therefore, this

provision is not applicable.

115.73 (c) Pursuant to TDOC Index #502.0, Following an inmate's allegation that a staff member has committed sexual abuse, the SART informs the inmate of the following, in writing: The staff member is no longer posted within the inmates' 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; The staff member has been convicted on a charge related to sexual abuse within the facility.

The facility reported five (5) staff on inmate sexual abuse allegations were completed as administrative investigations. The review of the investigative cases files and the DJRC PREA Allegation Report confirmed one (1) staff on inmate sexual abuse investigation was concluded as substantiated. The victim acknowledged via their signature of the investigative finding on the Inmate PREA Allegation Status Notification that included the following: "The employee is no longer posted within the inmate's unit; The employee is no longer employed at the facility."

115.73 (d) TDOC Index #502.06. indicates that following an investigation into an inmate's allegation that he or she suffered sexual abuse in a facility, the SART informs the inmate of the following 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.

The review of the investigative case files indicated two (2) inmates on inmate sexual abuse investigations were concluded as substantiated. Each victim acknowledged they were informed of the investigative findings. However, criminal acts were not identified during the investigations.

115.73 (e) In accordance with TDOC Index #502.06, 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, two (2) staff members sign and date while noting the inmates' refusal

The PAQ noted the number of notifications to inmates that were provided pursuant to this standard as nine (9). Eight (8) sexual abuse investigations were randomly selected for review. Seven (7) victims acknowledged their signature on the Inmate PREA Allegation Status Notification, CR-3984 as notification of the investigative findings. One (1) victim's refusal was documented as witnessed by a second staff member.

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.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/24/2024) 3. PREA Investigative Case Files 115.76 (a) (b) (c) (d) TDOC Index #502.06 outlines the mandate of the standard. Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse, sexual harassment, or PREA policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual touching only after conclusion of investigation. Sanctions are proportionate 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, are reported to law enforcement agencies and to any relevant licensing bodies, unless the activity was clearly not criminal in nature. 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 two (2). The number was later identified as one (1). Additionally, the number of those staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies was two (2). The number was correctly identified as one (1). The staff member resigned after the interview process. Criminal activity was not identified, and no further actions were required. The PAQ noted in the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies (other than actually engaging in sexual abuse) was zero. Per the PAQ, In the past 12 months, the number of staff from the facility that have been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies was zero. Based on the review of agency policy, DJRC PAQ, PREA investigative case files, the facility is compliant with all provisions of this standard.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/24/2024) 3. TDOC Index #115.01 Standards for Volunteers and Coordination of Community Involvement (Effective 2/15/2023) 4. PREA Investigative Case Files 5. Documentation of Revoked Checkpoint Entry for Contract Staff 6. Interview with: a. Warden 115.77 (a) (b) TDOC Index #502.06 mandate any contractor or volunteer who engages in sexual abuse is reported to the Office of Investigations and Conduct and to relevant licensing bodies unless the activity was clearly not criminal in nature. Pursuant to TDOC Index #115.01, 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. A copy of the written notification shall be forwarded to the VSC/CSVSC who shall place it in the volunteers' file and make necessary entries in the volunteer database. The approving authority may restrict a volunteer to entering only the assigned TDOC location which shall be designated as the volunteers' primary site. The approving authority may later remove such restrictions thereby allowing the volunteer to enter other TDOC locations, The approving authority may also terminate the services of a volunteer and such termination shall apply to all institutions, unless the Director of Religious and Volunteers Services, and the Assistant Commission of the Rehabilitative Services/Assistant Commissioner of Prison Operations/Assistant Commissioner of Community Supervision determine otherwise. The approving authority shall restrict, postpone, or terminate the services of a volunteer or terminate the services of a volunteer for reasons to include but not limited to the following: Misconduct, harassment, or abuse of inmates, probationers/parolees, or staff, including but not limited to sexual misconduct, harassment, or abuse. Any romantic or sexual relationship with an inmate or probationer/parolee will result in immediate termination of all services provided by the volunteer. Per an interview with the Warden, upon a volunteer and/or contract worker identified as an aggressor in a sexual harassment and/or sexual abuse allegation, their entry into the facility would immediately be revoked, and their entry badge would be

	removed preventing entry into all TDOC properties. Notification is immediately reported to the contracting agency regarding the contractor's denial for entry and a request for replacement is made. The responsibility of notifying the applicable contractor to their licensing body would be that of the contracting agency. The volunteer's badge would be revoked from further entry and notification of the circumstances would be reported to the Central Office. Individuals identified as committing criminal acts would be referred to for criminal prosecution by the assigned OIC Special Agent. The review of the investigative cases confirmed one (1) contractor was identified in a substantiated staff on inmate sexual harassment investigation during the review period. Documentation supports the contractor was immediately denied further entry into the facility as their checkpoint access was revoked. The investigation did not conclude criminal activity. The facility reported zero allegations of sexual abuse and/or sexual harassment alleged against volunteers Based on the review of agency policies, PREA case files, documentation of Revoked Checkpoint Entries for Contractors and Warden's interview, the facility is compliant with all provisions of the standard.
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115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/24/2024) 3. TDOC Inmate Rules and Regulations (Effective August 2023) 4. TDOC Index #502.01 Uniform Disciplinary Procedures (Effective 03/01/2022) 5. TDOC Index #502.05 Definitions of Disciplinary Offenses (Effective 08/16/2023) 6. TDOC Index #502.02 Disciplinary Punishment Guidelines (Effective 09/26/2023) 7. PREA Investigative Case Files 8. Interviews with: a. Warden

b. Behavioral Health Administrator

115.78 (a) TDOC Index #502.06 states, Inmates are 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 TDOC Inmate Rules and Regulations, TDOC Index 502.05, and TDOC Index #502.01 notes the definition and classification of Rape, Sexual Harassment, Sexual Misconduct, Sexual Contact and Attempt as the following:

Attempt: When an accused makes a substantial but unsuccessful effort to committed act. This effort entails more than mere preparation.

Sexual Contact: The intentional touching of a person's intimate parts, or the intentional touching of the clothing covering the immediate area of a person's intimate parts, if the intentional touching can be reasonably construed as being for the purpose of sexual arousal or gratification. This contact would include kissing. cod

Rape (RAP) (Class A); is identified as the act of forcing or coercing (through violence or threats of violence) an individual to submit to sexual intercourse (vaginal or anal) or other ser sexual acts to include cunnilingus and fellatio. The sexual penetration or act is accomplished without the consent of the victim, and the defendant knows or has reason to know at the time of the penetration or sex act that the victim did not consent. It shall also include the sex act of forcibly introducing foreign objects into an individuals' body cavity (vaginal or anal) without the victim's consent

Sexual Harassment (SXH) (Class B or C: Making sexually related comments, gestures, or written communication to another person.

Sexual Misconduct (SXM) Class B or C) as Any sexual conduct between inmates, including those instances where the preponderance of evidence is indicative or preparation for , or immediate conclusion of such acts, including acts involving people, objects, or animals.

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 two (2).

The facility reported in the past 12 months, the number of criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility as zero.

115.78 (b) TDOC Index #502.02, outlines the disciplinary punishment guidelines that notes punishment imposed for the commission of a disciplinary offense shall be related to the seriousness of the offense and administered uniformly and impartially throughout all institution. Corporal punishment is prohibited as a form of punishment.

Pursuant to TDOC Index #502.06, Sanctions are proportionate with the nature and circumstances of the abuse committed, the inmates' disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

The auditing team's review of the investigative case files confirmed two (2) inmates identified as aggressors received disciplinary sanctions for substantiated sexual abuse investigations. Additionally, one (1) inmate received a disciplinary sanction for a substantiated sexual harassment investigative finding.

115.78 (c) Per TDOC Index #502.06 the disciplinary process considers whether an inmate's behavioral disabilities or behavioral illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

The Warden confirmed that an inmate's mental health disability is always given consideration when imposing disciplinary sanctions and input from a mental health practitioner would be included. Additionally, the imposed sanctions are proportionate to the nature and circumstances of the abuses committed, the inmates' disciplinary histories and the sanctions imposed for similar sanctions of other inmates with similar histories.

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 therapy to both the victims and the aggressors. However, inmates are never required to participate in the treatment programs. Group treatment sessions are not offered by the mental health practitioners.

115.78 (e) TDOC Index #502.06 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's review of the investigative case files revealed zero inmates were identified as receiving discipline for sexual conduct with staff upon finding that the staff member did not consent to such contact.

115.78 (f) Pursuant to TDOC Index #502.06, For the purpose of disciplinary action, a report 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 review of the investigative casefiles did not support inmates received discipline due to filing false allegations of sexual abuse and/or sexual harassment.

115.78 (g) TDOC Index #502.06 notes, any prohibition on inmate-on-inmate sexual activity does 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 Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. TDOC Index #113.84 Clinical Assessments, Mental Health Appraisals, and Psychological Testing (Effective 01/15/2021) 4. TDOC Index #113.51 Consent/Refusal of Treatment (Effective 10/15/2022) 5. PREA Mental Health Referrals 6. Documentation of Mental Health Referrals Spreadsheet 7. Risk Screenings 8. Interviews with: a. Staff Who Conduct Risk Screening b. Behavioral Health Administrator c. Inmates Who Disclosed Prior Victimization During PREA Screening 115.81 (a) (b) (c) In accordance with TDOC Index #502.06, Inmates who enter TDOC and are identified as Sexual Aggressor or Sexual Victims on the PREA Screening System Application may be considered for protective custody placement or placement in an institutional setting considered to more controlled than general population. Clinical services are offered to those inmates. Clinical decisions regarding these inmates are the responsibility of the medical and behavioral health staff at the diagnostic center. Any inmate identified as a Sexual Aggressor must be monitored quarterly by the assigned counselor and documented on the offender management system (OMS) screen LIBC for a minimum of one calendar year. These inmates must be re-evaluated at annual reclassification and a new PREA screening to be conducted. 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. TDOC Index #113.51 gives information for refusal of treatment which is when an inmate chooses to refuse an examination, treatment, medication, or procedure, a

licensed health professional must advise the inmate of the potential health consequences of this refusal. The health professional shall have the inmate acknowledge the consequences and the act of refusal by signing the Refusal of Medical Services, CR-1984. The licensed health professional shall sign the CR-1984 as a witness to the refusal. Documentation shall demonstrate that the inmate has been advised of potential health consequences. The health professional shall notify the provider who ordered the treatment and document the refusal and provider notification in the medical record on the Problem Oriented-Progress record, CR-1884.

If an inmate refuses to sign CR-1984, the health care provider shall write "inmate refuses to sign." The form shall be signed by the health care professional and another staff witness.

Per the acceptance of treatment following a refusal the following is noted :(1) inmates shall have the right to accept treatment following a refusal or treatment and (2) in the event an inmate changes his/her mind and decides to accept treatment after refusing, the Consent for Treatment, CR-1897, shall be signed, witnessed and filed in the inmate's health record. This cancels the initial refusal of treatment.

The PAQ indicated that 100% of inmates who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner.

The PAQ indicated that 100% of inmates who have perpetrated sexual abuse, as indicated during the screening, were offered a follow-up meeting with a mental health practitioner.

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-4180.

Per an interview with staff who conduct risk screening, inmates who report and/or are identified as having a prior history of sexual victimization and those identified as having a prior history as sexual aggressor, a mental health referral is automatically submitted via use of an Institutional Health Services Referral, CR-3431 that is forwarded to the mental health department.. The submission of the mental health referral is documented in the Distributed Application during the risk screening. Inmates electing not to attend the initial session are required to notify the assigned mental health practitioner during the scheduled session. Staff indicated the inmates are normally seen within 72 hours to a week of the submitted referrals.

Interviews with two (2) inmates who reported prior sexual abuse during the risk screening confirmed they received an evaluation by a mental health practitioner within 72 hours of their arrival at the facility.

A random selection of 37 inmates who disclosed prior victimization and those who have previously perpetrated sexual abuse as indicated during the risk screenings, confirmed these individuals were noted as receiving a mental health evaluation within 14 days of their arrival. Confirmation was supported by the submission for the

	completed risk screenings in addition to the mental health evaluations. 115.81(d) TDOC Index #502.06 indicates that 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. Risk Screening forms documenting an inmate as victims and aggressors are electronically stored in Distribute Application Program. 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. Medical and mental health files are maintained both in hardcopy files and in addition to they are stored electronically with accessibility to authorized staff within the departments only. Electronically stored records are secured by encrypted logins. 115.81(e) TDOC Index #502.06 states that Medical and Behavioral Health providers obtain informed consent from inmates before reporting about prior sexual victimization that did not occur in the institutional setting. Per interviews with both medical and mental health practitioners indicated all inmates are required to sign a consent form during the intake process at their initial assessment and are reminded of staff's obligation to report during continued services. Those on the mental health caseload sign a consent form annually. The facility has not housed individuals under the age of 18 in numerous years, therefore a consent form for such was applicable. However, staff acknowledged their obligation as a TDOC employee in addition to their professional license and the Tennessee law, that they are mandated to report all allegations of sexual abuse immediately. Based on a review of agency policies, mental health referral logs, site observation, confirmation of secure electronic storage, secure storage areas, and timely completion of submitted mental health referrals, interviews and analysis, the facility is compliant with all provisions of the standard.
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ)

2. TDOC Index #502.06 Prison Rape Elimination Act (Effective 10/21/2024)

3. TDOC Index #113.30 Access to Health Care (Effective 02/02/2022)

4. TDOC Index #113.51 Consent/Refusal of Treatment (Effective 10/15/2022)

5. TDOC Index # 113.42 Communicable Disease (Effective 01/18/2024)

6. TDOC Index # 113.15 Inmate Co-Payment for Health Services (Effective 10/15/2022)

7. Interviews with:

a. Health Services Administrator

b. Behavior Health Administrator

c. Security and Non-Security First Responders

d. Inmates Who Reported Sexual Abuse

115.82 (a) TDOC Index #502.06 outlines the mandate of the standard provision. Medical and mental health services are provided to victims of sexual abuse or sexual harassment to the extent allowable and not in direct conflict with the PREA Act of 2003.

Victims of sexual abuse must receive timely, unimpeded access to emergency medical treatment and crisis interventions services, the nature and scope of which are determined by medical and behavior 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. The Health Administrator shall generate institutional written procedures to ensure that routine and emergency health care services are accessible to all inmates in a timely manner.

Pursuant to TDOC Index #113.51, When an inmate chooses to refuse an examination, treatment, medication, or procedure, a licensed health professional must advise the inmate of the potential health consequences of the refusal. The health professional shall have the inmate acknowledge the consequences of the refusal by signing the Refusal of Medical Services, CR-1984. If the inmate refuses to sign, the form shall be signed by the health care professional and another staff witness. In the event the inmate changes his/her mind and decides to accept treatment after refusing, the Consent for Treatment, CR-1897, shall be signed, witnessed and filed in the inmates' health record.

Per the Health Services Administrator, medical nursing staff are scheduled 24/7 and victims of sexual abuse receive timely, unimpeded access to emergency medical treatment. Medical staff have a mandatory response time of four minutes or less,

however, medical staff always respond immediately. Upon an inmate report of sexual abuse, medical staff follow the operational protocols regarding evidence preservation as applicable and make a determination of whether the inmate would require transport to the Nashville General Hospital for a forensic medical examination. Upon a victim's return to the facility, medical staff would follow the recommendations made by the SANE/SAFE and/or the attending qualified medical practitioner and continued medical services would be based heavily on the scope of medical staff's professional judgment and state and federal laws.

An interview with the Behavioral Health Administrator indicated as soon as possible to include immediately inmates who report sexual abuse receive timely and impeded access to emergency crisis intervention services upon the completion of a medical assessment. Mental health practitioners are scheduled on-call duty outside their normal duty hours and would report to the facility as needed and/or the victim would be evaluated the following scheduled workday depending on the victim's circumstances. The scope of services provided begins with TDOC policies. When determining treatment services to the inmates, mental health staff build from the established TDOC policies in addition to their professional judgement, and in accordance with state and local laws.

Documentation of both medical and mental health services for inmates who reported sexual abuse was selected for review. Confirmation of completed medical assessments was noted as completed on the day of the reported sexual abuse. Mental health assessments were noted as completed on the day of the reported allegation and/or not later than three days of reporting.

The facility reported nine (9) sexual abuse allegations during the review period. The identified acts of sexual abuse did not exceed unwanted touching and/or the act of voyeurism. Therefore, sexual penetration was not identified, and the completion of a forensic medical examination was not applicable.

Interviews were conducted with three (3) inmates who reported sexual abuse, each indicated they were evaluated by a medical practitioner within minutes of reporting the sexual abuse. Each also noted their report of sexual abuse did not include sexual penetration nor did they receive injuries, however they were assessed by a medical practitioner within minutes of reporting. Two (2) victims acknowledged meetings with a mental health practitioner on the day of the reported sexual abuse and one (1) stated they met with a mental health practitioner the following day within 24 hours. All acknowledged they were previously assigned to the mental health case load, and each continues with regular scheduled services.

Per an interview with the Associate Warden of Programs/Facility PREA Coordinator, the facility has an inmate population of less than 700 and an excess of 500 inmates are assigned on the mental health caseload.

115.82 (b) In accordance with TDOC Index #502.06, If no qualified medical or behavioral health providers are on duty at the time a report of recent abuse is made, correctional officers are trained to render first aid as needed. Once the victim is safe and the scene is secure, if medical attention is deemed necessary for stabilization,

the security shift supervisor notifies the medical member of SART or the designee.

Medical staff are scheduled 24/7 to provide medical services. However, the Shift Commander is required to complete 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.

Per an interview with a security first responder, the victim and the aggressor had previously separated prior to the victim reporting the allegation. The victim remained with the staff member, and the Shift Commander was immediately notified. The reported sexual abuse did not warrant the preservation and/or collection of evidence.

An interview with a non-security staff first responder stated the victim was in their office away from the alleged aggressor upon reporting. The Shift Commander was immediately notified, and the victim remained in their office pending the arrival of the Shift Commander. Additionally, the reported sexual abuse did not warrant the preservation and/or collection of evidence.

115.82 (c) TDOC Index #502.06 indicates victims of sexual abuse while incarcerated, are offered tests for sexually transmitted infections and sexually transmitted infections prophylaxis in accordance with professionally accepted standards of care and as medically appropriate.

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.

Interviews were conducted with three (3) inmates who reported sexual abuse. Zero inmates interviewed reported sexual abuse in nature that required testing for emergency medical treatment and/or testing for sexually transmitted infections prophylaxis.

The review of the sexual abuse investigative case files also confirmed testing for sexually transmitted infections and sexually transmitted infections prophylaxis was not applicable as no sexual penetration and/or an exchange of bodily fluids were identified.

Per an interview with the Health Services Administrator, the inmate population would immediately be provided timely information about access to emergency contraception and sexually transmitted infection prophylaxis testing for sexually transmitted infections to include HIV, STD and Hepatitis in addition to follow up testing through lab work and medication as needed. Information provided by SANE during a forensic examination would be documented in the medical records and the DJRC medical staff would continue with the recommended services A pregnancy test would be initiated as applicable to include follow-up testing and an additional

	treatment plan. The facility has an OBGYN on-site and is available to provide services as needed. Although inmates have arrived at the facility during their pregnancy, zero pregnancies have been identified as occurring during an inmate's assignment at the facility. 115.82(d) TDOC Index #113.15 notes non-chargeable services that includes but not limited to sexual assault examination, including mental health services necessary to treat the offender. The review of the investigative case files indicated zero inmates received a sexual assault examination and/or other medical and/or mental health services in which they incurred a financial responsibility. Based on the review of agency policies, investigative case files, documentation of medical and mental health services provided, interviews with inmates who reported sexual abuse, medical and mental health administrators, security and non-security first responders, DJRC does meet all provisions of the standard.
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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
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. TDOC Index #113.30 Access To Health Care (Effective 02/01/2022) 4. TDOC Index #133.51 Consent/Refusal of Treatment (Effective 10/15/2022) 5. TDOC Index #113.15 Inmate Co-Payment For Health Services (Effective 01/01/2020) 6. TDOC Index #113.42 Communicable Diseases (Effective 01/18/2024) 7. Medical/Mental Health Logs 8. Interviews with: a. Health Services Administrator b. Behavioral Health Administrator

c. Inmates who reported sexual abuse

115.83 (a) TDOC Index #502.06 outlines the mandate of the standard provision. Medical and mental health services are provided to victims of sexual abuse or sexual harassment to the extent allowable and not in direct conflict with the PREA Act of 2003. 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.

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.

Pursuant to TDOC Index #113.51, When an inmate chooses to refuse an examination, treatment, medication, or procedure, a licensed health professional must advise the inmate of the potential health consequences of the refusal. The health professional shall have the inmate acknowledge the consequences of the refusal by signing the Refusal of Medical Services, CR-1984. If the inmate refuses to sign, the form shall be signed by the health care professional and another staff witness. In the event the inmate changes his/her mind and decides to accept treatment after refusing, the Consent for Treatment, CR-1897, shall be signed, witnessed and filed in the inmates' health record.

Documentation of both medical and mental health services for inmates who reported sexual abuse was selected for review. Confirmation of completed medical assessments was noted as completed on the day of the reported sexual abuse. Mental health assessments were noted as completed on the day of the reported allegation and/or not later than three days of reporting.

The facility reported nine (9) sexual abuse allegations during the review period. The identified acts of sexual abuse did not exceed unwanted touching and/or the act of voyeurism. Therefore, sexual penetration was not identified, and the completion of a forensic medical examination was not applicable.

Interviews were conducted with three (3) inmates who reported sexual abuse, each indicated they were evaluated by a medical practitioner within minutes of reporting the sexual abuse. Each also noted their report of sexual abuse did not include sexual penetration nor did they receive injuries, however they were assessed by a medical practitioner within minutes of reporting. Two (2) victims acknowledged meetings with a mental health practitioner on the day of the reported sexual abuse and one (1) stated they met with a mental health practitioner the following day within 24 hours. All acknowledged they were previously assigned to the mental health case load, and each continues with regular scheduled services.

115.83 (b) TDOC Index #502.6 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 and medical practitioners, victims of sexual abuse would be offered follow-up services to include those victims who transfer to other TDOC facilities. Case Managers within each department arrange for continued treatment services within an inmate's release area for appropriate follow-up treatment upon an inmates' departure into their local community. The inmates are normally scheduled to be seen within 24 hours of their release from TDOC custody.

Interviews with three (3) inmates who reported sexual abuse indicated each were assigned to the mental health caseload prior to the reported allegations and continued to receive mental health services regularly.

The review of the investigative case files revealed zero reported sexual abuse allegations met the criterion for medical follow-up services, treatment plans and or referral for continued care following their transfer to, or placement in, other facilities or their release from custody. Inmates who reported sexual abuse were currently on the mental health case load prior to reporting sexual abuse and continued their prearranged services.

Per an interview with the Associate Warden of Programs/Facility PREA Coordinator, the facility maintains an inmate population of less than 700 and an excess of 500 inmates are assigned on the mental health caseload.

115.83 (c) TDOC Index #502.6 indicates the facility provides victims with medical and behavioral health services consistent with the community level of care.

Interviews with medical and mental health practitioners confirmed 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) Pursuant with TDOC Index #502.6, Victims 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.

The review of the investigative case files indicated zero investigations included vaginal penetration.

Per an interview with the Health Services Administrator, abortions are banned in the state of TN., and the only exception would be to save the life of the mother.

Therefore, the agency is required to follow the state law and there are no exceptions to include for acts of rape. However, such victims would be offered pregnancy tests and continued medical treatment would be provided as needed.

115.83 (f). Pursuant to TDOC Index #502.06, Victims of sexual abuse while incarcerated, are offered tests for sexually transmitted infections and sexually transmitted infections prophylaxis in accordance with professionally accepted

standards of care and as medically appropriate.

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).

The review of the investigative case files confirmed zero allegations of sexual abuse were applicable for the offering of tests for sexually transmitted infections and sexually transmitted infections prophylaxis as there were zero reported allegations that included vaginal penetration and/or an exchange of bodily fluids.

115.83 (g) TDOC Index #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 investigations.

TDOC Index #113.15 notes non-chargeable services that includes but not limited to sexual assault examination, including mental health services necessary to treat the offender.

Per the medical and mental health practitioners, victims of sexual abuse are not responsible for the financial cost of treatment services.

Interviews with three (3) victims of sexual abuse indicated at no time where they requested to submit payment for the medical and or mental health services received

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

Inmates who enter the TDOC as sex offenders or inmates identified as Sexual Aggressors are advised of the sex offender treatment/programming eligibility requirements by the counseling or behavior al health staff involved in the diagnostic and classification process. Those eligibility criteria must be met to be able to enter the program.

Per the Behavior Health Administrator, the facility does not offer a sexual abuse program, however individual therapy sessions are available.

Two (2) inmates on inmate sexual abuse investigation were concluded as substantiated (touching only). The aggressors were identified as having a mental

	health disability and noted as regular clients on the mental health case load. Based on the review of policies, investigative case files, medical and mental health documentation, interviews with inmates who report sexual abuse, mental health and medical practitioners, and analysis, the facility is compliant with all provisions of this standard.
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2 TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. DJRC Sexual Abuse Incident Review Summaries 4. Interviews with: a. Warden b. DJRC PREA Compliance Manager c. Incident Review Team Member 115.86 (a) (b) TDOC Index #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 review occurs within 30 days of the conclusion of the investigation. The PAQ noted six (6) criminal and/or administrative investigations of alleged sexual abuse completed during the 12-month review period that were followed by a sexual abuse incident review within 30 days, excluding only unfounded incidents. The sexual abuse investigations are identified as the following: One (1) staff on inmate and two (2) inmates on inmate substantiated sexual abuse investigations; One (1) inmate on inmate and two (2) staff on inmate sexual abuse investigations were concluded as unsubstantiated. Each of the incident reviews were completed not to exceed 30 days after the investigative conclusions. 115. 86 (c) Pursuant to TDOC Index #502.06, The review team includes the Warden/ Superintendent/designee, the Facility PREA Coordinator facility and institutional investigator(s), line supervisor(s), and medical/mental health professionals

The review of the six (6) incident reviews confirmed all were documented as completed by members of the Sexual Assault Response Team (SART) that included to the following positions: DJRC PREA Compliance Manager, DJRC Institution Investigator; Mental Health Professional; Medical Professional, and Associate Warden Programs/ DJRC PREA Coordinator.

Per an interview with DJRC Warden, various members of the Sexual Assault Response Team (SART) to include but not limited to himself or designee, Associate Warden Programs/DJRC PREA Coordinator, DJRC PREA Compliance Manager, DJRC Institution Investigator; Mental Health Professional; Medical Professional; line staff supervisors.

115.86 (d) TDOC Index #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) Examine the area within the facility or facility grounds where the incident allegedly occurred to assess whether in the area may enable abuse; c) Assess the adequacy of staffing levels in that area during different shifts; d) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; e) 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 review of the six (6) incident reviews confirmed that SART members documented detailed assessments and review of the following elements: Whether the allegations or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; Whether monitoring technology should be deployed or augmented to supplement supervision by staff; The review team has examined the area in the facility where the allegedly occurred to assess whether physical barriers in the area may have enabled abuse; The review team has assessed the adequacy of staffing level in the area during different shifts.

Per the DJRC PREA Compliance Manager, as a member of SART, they serve as a member of the incident review team and attend the monthly meetings while providing input. Recommendations are made by members of the SART during the review.

Per an interview with member of SART who serves as a member of the Incident Review Team. The investigative case is presented by the Associate Warden of Programs/ Facility PREA Coordinator in which SART members discuss the circumstances of occurrences. The meetings are scheduled within 30 days of the investigative findings. SART members conduct a walkthrough of the area where the sexual abuse was reported to have occurred. SART members review and discuss 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, inaccurate staffing level, and/or a need for change in policy or procedures, in addition to whether there is a need for additional staff training. Recommendations for change are made based on the review. A combination mirrors and cameras have been installed based on the recommendations made by SART and

	approved by the Warden. The DJRC Warden indicated the purpose of the incident reviews is to identify the need for changes that would eliminate risk while improving inmate and staff safety. SART members identify any areas that can be improved in the prevention and/or detection of sexual abuse allegations while identifying corrective measures for his review and approval as applicable. 115.86 (e) Per TDOC Index #502.06 The facility implements recommendations for improvement or documents that reason for not doing so. A copy of the incident review is scanned and electronically forwarded to the TDOC Statewide PREA Coordinator. Based on the review of the agency's policy, incident reviews, interviews and analysis, the facility is compliant with all provisions of this standard.
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Evidence Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOC Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10/21/2024) 3. Agency's Survey of Sexual Victimization (SSV) Reports 2022- 2024 4. Interview: a. TDOC Statewide PREA Coordinator 115.87(a) (b) (c) (d) (e) (f) TDOC Index #502.06 outlines the mandate of the standard provisions. Staff collect accurate uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. TDOC aggregates the incident-based sexual abuse data at least annually. The report is prepared by the TDOC Statewide PREA Coordinator utilizing the Department of Justice annual reporting format. TDOC maintains, reviews, and collects dates as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Per an interview with the TDOC Statewide PREA Coordinator, the 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

	TDOD Index #502.06. Documentation of the agency's completed Survey of Sexual Victimization (SSV) reports for the following years 2022, 2023 and 2024 were submitted for review. The data collected by the facility is sufficient to answer all questions on the survey conducted by the Department of Justice Survey of Sexual Violence. The SSV-2 reports also included incident-based and aggregated data from each of the four (4) private contracted facilities. Based on the review of policies, annual SSV Reports, agency's website, interview 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 Reviewed (documents, interviews, site review): 1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ) 2. TDOD Index #502.06 Prison Rape Elimination Act (PREA) (Effective 10-21-2024) 3. TDOD Agency Website 4. Annual PREA Reports 5. Interviews with: a. TDOD Statewide PREA Coordinator b. Agency Head Designee c. DJRC PREA Compliance Manager 115.88 (a) (b) (c) (d) The TDOD Index #502.06 policy addresses the requirement of this standard. The TDOD Statewide PREA Coordinator reviews data collected and aggregated in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training including; a)) Identifying problem areas; b) Taking corrective actions on an ongoing basis; c) Preparing an annual report of its findings and corrective action for TDOD. This report includes a comparison of the current year's data and corrective actions with those from the prior year and provides an assessment of TDOD's progress in addressing sexual abuse. This report is approved by the Commissioner and made readily available to the public through the Department s' website. 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 etc.). Additionally, 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 staff conduct for victims and staff reporters was born out of trends observed. The Annual PREA Report is prepared by the 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. Per the DJRC 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. However, their role as the facility's temporary assigned PREA Compliance Manager has been to provide assistance to the DJRC PREA Coordinator. TDOC Statewide PREA Coordinator confirmed the agency review 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 to include training for staff and investigators as part of corrective actions measures. She has access to the PREA Allegation System (PAS) that allows her to generate reports for specific facilities to include those that are contracted with the agency. The PAS provided numbers and no personal data information is included. The agency completes an annual report that is reviewed by the Inspector General prior to publishing on the agency's website accessible for viewing by the public. The agency's Annual Reports do not contain sensitive information that needs to be redacted, as confidential information is excluded from entry into the reports. The auditing team reviewed the agency's website at https://www.tn.gov/correction/-state-prisons/prison-rape-elimination-act.html and confirmed the TDOC Annual PREA Reports for FY2024 - FY2025 were published and made available to the public. The Annual PREA Report included a comparison of each fiscal year and did not provide information that would present a clear and specific threat to the safety and security of the facility. Based on a review of policy, website, TDOC Annual Report, interviews and analysis, the agency is compliant with all provisions of this standard.
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence Reviewed (documents, interviews, site observation)

1. Debra K. Johnson Rehabilitation Center (DJRC) Completed Pre-Audit Questionnaire (PAQ)

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

3. TDOC agency's website

4. Interview with:

a. TDOC Statewide PREA Coordinator

115.89 (a) (b) (c) (d) The TDOC Index #502.06 policy governs the mandate of the standard provisions. The TDOC Statewide PREA Coordinator ensures that the data collected is securely retained. TDOC makes 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. Personal identifiers are removed prior to the data being made publicly available. The TDOC State PREA Coordinator maintains sexual abuse data collected for at least ten years after the date of the initial collection unless federal, state or local law requires otherwise. PREA audit documentation is retained for 12 months following the deadline for any facility audit appeal. A longer document retention period may be request by the U.S. Department of Justice through the TDOC Statewide PREA Coordinator.

Per an interview with the TDOC Statewide PREA Coordinator, data is securely maintained for at least 10 years in a computerized system that is accessible to limited authorized staff to include the upper-level management staff such as the Deputy Inspector General.

The auditing team reviewed the TDOC website at <https://www.tn.gov/correction/sp/prison--rape-elimination-act.html> and confirmed the publishing of the most current Annual PREA Report FY2024 – FY2025 with viewing accessibility to the public that excluded personal identifiers.

The following Annual PREA Reports were requested for confirmation of retention and the inclusion of comparison of the previous and current year data: FY 2015 – FY 2016; FY 2017- FY 2018; FY 2019 -FY 2020; FY 2020 – FY 2021; FY2021 – FY 2022; FY 2022 – FY 2023; FY 2023 - FY 2024.

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. Completed administrative PREA investigative case files are secured stored in the facility's Associate Warden/ PREA Coordinator's Office. Active administrative case files are stored in the facility's investigator's office. Criminal investigative casefiles are maintained off site in the office of the OIC. All hardcopy files are secured in file cabinets within the designated staff's office areas, with key entry accessibility limited to those assigned. Inmate medical and mental health files are maintained electronically with password protection in addition to paper files are securely stored with limited staff accessibility. The inmate risk screening documentation is only stored

	electronically and is accessible to designated staff based on their official position. All electronically stored data is password protected. Inmate individual files are secured in the record office that is manned by designated record office clerks. Based on the review of TDOC policy, agency's website, site observation and staff interview, the TDOC agency and facility is compliant with all provisions of this standard.
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	401. (a) (b) The auditing team reviewed of TDOC website at https://www.tn.gov/c-orrection/state-prisons/prison-rape-elimination-act.html that noted Final PREA audit reports are available with the National PREA Resource Center. The review of the website https://www.prearesourcecenter.org/audit/directory 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 audited each one period throughout the fourth cycle. This is the first year of the fifth audit cycle. 401. (h) The auditing team was provided with full access to all buildings, housing units and areas throughout the properties of DJRC during the site observation. Areas observed included but were not limited to entrance areas, all inmate housing units at main site and Transition Center, food service areas, warehouse, administration, medical, mental health, intake, visitation, maintenance, medical, mental health, inmate program areas, religious services, TRICOR, and observation of intake process that included risk screening and PREA orientation. 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 for background investigation, policies, training records, investigative case files, medical and mental health documentation, housing assignment, inmate risk screening, education, and additional documents. 401.(m) The auditing team was provided with individual office space to conduct inmate and staff interviews within private settings. 401. (n) The PREA Audit Notice was provided to the facility by the Lead Auditor and noted as posted on January 29, 2026, an excess of six weeks prior to the site observation. The PREA Audit Notice was observed posted throughout DJRC in the front entrance, all inmate housing units, administration, medical, mental health, intake, program areas, operations area, warehouse, maintenance, food service, accessible for viewing by staff, contractors, volunteers, visitors and inmate population on the designated PREA Informational Boards posted on bright yellow

	flyers that was easily identified by the observers to include in large font (size 18) and within the Spanish and English languages. Interviews with staff to include contractors and volunteers and the inmate population, acknowledged observance and awareness of the postings. An interview with staff assigned to the mailroom confirmed the inmate's outgoing mail is sealed by the inmates unless identified for monitoring due to security concerns per the Warden. Outgoing mail addressed to the PREA Auditor would be stamped and treated as confidential mail and as legal mail. Inmates designated at DJRC are issued tablets and have access to communicate verbally and through written correspondence to family and friends and the facility to report sexual abuse. All inmates have access to phones, paper, writing instruments, and mailboxes to communicate with outside resources. The auditing team did not receive any request from the inmate population, staff, volunteers, or contractors to participate in the interview process.
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	A review of the TDOC's website at www.tn.gov/correction/sp/prisonrape-elimination-act.html notes the following "Final PREA audit reports are available with the National PREA Resource Center." The auditing team's review of the National PREA Resource Center's website at https://www.prearesourcecenter.org/audit/directory indicated the directory allows the public search for and review the status of all upcoming, ongoing, and complete PREA audits initiated on or after June 30, 2022.

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

	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).)	yes
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).)	yes
	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).)	yes
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).)	yes
	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).)	yes
	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).)	yes
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	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.15 (f)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes

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

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

	U.S.C. 1997)?	
	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,	yes

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

	inmates on how to avoid inappropriate relationships with inmates?	
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with 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	yes

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

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

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

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 screening instrument?	yes
115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes

	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following 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
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	

	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of	yes

	being sexually abusive, to inform: Work Assignments?	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: 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	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (d)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (e)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (f)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (g)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.43 (a)	Protective Custody	

	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b) Protective Custody		
	Do inmates who are placed in segregated housing because they 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 anonymous upon request?	yes
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials	na

	and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	
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.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency	yes

	is exempt from this standard.)	
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, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between	yes

	inmates and these organizations and agencies, in as confidential a manner as possible?	
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 abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a	yes

	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?	
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 response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities	yes

	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?	
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 sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report	yes

	of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
	Does the agency conduct such investigations for all allegations,	yes

	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).)	
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	na

	order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	
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 abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes

115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who 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 evidence sufficient to substantiate the allegation?	yes
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does	yes

	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.)	
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	na
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	Access to emergency medical and mental health services	

	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes

115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	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	yes

	has been determined to be unfounded?	
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	

	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, 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 to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	Data review for corrective action	

	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted 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	Frequency and scope of audits	

(b)		
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse	yes

	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.)	
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