

PREA Facility Audit Report: Final

Name of Facility: Charles E. 'Bill' Johnson Correctional Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 12/09/2025

Auditor Certification

The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Elaine Bridschge	Date of Signature: 12/09/2025

AUDITOR INFORMATION

Auditor name:	Bridschge, Elaine
Email:	risingsunauditing@gmail.com
Start Date of On-Site Audit:	11/05/2025
End Date of On-Site Audit:	11/06/2025

FACILITY INFORMATION

Facility name:	Charles E. 'Bill' Johnson Correctional Center
Facility physical address:	1856 East Flynn Street , Alva, Oklahoma - 73717
Facility mailing address:	

Primary Contact

Name:	Becky Guffy
Email Address:	Becky.Guffy@doc.ok.gov
Telephone Number:	580-327-8000

Warden/Jail Administrator/Sheriff/Director

Name:	Becky Guffy
Email Address:	Becky.Guffy@doc.ok.gov
Telephone Number:	580-327-8000

Facility PREA Compliance Manager

Name:	Scotty Cox
Email Address:	scotty.cox@doc.ok.gov
Telephone Number:	580-327-8000

Facility Characteristics

Designed facility capacity:	601
Current population of facility:	555
Average daily population for the past 12 months:	558
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Men/boys
Age range of population:	18-65
Facility security levels/inmate custody levels:	Minimum
Does the facility hold youthful inmates?	No

Number of staff currently employed at the facility who may have contact with inmates:	91
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	8
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	71

AGENCY INFORMATION	
Name of agency:	Oklahoma Department of Corrections
Governing authority or parent agency (if applicable):	
Physical Address:	4345 North Lincoln Boulevard, Oklahoma City, Oklahoma - 73105
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Miciah Ahrnsbrak	Email Address:	miciah.ahrnsbrak@doc.ok.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:

22

- 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
- 115.13 - Supervision and monitoring
- 115.15 - Limits to cross-gender viewing and searches
- 115.16 - Inmates with disabilities and inmates who are limited English proficient
- 115.17 - Hiring and promotion decisions
- 115.21 - Evidence protocol and forensic medical examinations
- 115.22 - Policies to ensure referrals of allegations for investigations
- 115.31 - Employee training
- 115.32 - Volunteer and contractor training
- 115.33 - Inmate education
- 115.34 - Specialized training: Investigations
- 115.35 - Specialized training: Medical and mental health care
- 115.41 - Screening for risk of victimization and abusiveness
- 115.51 - Inmate reporting

- | | |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none">• 115.53 - Inmate access to outside confidential support services• 115.54 - Third-party reporting• 115.64 - Staff first responder duties• 115.65 - Coordinated response• 115.67 - Agency protection against retaliation• 115.71 - Criminal and administrative agency investigations• 115.82 - Access to emergency medical and mental health services• 115.86 - Sexual abuse incident reviews |
| Number of standards met: | 23 |
| 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:	2025-11-05
2. End date of the onsite portion of the audit:	2025-11-06

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Northwest Domestic Crisis Services

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	601
15. Average daily population for the past 12 months:	558
16. Number of inmate/resident/detainee housing units:	3
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

23. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	544
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:	2
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:	7
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:	0
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:	0
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:	8

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:	0
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:	1
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:	1
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):	No text provided.
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:	117
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:	71

<p>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:</p>	<p>9</p>
<p>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:</p>	<p>No text provided.</p>
<h2>INTERVIEWS</h2>	
<h3>Inmate/Resident/Detainee Interviews</h3>	
<h4>Random Inmate/Resident/Detainee Interviews</h4>	
<p>40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>22</p>
<p>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Age</p> <p><input checked="" type="checkbox"/> Race</p> <p><input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input checked="" type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Through a review of data collection worksheets, site observations, unit rosters and conversations with staff and inmates.</p>
<p>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>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):</p>	<p>No text provided.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>8</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p>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:</p>	<p>2</p>
<p>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:</p>	<p>2</p>
<p>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:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a review of data collection worksheets, site observations, unit rosters and conversations with staff and inmates.</p>
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a review of data collection worksheets, site observations, unit rosters and conversations with staff and inmates.</p>
<p>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:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a review of data collection worksheets, site observations, unit rosters and conversations with staff and inmates.</p>
<p>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:</p>	<p>2</p>
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a review of data collection worksheets, site observations, unit rosters and conversations with staff and inmates.</p>

<p>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:</p>	<p>1</p>
<p>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:</p>	<p>1</p>
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a review of data collection worksheets, site observations, unit rosters and conversations with staff and inmates.</p>
<p>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

58. Enter the total number of RANDOM STAFF who were interviewed:	12
59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input checked="" type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input checked="" type="checkbox"/> Rank (or equivalent) <input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
If "Other," describe:	Gender
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> 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):	11

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

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

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

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

71. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> 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)?	<input checked="" type="radio"/> Yes <input type="radio"/> 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)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
75. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p>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).</p>	<p>No text provided.</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------

Documentation Sampling

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

<p>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?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>No text provided.</p>

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	0	0	0	0
Staff-on-inmate sexual abuse	1	1	0	0
Total	1	1	0	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	1	0	1	0
Staff-on-inmate sexual harassment	1	0	1	0
Total	2	0	2	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	0	0	0
Staff-on-inmate sexual abuse	0	0	1	0
Total	0	0	1	0

Sexual Harassment Investigation Outcomes

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

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	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

1

<p>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Inmate-on-inmate sexual abuse investigation files

<p>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>

Staff-on-inmate sexual abuse investigation files

<p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Sexual Harassment Investigation Files Selected for Review

<p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>a. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>The facility has not received any reported sexual harassment allegations reported in the last 12 months.</p>
<p>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>

Inmate-on-inmate sexual harassment investigation files

<p>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<p>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>No text provided.</p>

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

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

Identify the name of the third-party auditing entity

Corrections Consulting Services LLC

Standards

Auditor Overall Determination Definitions

- Exceeds Standard
(Substantially exceeds requirement of standard)
- Meets Standard
(substantial compliance; complies in all material ways with the standard 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: Exceeds Standard
	Auditor Discussion 115.11 Zero Tolerance of Sexual Abuse and Sexual Harassment; PREA Coordinator Evidence Analyzed: <ol style="list-style-type: none">1. Facility Operations Policy 0306012. PREA Reporting Procedure Checklist3. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act4. Facility Organizational Chart5. General Council Organizational Chart6. Pre-Audit Questionnaire (PAQ)7. PREA Coordinated Response Plan

8. Interviews with PREA Coordinator and PREA Compliance Manager

Findings:

A) The facility upholds an outstanding zero-tolerance policy for all forms of sexual abuse and sexual harassment. This policy clearly defines what constitutes sexual abuse, sexual harassment, and staff misconduct, and establishes comprehensive procedures to prevent, detect, and respond to any such incidents. In line with ODOC's standards, the facility firmly enforces this policy in all instances of inmate-on-inmate sexual assault, staff-on-inmate misconduct, and any form of harassment toward inmates. Every report of sexual assault, abuse, misconduct, or harassment is immediately and thoroughly investigated to ensure accountability and resident safety. To promote awareness and transparency, PREA informational posters are prominently displayed throughout the facility in areas visible to staff, inmates, and visitors, reinforcing the facility's exceptional commitment to safety and respect.

B) A PREA Coordinator has been assigned at the agency level. This person is in a leadership role and has the authority and time needed to make sure the agency is meeting PREA requirements. This position reports to the agency General Counsel. Exceeding the standard, the Oklahoma Department of Corrections maintains one PREA Coordinator whose only job is PREA compliance. The position is two positions below the Agency Director. The Agency also has created a position within the last year, Project Manager, whose primary job duties also revolve around PREA Compliance, and can serve as an Acting PREA Coordinator if the PREA Coordinator is unavailable.

C) The facility has a dedicated PREA Compliance Manager (PCM) responsible for overseeing on-site PREA efforts. This role is fully supported and allocated the necessary time to ensure compliance. At BJCC (Charles E. "Bill" Johnson Correctional Center), the deputy warden serves as the designated PCM, with the warden acting as the alternate PCM when the deputy warden is unavailable.

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.12 Contracting with Other Entities for the Confinement of Inmates Evidence Analyzed 1. Pre-Audit Questionnaire (PAQ) 2. Interview with agency contract administrator
	Findings:

115.12 Contracting with Other Entities for the Confinement of Inmates Evidence Analyzed

1. Pre-Audit Questionnaire (PAQ)

2. Interview with agency contract administrator

Findings:

- | | |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>A) The agency does not contract for housing offenders.</p> <p>B) The facility has confirmed that it has not entered into any such contracts.</p> |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------|

115.13	Supervision and monitoring
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>115.13 Supervision and Monitoring</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. 2025 Staffing Plan 2. 2024 Staffing Plan 3. Photos of Logs of Supervisor Unannounced Rounds 4. Photos of logs of Administrator Unannounced Rounds 5. Pre-Audit Questionnaire (PAQ) 6. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 7. Facility Operations Policy 030601 8. Site Review: Supervision Practices 9. Interviews with the Warden, PREA Compliance Manager, PREA Coordinator and staff that conduct unannounced rounds <p>Finding:</p> <p>A) The facility demonstrates excellence in maintaining safety and accountability through a comprehensive and well-designed staffing plan. This plan ensures adequate supervision, optimal camera coverage, and consistent staff presence throughout all areas of the facility to protect residents and staff from sexual abuse. Staff have been issued body cameras to assist with keeping staff and inmates safe. The staffing plan was carefully developed using a detailed review of key factors, including:</p> <ol style="list-style-type: none"> (1) Generally accepted juvenile detention and correctional/secure residential practices. (2) Any judicial findings of inadequacy. (3) Any findings of inadequacy from Federal investigative agencies. (4) Any findings of inadequacy from internal or external oversight bodies. (5) All components of the facility's physical plant (including "blind spots" or areas where staff or residents may be isolated).

- (6) The composition of the resident population.
- (7) The number and placement of supervisory staff.
- (8) Institution programs occurring on a particular shift.
- (9) Any applicable State or local laws, regulations, or standards.
- (10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- (11) Any other relevant factors.
- B) The facility maintains compliance with the staffing plan, with deviations occurring only in rarely exigent circumstances. All deviations are thoroughly documented, including justification and any mitigation measures taken.
- C) Staffing plans are reviewed annually, and any updates needed are documented. Reviews are conducted collaboratively to maintain PREA compliance.
- D) The warden, deputy warden, chief of security and shift supervisors conduct and document unannounced rounds in the unit logs as well as on the "Administrative Staff/Weekly Visit to Facility Living Area and Activity Areas Checklist". These rounds are documented in shift logs. Staff are prohibited from alerting other staff members that these supervisory rounds are occurring unless such announcement is related to the legitimate operational functions of the facility.

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.14 Youthful Inmates
	<p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. Pre-Audit Questionnaire (PAQ) 2. Site Review: Supervision Practices <p>Findings:</p> <p>A) B) C) The facility does not house youthful offenders.</p>

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

115.15 Limits to Cross-Gender Viewing and Searches

Evidence Analyzed:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
2. Facility Operations Policy 030601
3. Pre-Audit Questionnaire (PAQ)
4. OP-040102 Security
5. OP-040110 Security
6. Staff Cross Gender Training Curriculum and Attendance Records
7. Site Review – Cross-Gender Searches; Cross-Gender Viewing
8. Interviews with 12 random staff and 22 random inmates. There were no transgender/intersex inmates. The facility does not house female inmates.

Findings:

- A) Cross-gender strip and visual body cavity searches are only done in emergencies or by medical staff. Cross-gender strip and visual body cavity searches are only done in emergencies or by medical staff. Extra precautions are taken to prevent or limit cross-gender viewing such as the use of shower curtains, privacy screens in medical, physical barriers, signage, and gender specific posts.
- B) The facility does not house female inmates.
- C) The facility does not house female inmates.
- D) Facility Operations Policy 030601 requires that an inmate be able to shower, perform bodily functions and change clothing without non-medical 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.
Announcements are made on housing units to alert inmates when female staff members will enter or be present on the housing unit. Officers will make one announcement at the beginning of their shift upon his/her arrival on the housing unit. Female officers or female staff not assigned to the specific unit will make an announcement every time they come onto the housing unit. Officers will make one announcement at the beginning of their shift upon his/her arrival on the housing unit. Female officers or female staff not assigned to the specific unit will make an announcement every time they come onto the housing unit.
- E) This provision is no longer applicable to your compliance finding.
- F) This provision is no longer applicable to your compliance finding.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>115.16 Inmates with Disabilities and Inmates Who Are Limited English Proficient</p> <p>Evidenced Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Facility Interpreter List 5. Unit Handbook in Spanish 6. Site Review: Interpretation Services 7. Interviews with the Administrator and four inmates with disabilities. There were no inmates who were limited English proficient. <p>Findings:</p> <p>A) The policy ensures that every inmate gets a written copy of the agency's orientation material in formats or methods that guarantee effective communication. Inmates whose first language isn't English will receive a copy or translation of the material in their language. If inmates face literacy challenges, intellectual disabilities, or visual/hearing impairments, they will be provided assistance to understand the material. This includes:</p> <ol style="list-style-type: none"> 1. Qualified interpreters for effective communication with deaf or hard-of-hearing individuals 2. Accessible written materials or alternate formats for individuals with limited reading skills or visual impairments 3. Compliance with the Americans with Disabilities Act (ADA), including exceptions only in cases of undue burden or fundamental alteration as defined under 28 CFR 35.164 <p>B) Reasonable steps are taken to ensure that individuals who are limited English proficient (LEP) have meaningful access to all aspects of PREA compliance efforts. This includes the use of interpreters capable of interpreting both effectively and impartially, using any necessary specialized vocabulary. Inmates with disabilities and who are limited English proficient are provided with PREA pamphlets available in 14 languages. Above and beyond having an external interpreter service, signage is</p>

posted in the facility to alert when opposite gender staff are present in the language required. Internally, a new handheld translation device, PocketTalk, is readily available to translate in 92 languages. PocketTalk was tested.

C) The facility avoids using inmate interpreters, readers, or assistants, except in rare and urgent situations where delays might risk safety, first-response duties, or an investigation's integrity. All inmate education is delivered by staff, with no reliance on inmate interpreters unless absolutely necessary. However, approved volunteers from the community or the facility may be involved.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	115.17 Hiring and Promotion Decisions Evidence Analyzed: 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Operation Procedure 110235 Hiring and Promotional Procedures 5. Operation Procedure 110210 Personnel 6. Roster of Completed Backgrounds on New Hires and Tenured Staff 7. Roster of New Hires date of Signing a Statement that they did not Commit Previous Sexual misconduct 8. Interview with HR staff Findings: A) The facility exceeds expectations in ensuring the integrity of its workforce. It does not hire, promote, or contract with any individual who has engaged in sexual abuse or sexual activity through coercion or force within any correctional or detention setting. Furthermore, the facility conducts rigorous background checks and screening processes to verify that no applicant, employee, or contractor has ever been convicted of, or found civilly or administratively responsible for, such conduct. This approach reflects the facility's commitment to safety, professionalism, and a zero-tolerance culture for sexual misconduct. Records were reviewed for compliance. B) Past incidents of sexual harassment are considered when hiring or promoting staff

who would have contact with inmates.

C) Criminal background checks and efforts to contact previous employers are part of the hiring process for anyone who may work with inmates. Records were reviewed for compliance.

D) Persons hired under contract (i.e., vendors) who have direct supervision of inmates/offenders, provide direct services to inmates/offenders, or have direct daily contact with inmates/offenders will require a complete criminal background records check with exception of educational transcripts/professional licenses. Records were reviewed for compliance.

E) At least every five years, district/facility/unit heads will be responsible for updating criminal records checks for current employees and contractors with a contract to include all employees at private prisons. In addition to the regular five-year checks, the agency utilizes an automated criminal infractions system for instant notification to the facility. Records were reviewed for compliance.

F) Applicants and staff must disclose any prior misconduct, and staff are required to report new incidents after hiring. Records were reviewed for compliance.

G) If someone lies or omits information about past misconduct, there are grounds for being terminated.

H) If the applicant is a prior employee of any institutional setting, the previous employer will be contacted to determine if the applicant has ever been the subject of a substantiated sexual abuse report or any resignations during a pending investigation. Records were reviewed for compliance.

115.18 Upgrades to facilities and technologies	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.18 Upgrades to Facilities and Technologies Evidence Analyzed: <ol style="list-style-type: none">1. Pre-Audit Questionnaire (PAQ)2. Camera Location Floor Plan3. Interviews with the administrator and Warden Findings:

- | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A) The facility has reported that no recent facility or technological upgrades have been made. |
| B) When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency considers how such technology enhances the agency's ability to protect inmates from sexual abuse. |

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	115.21 Evidence Protocol and Forensic Medical Examinations
	<p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. MOU with Woodward Sane Program at Integris Health Woodward 5. The National Protocol for Sexual Assault and Medical Examinations 6. Operations Policy 040117 Security 7. MOU with Northwest Domestic Crisis Services 8. Advocacy Service Posting 9. PREA Brochure 10. Sexual Misconduct Stats 11. Interviews with random staff, PREA Compliance Manager and one inmate who reported sexual abuse <p>Findings:</p> <p>A) The facility conducts formal and comprehensive investigations into all allegations of sexual abuse, misconduct, or related violations, reflecting ODOC's exceptional commitment to integrity and accountability. Investigations are carried out by Office of the Inspector General (OIG) staff or by other qualified personnel designated by the agency director. Each investigation is a thorough and objective inquiry that examines all acts, inferences, and circumstances connected to allegations whether originating from reports, grievances, or information obtained during routine operations. Staff are required to report any knowledge or suspicion of potential criminal activity or</p>

departmental violations involving inmates, offenders, visitors, employees, volunteers, contractors, or members of the public that could impact ODOC operations or safety. The facility also follows a consistent, well-documented evidence protocol in all sexual abuse cases. This protocol ensures that physical and testimonial evidence is properly identified, preserved, and collected to support administrative investigations and potential criminal or legal proceedings. This approach exhibits the facility's excellence in maintaining compliance with PREA and ODOC standards.

- B) The protocol is based on national standards and adapted to be age-appropriate when needed. The facility does not house youth.
- C) Residents reporting sexual abuse can access forensic medical exams free of charge when deemed evidentiary or medically necessary. These exams are conducted at an external facility, the Woodward Sane Program at Integris Health Woodward, and are typically performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). If SAFEs or SANEs are unavailable, qualified medical practitioners handle the examinations. The agency keeps records of all attempts to secure SAFEs or SANEs.
- D) The agency ensures that a victim advocate from a rape crisis center is available to support any resident victim of sexual abuse. They have an agreement with Northwest Domestic Crisis Services to provide personnel for hospital accompaniment during forensic exams and follow-up crisis counseling. If there's no local rape crisis center, the agency assigns a qualified staff member from a community-based organization or a trained agency staff member to take on this role. They also make sure any rape crisis center used is independent of the criminal justice system and maintains the same level of confidentiality as nongovernmental service providers.
- E) If the victim wants, an advocate or support person stays with them through exams and interviews, offering help and information throughout the process.
- F) An investigation is defined as a formal in-depth inquiry conducted by the office of the Inspector General staff or other staff member, as designated by the agency director.
- G) Auditor is not required to audit this provision.
- H) Anyone serving in a victim advocacy role is screened for suitability and trained in sexual assault response and forensic protocols. The advocacy Poster describes the zero-tolerance policy and the reporting procedures:

How can I report sexual abuse or harassment?

 1. Notify a facility staff member
 2. Call The PREA Hotline by using 073
 3. Write OSBI at:
6600 N Harvey Pl. Oklahoma City, OK, 73116

4. Have a third-party report for you.

Exceeding this standard, the Oklahoma Department of Corrections has in place a two-tier method of SANE examinations and a four-tier method of advocacy services. Each facility maintains its own MOU with a SANE Provider and Rape Crisis Center. As a second layer, the agency maintains an agency wide MOU with YWCA Oklahoma City, ensuring that any victim receives timely access to these services if the primary is unavailable.

Each facility also has a designated Qualified Staff Member who was chosen based on DOJ criteria and trained by the PREA Unit. The Agency also retains an agency-wide qualified staff member, based on experience and demeanor. Currently, this is the Project Manager, who also serves as secondary PREA Coordinator. These individuals will serve as advocates during the PREA investigation process for inmates if other avenues are not available.

115.22 Policies to ensure referrals of allegations for investigations	
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>115.22 Policies to Ensure Referrals of Allegations for Investigations</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Operations Policy 040117 Security 5. One PREA Investigation 6. Agency Website 7. Interviews with the agency head and investigation staff <p>Findings:</p> <p>A) All allegations of staff-on-inmate/offender sexual assaults or staff on staff sexual assaults or sexual battery complaints will be investigated by the office of the Inspector General. According to the information in the PAQ there have been one allegation of staff on offender sexual abuse that was unsubstantiated. This case was handled in accordance with ODOC policy and PREA standards, ensuring that</p>

investigations are prompt, thorough, and unbiased. Investigation files were reviewed.

B) The facility has a clear written policy requiring that all allegations be referred to the appropriate investigative authority. This policy is available to the public or through other channels and all referrals are documented. The auditor reviewed the agency website and the PREA section clearly outlines the reporting procedures: ODOC accepts and investigates reports regarding allegations or knowledge of sexual abuse of inmates and offenders from third parties (family, friends, clergy, vendors, contractors, or any other person having knowledge of an incident).

1. Send an email to preareport@doc.ok.gov.
2. Call the PREA Reporting line at 1-855-871-4139.
3. Call the ODOC Fugitive Apprehension and Investigations at 405-425-2571.
4. Verbally report to a ODOC facility administrator or staff member ODOC Facility Information.

C) All incidences of sexual abuse/assault or harassment, including third party and anonymous reports, will be reported to the OIG. The facility head/ unit head will ensure immediate verbal notification to the OIG or the OIG duty officer if physical evidence can be gathered. If physical evidence is not present due to the assault occurring more than 120 hours prior to notification or the event is defined as abusive sexual contact or sexual harassment rather than a non-consensual sexual act, notification will be made by 9:00 a.m. the following business day to the OIG.

D) The Auditor is not required to audit this provision.

E) The Auditor is not required to audit this provision

115.31	Employee training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	115.31 Employee Training
	<p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Staff PREA Training Curriculum 5. Staff Training Acknowledgements and Attendance Rosters

6. Interviews with random staff

Findings:

A) All staff who may have contact with inmates receive training to emphasize the zero tolerance of sexual abuse/harassment, aid in the prevention of sexual abuse and harassment of inmates and promote awareness of the serious impact of sexual victimization within the correctional setting. Topics include:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment.
 - (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.
 - (3) Residents' right to be free from sexual abuse and sexual harassment.
 - (4) The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment.
 - (5) The dynamics of sexual abuse and sexual harassment in juvenile facilities.
 - (6) The common reactions of juvenile victims of sexual abuse and sexual harassment.
 - (7) How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents.
 - (8) How to avoid inappropriate relationships with residents.
 - (9) This provision is no longer applicable to your compliance finding.
 - (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
- B) When an employee changes work locations, the new facility or unit should provide additional training for staff who transfer between male and female facilities.
- C) All newly hired ODOC employees receive the booklet "Sexual Misconduct and Harassment" All employees were trained within a year of the PREA standards taking effect. All employees were trained within a year of the PREA standards taking effect. PREA training is provided to staff annually, exceeding this standard.
- D) Training completion is documented through signatures or electronic records

115.32	Volunteer and contractor training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

115.32 Volunteer and Contractor Training

Evidence Analyzed:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
2. Facility Operations Policy 030601
3. Pre-Audit Questionnaire (PAQ)
4. 31 Volunteer/ Contractor PREA Training Attendance Records.
5. Interviews with Contractors / Volunteers

Findings:

- A) All volunteers and contractors who have contact with residents receive training on methods to prevent, identify, report, and address sexual abuse or harassment. Exceeding this standard, all contractors and volunteers receive PREA training annually.
- B) Training is provided according to each individual's role and level of contact with inmates; all participants receive information on the zero-tolerance policy and reporting procedures.
- C) The facility keeps documentation confirming that volunteers and contractors completed training and understood it.

115.33 Inmate education

Auditor Overall Determination: Exceeds Standard

Auditor Discussion

115.33 Inmate Education

Evidence Analyzed:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
2. Facility Operations Policy 030601
3. Pre-Audit Questionnaire (PAQ)
4. 30 Inmate PREA Training Acknowledgements.
5. Inmate Handbook in Spanish
6. Site review: Intake-PREA Information; Interpretation Services; Comprehensive PREA Education

7. Interviews with intake staff and inmates

Findings:

- A) During assessment and reception, all new inmates receive verbal and written information about sexual abuse and harassment. This information will address the agency and facility zero tolerance standard, prevention/intervention, self-protection, how to report acts or suspicions of sexual abuse, assaults or harassment by inmates or staff to include reporting utilizing the inmate PREA Hotline (073). Inmate phones have instructions for using the PREA Hotline posted in a conspicuous location on or near the phones. During a mock demonstration, sexual safety information (PREA information/zero-tolerance information) is provided at the point of intake or transfer. Intake staff are provided with on demand language line service information should bilingual staff be unavailable.
- B) Within 7 days, exceeding the standard, inmates receive full education (in person or on video). Every inmate receives a written copy of the agency's orientation material in formats or through methods to ensure effective communication. Inmates whose primary language is not English will be provided a copy or translation of the orientation material in their own language. If literacy problems, intellectual disabilities/disabilities (visual/hearing impairments) exist, the inmate will be assisted in understanding the material. All inmate education is provided to inmates by staff. No inmate interpreters will be utilized except in exigent circumstances. However, approved community or facility volunteers may be utilized. Comprehensive education is provided to inmates in 14 languages, in addition to ASL. Inmate issued tablets contain PREA information and education. PREA signage was observed in units and throughout the facility.
- C) Upon transfer to a different facility, the inmate will receive orientation in regard to PREA policies and procedures which may differ from a previous facility. Community centers will provide refresher information to transferred inmates.
- D) The facility makes sure PREA education is accessible for those who:
1. Are deaf, hard of hearing, or visually impaired
 2. Have limited English skills
 3. Have disabilities or low literacy
- E) The facility keeps records of who attends each PREA education session. This information was reviewed.
- F) Information is always available through posters, handbooks, and other materials in housing units and shared spaces. PREA signage was observed in English and Spanish.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

115.34 Specialized Training: Investigations

Evidence Analyzed:

Findings:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
 2. Facility Operations Policy 030601
 3. Pre-Audit Questionnaire (PAQ)
 4. Investigator Training Curriculum through the Department of Justice
 5. Investigator Certificates of Completed Training
 6. Interviews with investigation staff
- A) Employees who may handle reported incidents of sexual assault as part of their job receive specialized training. This training can cover areas such as crime scene management, preventing contamination following the "Bloodborne Pathogen Exposure Control Program," evidence collection protocols, and crisis intervention. ODOC Inspector General Agents also receive training specific to conducting sexual abuse investigations in confinement settings. Training is provided annually to all investigators, exceeding this standard.
- B) Investigators receive specialized training to manage sexual abuse cases in confinement. Topics include:
1. Crime scene handling
 2. Evidence collection
 3. Interviewing victims
 4. Using Miranda/Garrett warnings
 5. Crisis response
- C) The facility maintains records confirming that investigators have completed the training.
- D) Auditor is not required to audit this provision.

115.35 Specialized training: Medical and mental health care

Auditor Overall Determination: Exceeds Standard

Auditor Discussion

115.35 Specialized Training: Medical and Mental Health Care

Evidence Analyzed:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
2. Facility Operations Policy 030601
3. Pre-Audit Questionnaire (PAQ)
4. Medical Staff PREA Training Records
5. Interviews with medical and mental health staff

Findings:

- A) Mental Health and medical staff are provided training annually, exceeding the standard, to detect and assess signs of sexual abuse and/or predation, preserve evidence of sexual abuse, respond to sexual assault victims, and knowledge of department procedures in regard to the PREA reporting process. Specialized training will be conducted upon new hire and annually.
- B) The facility's medical team does not conduct these exams, as they are managed off-site.
- C) Training completion is documented and verified through in-house or outside providers.
- D) These practitioners also complete general PREA training as required for their position.

115.41 Screening for risk of victimization and abusiveness	
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>115.41 Screening for Risk of Victimization and Abusiveness</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. Facility Operations Policy 030601 2. Pre-Audit Questionnaire (PAQ) 3. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 4. Operations Policy 030102 Facility Operations 5. 30 Samples of Initial Assessments using the form Cell Assessments 6. Self-Report Form 7. Samples of 30 Re-Assessments with Dates of Initial Screening and Dates of Re-

screening

8. Site Review: PREA Risk Screening; Record Storage

9. Interviews with staff responsible for completing the risk screening, inmates, PREA Coordinator and PREA Compliance Manager

Findings:

A) According to the facility policy all inmates receive a mental health screening and/or evaluation, conducted by a trained mental health professional during the initial reception and assessment process within 24 hours of arrival.

B) Intake screening is usually completed within 72 hours of arrival.

C) The screening uses an objective tool to ensure fairness and consistency.

D) The facility looks at several factors to assess risk, such as:

1. Mental, physical, or developmental disabilities

2. Age

3. Physical build

4. Previous incarceration history

5. Nonviolent criminal history

6. Prior sex offense convictions

7. This provision is no longer applicable to your compliance finding.

8. History of sexual victimization

9. Personal perception of vulnerability

10. Civil immigration detention status

11. Risk of being sexually abusive is evaluated based on:

12. Prior acts of sexual abuse

13. Convictions for violent offenses

14. Institutional history of violence or sexual aggression

E) The initial risk assessment is reassessed within 30 days of intake based on any new or additional relevant information such as:

1. Referrals

2. Inmate requests

3. Incidents of sexual abuse

4. Additional relevant data

F) A follow-up screening is done within 30 days to account for any new information.

The Agency Policy states that based upon the inmate's risk for victimization or abusiveness, the inmate will be re-assessed as determined by the facility head, not to exceed 30 days, from the date of the last cell assessment.

G) Exceeding the standard, reassessments are conducted at least annually on every inmate and after incidents, requests, or other relevant changes.

H) Inmates are not punished for choosing not to answer sensitive questions during

the screening.

I) The facility protects screening information to make sure it is not misused or used in a way that could harm or retaliate against a resident. During the site review, the auditor observed that the risk screening is maintained electronically and is secured with limited access.

115.42 Use of screening information	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.42 Use of Screening Information</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none">1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act2. Facility Operations Policy 0306013. Pre-Audit Questionnaire (PAQ)4. Operations Policy 030102 Facility Operations5. Interviews with PREA Coordinator, PREA Compliance Manager, staff responsible for completing the risk screening, and gay inmates. There were no transgender or intersex inmates. <p>Findings:</p> <p>A) A) If the screening instrument indicates an inmate has a high risk of being sexually victimized or being sexually abusive, the Special Review Team shall, within one workday, conduct a follow-up interview. The Special Review Team shall consist of the following staff: CO IV, Captain, Associate Deputy Warden, Deputy Warden, or Warden. The Special Review Team shall first determine if the inmate is at a high risk of being sexually victimized and/or being sexually abusive. If the inmate is determined to be a high risk for either, the Special Review Team shall make individualized determinations about how to ensure the safety of each inmate by using information from the interview and the screening instrument to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>B) Individualized safety decisions are made for each inmate, based on the results of their screening.</p> <p>C) This provision is no longer applicable to your compliance finding.</p> <p>D) This provision is no longer applicable to your compliance finding.</p>

	<p>E) This provision is no longer applicable to your compliance finding.</p> <p>F) This provision is no longer applicable to your compliance finding.</p> <p>G) This provision is no longer applicable to your compliance finding.</p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.43 Protective Custody</p> <p>Evidence Analyzed:</p> <p>1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act</p> <p>2. Facility Operations Policy 030601</p> <p>3. Pre-Audit Questionnaire (PAQ)</p> <p>4. Interviews with Warden and staff who supervise inmates in segregated housing. There were no inmates in segregated housing for risk of sexual victimization or who alleged to have suffered sexual abuse.</p> <p>Findings:</p> <p>A) Inmates at high risk for sexual victimization are only placed in involuntary segregated housing after assessing all available alternatives and determining there is no other way to separate them from likely abusers. If a facility cannot perform this assessment right away, it may temporarily hold the inmate in involuntary segregated housing for up to 24 hours while completing the evaluation. Based on the PAQ data, no inmates have been placed in involuntary segregation in the past 12 months.</p> <p>B) Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education or work opportunities the facility shall document:</p> <p>1. The opportunities that have been limited.</p> <p>2. The duration of limitation; and</p> <p>3. The reasons for such limitations</p> <p>C) Segregation is only used while the facility works to find a safer, less restrictive housing option. Placement should never go beyond 30 days.</p> <p>D) If protective custody is used, the facility documents why it was needed and why other housing options were not possible.</p>

	E) Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------

115.51	Inmate reporting
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	115.51 Inmate Reporting Evidence Analyzed: 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Agency Website 5. MOU with Oklahoma State Bureau of Investigation 6. Unit 1 Trainee Handbook 7. PREA Incident Report 8. Site Review: Signage; Internal and External Reporting Methods; Sending and Receiving Mail Processes; Record Storage; Staff Reporting 9. Interviews with random staff and inmates, and PREA Compliance Manager Findings: A) Inmates can report incidents of sexual assault, abuse, or harassment to any staff member, contract worker, or volunteer using various communication methods, such as verbal reports or the "Inmate Grievance Process Request to Staff." The auditor reviewed the information provided on signage and determined it to be readable and accessible, consistent, and placed throughout the facility to convey vital sexual safety information specific to the facility. Internal reporting methods were tested, and it was determined that inmates have regular and timely access to reporting methods and how the facility receives these reports. Secured mailboxes/grievance boxes are kept locked and only retrieved by select staff. Exceeding the standard, inmates are provided with seven internal and external ways of reporting sexual abuse/sexual harassment, to include in writing, multiple phone hotlines, mail, email, inmate tablets and verbal. Reporting information is also posted in the SMU cell windows.

The facility maintains an excellent standard of responsiveness and accountability in addressing sexual abuse concerns. ODOC proactively accepts and thoroughly investigates all reports or information regarding allegations of sexual abuse involving inmates or offenders, including those received from third parties such as family members, friends, clergy, vendors, contractors, or any other individuals who may have knowledge of an incident. This commitment demonstrates the facility's exceptional dedication to transparency, safety, and the protection of all individuals in its care, ensuring that every report no matter the source is treated seriously, confidentially, and in full compliance with PREA requirements.

Inmates have several private ways to report, sexual abuse or harassment, retaliation for reporting, staff neglect or misconduct that contributes to abuse

The agency website clearly outlines reporting procedures:

1. Send an email to preareport@doc.ok.gov.
2. Call the PREA Reporting line at 1-855-871-4139.
3. Call the ODOC Fugitive Apprehension and Investigations at 405-425-2571.
4. Verbally report to a ODOC facility administrator or staff member ODOC Facility Information.

B) Inmates also have access to at least one outside agency (The Oklahoma State Bureau of Investigations) that can receive reports, even anonymously, and forward them to the facility. During the site review, the auditor observed signage with external reporting information. This was also tested to assure functionality and availability. Secure mailboxes are provided for outgoing mail, additionally inmates are provided with tablets with reporting features.

C) Staff accept reports in any form verbal, written, anonymous, or third-party and must document all verbal reports right away.

D) Staff may privately report allegations or incidents of sexual abuse/assault or harassment of an inmate to the OIG, PREA reporting line at 855-871-4139 or 405 425-2493, as well as preareport@doc.ok.gov

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.52 Exhaustion of administrative remedies Evidence Analyzed: <ol style="list-style-type: none">1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act2. Facility Operations Policy 030601

3. Pre-Audit Questionnaire (PAQ)
4. Programs Operations Policy 090124 Inmate Grievances
5. Site Review: Signage; Third Party Reporting
6. Interview with an inmate who reported sexual abuse
- Findings:
- A) The agency has a grievance policy.
- B) There is no time limit to report sexual abuse through a grievance. Reports can be made at any time. Time limits may apply to other grievance content not involving sexual abuse. Inmates are not required to use informal resolution steps before submitting grievance. This provision does not affect the agency's defense based on statute of limitations. According to the PAQ the facility has had no grievances on sexual abuse or harassment in the last 12 months. Signage is posted in each unit and other areas of the facility of the ways inmates can report a sexual abuse or sexual harassment allegation.
- C) Inmates are not required to submit grievances to the staff member referenced in the complaint, and grievances are not directed to that individual.
- D) The facility responds to grievances within 90 days. If more time is needed, the timeline can be extended up to 70 days with written notice. No response by the deadline counts as a denial.
- E) Third parties like other inmates, staff, family, or advocates—can help file or submit grievances on behalf of an inmate. The facility requires the inmate's consent to move forward and documents that consent. Third party reporting was displayed in housing units, public lobby and visitation areas.
- F) Emergency grievances alleging immediate risk must be addressed within 48 hours, with a final decision made within 5 days. Responses must include what was done to address the risk.
- G) Inmates can only be disciplined for filing a grievance in bad faith.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	115.53 Inmate Access to Outside Confidential Support Services Evidence Analyzed:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
2. Facility Operations Policy 030601
3. Pre-Audit Questionnaire (PAQ)
4. PREA Brochure
5. Victim Services Poster
6. MOU with Woodward Sane Program at Integris Health Woodward
7. Mou with Northwest Domestic Crisis Services

Findings:

A) A) The facility demonstrates an excellent commitment to inmate support and safety by ensuring that all inmates have clear and consistent access to information about victim advocacy and crisis services. Contact information for victim advocacy organizations is prominently displayed on posters throughout the facility, included in the inmate handbook, and shared through additional educational materials to ensure accessibility for all. Furthermore, through a formal Memorandum of Understanding (MOU) with Northwest Domestic Crisis Services, the facility ensures that inmates have direct access to qualified outside victim advocates for emotional support and crisis intervention. Exceeding the standard, the inmate PREA brochure is available in 14 languages. The agency provides four levels of emotional support services, internally and externally, beginning at the facility level. Secured mailboxes/grievance boxes are kept locked and only retrieved by select staff.

B) Inmates are told how much of their communication with these outside groups is confidential and whether staff are required to report what is shared.

C) The agency maintains a formal agreement with Northwest Domestic Crisis Services to provide confidential advocacy services.

115.54	Third-party reporting
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	115.54 Third-Party Reporting
	<p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601

- | | |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ol style="list-style-type: none"> 3. Pre-Audit Questionnaire (PAQ) 4. Agency Website 5. Site Review: Signage; Third Party Reporting |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Findings:

A) A process is in place for friends, family, or others outside the facility to report sexual abuse or harassment on behalf of an inmate. This reporting information is clearly posted on the department's website, in inmate handbooks, and on facility posters. Instructions include definitions, steps for submitting a report, and what happens during an investigation. ODOC accepts and investigates reports regarding allegations or knowledge of sexual abuse of inmates and offenders from third parties (family, friends, clergy, vendors, contractors, or any other person having knowledge of an incident).

Exceeding the standard, the agency provides five methods for third party reporting (hotlines, email and external reporting).

1. Send an email to preareport@doc.ok.gov.
2. Call the PREA Reporting line at 1-855-871-4139.
3. Call the ODOC Fugitive Apprehension and Investigations at 405-425-2571.
4. Verbally report to a ODOC facility administrator or staff member ODOC Facility Information.
5. Notify the PREA Coordinator.

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.61 Staff and Agency Reporting Duties
	<p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Site Review: Staff Reporting

5. Interviews with random staff, medical and mental health staff, Warden and PREA Coordinator

Findings:

A) All staff, volunteers, and contractors must promptly report to their supervisor or higher authority any knowledge, suspicion, or information about incidents of sexual abuse, assault, harassment, retaliation against someone who reported or cooperated, or staff negligence that may have contributed to such incidents. These incidents may occur in a facility, unit, or any other location, whether or not it is part of the agency. Reports should be made to a supervisor or higher authority immediately.

B) Reports are kept confidential and only shared as needed for treatment, investigation, or safety.

C) Medical and mental health staff are mandated reporters. They inform inmates of this duty at the beginning of services.

D) The facility does not house youthful inmates.

E) All documents related to sexual assault claims, such as incident reports, investigative reports, inmate details, case outcomes, medical and mental health evaluations, and recommendations for post-release treatment or counseling, are confidential and kept by ODOC. Investigative files are classified as confidential information, and the OIG will securely retain copies of these files.

115.62 Agency protection duties

Auditor Overall Determination: Meets Standard

Auditor Discussion

115.62 Agency Protection Duties

Evidence Analyzed:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act

2. Facility Operations Policy 030601

3. Pre-Audit Questionnaire (PAQ)

4. One Memo of a PREA Allegation

5. Interviews with the Administrator, Warden and random staff

Findings:

A) When the facility learns an inmate may be at immediate risk of sexual abuse, staff act quickly to protect the inmate. According to the PAQ, there was one case during

	the review period and the inmate stated he had no fear of abuse.
--	------------------------------------------------------------------

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.63 Reporting to Other Confinement Facilities
	Evidence Analyzed:
	<ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Interviews with the Administrator and Warden
	Findings:
	<p>(a) Upon receiving an allegation of an inmate being sexually abused while confined at another facility/unit or contract facility, the head of the facility/unit who received the allegation shall notify the head of the facility/unit or appropriate office of the agency where the alleged abuse occurred. According to the information in the PAQ there have been no notifications in the last 12 months.</p> <p>(b) Such notifications shall occur by the facility/unit head as soon as received and no later than 72 hours after receiving the allegation.</p> <p>(c) The facility will document the reporting of the allegation notification.</p> <p>(d) The facility/unit head or office receiving such notification shall ensure the allegation is reported to the OIG for investigation.</p>

115.64	Staff first responder duties
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	115.64 Staff First Responder Duties
	Evidence Analyzed:
	<ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act

- 2. Facility Operations Policy 030601
- 3. Pre-Audit Questionnaire (PAQ)
- 4. First Responder Duties
- 5. First Responder Duties Staff Card
- 6. Interviews with random staff, security staff and non-security staff first responders and an inmate who reported a sexual abuse

Findings:

(a) Exceeding this standard, staff are provided with a wallet size First Responder Duty card that they carry on their possession. Staff interviewed were very aware of the steps they would take as a first responder and were aware of the contents on the first responder duties card. Upon learning of an allegation that an inmate was sexually abused: If the first staff member to respond is a correctional officer the following is required:

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

(b) In situations where the first responder is not a security staff member, the responder is required to instruct the alleged victim not to take any actions that could destroy evidence and immediately notify security staff to assume control of the response.

115.65	Coordinated response
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	115.65 Coordinated Response
	<p>Evidence Analyzed:</p> <ul style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601

	<p>3. Pre-Audit Questionnaire (PAQ)</p> <p>4. Charles E. 'Bill' Johnson Correctional Center PREA Coordinated Response Plan</p> <p>5. Interview with the Warden</p> <p>Findings:</p> <p>(a) The facility has a written plan detailing how roles of first responders, medical and mental health staff, investigators, and facility leadership work together when addressing a sexual abuse allegation. Exceeding the standard, the facility-level coordinated response plan is reviewed and approved by the PREA Coordinator as well, to ensure this standard is implemented sufficiently throughout the facility.</p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.66 Preservation of Ability to Protect Inmates</p> <p>Evidence Analyzed:</p> <p>1. Pre-Audit Questionnaire (PAQ)</p> <p>2. Interview with the Administrator</p> <p>Findings:</p> <p>A) B) According to the information in the PAQ (Pre-Audit Questionnaire) and interview, the agency does not enter into agreements (such as collective bargaining contracts).</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>115.67 Agency Protection Against Retaliation</p> <p>Evidence Analyzed:</p> <p>1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act</p>

	<p>2. Facility Operations Policy 030601</p> <p>3. Pre-Audit Questionnaire (PAQ)</p> <p>4. Interviews with Administrator, Warden, designated staff member charged with monitoring retaliation, and an inmate who reported sexual abuse. There were no inmates held in segregation for risk of sexual victimization or who alleged to have suffered sexual abuse.</p> <p>Findings:</p> <p>A) The facility ensured any inmate or staff reporting allegations of sexual abuse or sexual harassment or cooperate in an investigation involving such allegations are protected from retaliation by other inmates or staff. The facility/unit head designated a staff to monitor retaliation and take appropriate action.</p> <p>B) The facility implements protective measures, including housing changes or transfers for inmate victims or abusers, removing alleged staff or inmate abusers from contact with victims, and providing emotional support services like mental health care for inmates. Additionally, the Employee Assistance Program will support staff who fear retaliation for reporting sexual abuse or harassment or for cooperating with investigations.</p> <p>C) For at least 90 days after a report of sexual abuse or harassment, a designated monitor at the facility reviews the behavior and treatment of inmates or staff who reported the incident, as well as those who were reported to have been victims, for any signs of possible retaliation. Any findings are reported to the facility or unit head, who must take swift action to address and prevent such retaliation. The facility monitoring includes:</p> <ul style="list-style-type: none"> 1. Disciplinary actions 2. Housing and job changes 3. Performance reviews <p>Exceeding this standard, retaliation monitoring is provided to not only the victim but the alleged abuser.</p> <p>D) Periodic status checks are conducted with inmates.</p> <p>E) Anyone expressing fear of retaliation receives protection.</p> <p>F) Auditor is not required to audit this provision.</p>
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

115.68 Post-Allegation Protective Custody

Evidence Analyzed:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
2. Facility Operations Policy 030601
3. Pre-Audit Questionnaire (PAQ)
4. Interviews with Warden, and staff who supervise inmates in segregated housing.
There were no inmates held in segregation for risk of sexual victimization or who alleged to have suffered sexual abuse.

Findings:

A) The facility did not place any inmates in involuntary segregation for protection following an allegation of sexual abuse. If protective custody is needed, the facility would follow the requirements in 115.43, including:

1. Reviewing and documenting alternatives
2. Limiting placement to 30 days
3. Maintaining access to programs and services
4. Documenting reasons and conducting 30-day reviews

According to the information in the PAQ no inmates have been placed in involuntary segregation.

115.71 Criminal and administrative agency investigations

Auditor Overall Determination: Exceeds Standard

Auditor Discussion

115.71 Criminal and Administrative Agency Investigations

Evidence Analyzed:

1. OP-040117 Investigations
2. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
3. Facility Operations Policy 030601
4. Pre-Audit Questionnaire (PAQ)
5. Site Review: Record Storage

6. Interviews with investigative staff, an inmate who reported sexual abuse, Warden, PREA Coordinator, and PREA Compliance Manager
- A) The facility demonstrates exemplary commitment to accountability and transparency by ensuring that all allegations of sexual abuse and sexual harassment including those received through third-party and anonymous reports are immediately reviewed and assessed. Each report is carefully evaluated to determine whether sufficient information exists to initiate a formal investigation, which is then conducted promptly, thoroughly, and objectively in accordance with ODOC and PREA standards. This approach ensures that every allegation is taken seriously, that no report is disregarded, and that the facility maintains the highest level of professionalism and integrity in protecting the safety and rights of all individuals in its care. The review confirmed that all investigations were handled in accordance with ODOC policy and demonstrated a consistent commitment to transparency, thoroughness, and accountability.
- B) The agency uses specially trained investigators for sexual abuse cases, which receive specialized training annually.
- C) Investigators are required to:
1. Collect physical, DNA, and electronic evidence.
 2. Interview all relevant parties.
 3. Review prior similar allegations against the accused.
- D) Agencies consult with prosecutors before conducting compelled interviews in potential criminal cases.
- E) Polygraphs or truth-telling devices may not be used as a condition for proceeding with investigations.
- F) Physical storage of investigation reports are maintained in a secure location with limited access. Administrative investigations must:
1. Examine whether staff actions or omissions contributed to the abuse.
 2. Be documented with clear findings, credibility assessments, and evidence.
- G) Criminal investigations must also be documented with supporting evidence attached where feasible.
- H) Substantiated criminal allegations must be referred for prosecution.
- I) Reports must be retained for the duration of the alleged abuser's employment or incarceration, plus five years.
- J) Investigations must continue even if the alleged abuser or victim leaves the agency's control.
- K) The Auditor is not required to audit this provision.
- L) Outside agency investigators must adhere to these standards, and facilities must cooperate and stay informed about those investigations.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.72 Evidentiary Standard for Administrative Investigations
	<p>Evidenced Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Interviews with investigative staff <p>Findings:</p> <p>A) The facility follows the standard outlined in the PREA policy, using a preponderance of the evidence as the threshold for determining whether allegations of sexual abuse or harassment are substantiated. No higher evidentiary standard is applied in administrative investigations.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.73 Reporting to Inmates
	<p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. One PREA Investigation 5. One Notification to the Inmate at the completion of the investigation 6. Interviews with Warden, investigative staff and an inmate who reported sexual abuse <p>Findings:</p>

- A) Inmates are informed of the outcome (substantiated, unsubstantiated, or unfounded) of any sexual abuse investigation they initiate. There was 1 allegation of staff on offender of sexual abuse. The investigation indicated the allegation of sexual abuse was unsubstantiated.
- B) If an outside agency conducted the investigation, the facility requests the outcome to inform the inmate. The facility notified the inmate of the outcome of the investigation.
- C) If the allegation involves staff misconduct and is not determined to be unfounded, the agency notifies the resident of the following, as applicable:
1. The staff member is no longer assigned to the resident's unit.
 2. The staff member is no longer employed at the agency.
 3. The staff member has been indicted on a charge related to the sexual abuse; or
 4. The staff member has been convicted of a charge related to the sexual abuse.
- D) If another inmate is the subject of a substantiated allegation, the victim is notified of any related charges or convictions.
- E) All notifications and attempts are documented.
- F) Auditor is not required to audit this provision.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.76 Disciplinary Sanctions for Staff</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) <p>Findings:</p> <p>A) Staff are subject to disciplinary action, up to and including termination, for violating sexual abuse or harassment policies. According to the PAQ no Staff have violated the zero-tolerance policy in the last 12 months.</p> <p>B) Termination is the presumptive sanction for substantiated sexual abuse.</p> <p>C) Sanctions are based on the seriousness of the offense, past disciplinary history,</p>

	<p>and consistency with other cases.</p> <p>D) All terminations or resignations related to sexual misconduct are reported to law enforcement and licensing bodies, unless clearly non-criminal. According to the information in the PAQ 0 Staff have been terminated or disciplined for violation the zero- tolerance policy.</p>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.77 Corrective Action for Contractors and Volunteers</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Interview with the Warden <p>Findings:</p> <p>A) Contractors or volunteers who engage in sexual abuse are banned from inmate contact and reported to law enforcement and licensing agencies. According to the PAQ no volunteers or contractors have violated the zero-tolerance policy in the last 12 months.</p> <p>B) Other violations are addressed with appropriate corrective action, including possible termination of access.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.78 Disciplinary Sanctions for Inmates</p> <p>Evidence Analyzed:</p>

	<ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Interviews with Warden and medical and mental health staff <p>Findings:</p> <ul style="list-style-type: none"> A) Inmates may be disciplined after a substantiated administrative or criminal finding of inmate-on-inmate sexual abuse. According to the information in the PAQ no inmates have been disciplined for sexual misconduct in the last 12 months. B) Sanctions reflect the severity of the offense and the inmate's disciplinary history. C) Mental illness or disability is considered in the disciplinary process. D) Inmates may be required to participate in counseling or treatment programs. E) Inmates are only disciplined for sexual contact with staff if the staff member did not consent. F) Inmates are not punished for making good faith reports, even if unsubstantiated. G) Non-coercive sexual activity is not misclassified as sexual abuse.
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.81 Medical and Mental Health Screenings: History of Sexual Abuse</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. OP-14013 Health Services 5. One PREA Checklist 6. Medical/Mental Health Checks 7. Site Review: Records Storage

8. Interviews with medical and mental health staff, staff responsible for risk screening and an inmate who disclosed sexual victimization during the risk screening

Findings:

A) If the screening indicates an inmate has experienced or perpetrated prior sexual victimization, whether it occurred in an institutional setting or in the community setting, staff shall ensure the inmate is offered a follow-up meeting with a mental health provider within 14 days of the intake screening. The facility states that no incoming inmates disclosed prior sexual abuse or being a perpetrator of sexual abuse in the last 12 months. Samples of medical encounters were provided.

B) If the screening shows an inmate has perpetrated prior sexual victimization, either in an institution or in the community, staff must ensure they are offered a follow-up meeting with a mental health provider within 14 days of the intake screening. The facility states that no incoming inmates disclosed prior sexual abuse or being a perpetrator of sexual abuse in the last 12 months.

C) Information about prior victimization or abuse is shared only with staff involved in medical, mental health, or classification decisions, in accordance with privacy laws. The facility guarantees a follow-up meeting with a qualified medical or mental health professional within 14 days.

D) Information about past abuse is shared only on a need-to-know basis for safety, treatment, or management decisions. Records are maintained through an electronic record system with secure and limited access.

E) Informed consent is obtained before disclosing information about non-institutional sexual victimization unless the resident is under 18. Samples of inmate consent forms were reviewed.

115.82 Access to emergency medical and mental health services

Auditor Overall Determination: Exceeds Standard

Auditor Discussion

115.82 Access to Emergency Medical and Mental Health Services

Evidence Analyzed:

1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act
2. Facility Operations Policy 030601
3. Pre-Audit Questionnaire (PAQ)
4. OP-14013 Health Services

<p>5. One Medical Referral after an Allegation of Sexual Abuse</p> <p>6. Interviews with medical and mental health staff, an inmate who reported sexual abuse, and security and non-security staff first responders.</p> <p>Findings:</p> <p>A) Victims of sexual abuse receive timely access to emergency medical care and crisis intervention. The Oklahoma Department of Corrections has in place a 2-tier method of SANE examinations and a 4-tier method of advocacy services. Each facility maintains its own MOU with a SANE Provider and Rape Crisis Center. As a second layer, the agency maintains an agency wide MOU with YWCA Oklahoma City, ensuring that any victim receives timely access to these services if the primary is unavailable. Each facility also has a designated Qualified Staff Member who was chosen based on DOJ criteria and trained by the PREA Unit. The Agency also retains an agency-wide qualified staff member, based on experience and demeanor. Currently, this is Aspen Sutherland, Project Manager, who also serves as secondary PREA Coordinator. These individuals will serve as advocates during the PREA investigation process for inmates if other avenues are not available. Due to the multiple layers ensuring that inmates receive unimpeded access to medical and crisis intervention services, the facility exceeds this standard.</p> <p>B) If no qualified health staff are present, first responders immediately notify medical staff.</p> <p>C) Care includes:</p> <ol style="list-style-type: none"> 1. Emergency contraception 2. STI prophylaxis when medically indicated <p>D) All care is provided at no cost, regardless of whether the victim cooperates with an investigation.</p>

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.83 Ongoing Medical and Mental Health Care</p> <p>Evidence Analyzed:</p> <p>1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act</p>

- | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>2. Facility Operations Policy 030601</p> <p>3. Pre-Audit Questionnaire (PAQ)</p> <p>4. OP-14018 Health Services</p> <p>5. Interviews with medical and mental health staff and an inmate who reported sexual abuse</p> <p>Findings:</p> <p>A) The facility offers medical and mental health evaluations and, when needed, treatment for all inmates who have experienced sexual abuse in any prison, jail, lockup, or juvenile facility.</p> <p>B) Assessing and treating these victims includes offering follow-up services, developing treatment plans, and, when necessary, arranging referrals for ongoing care after they are transferred to other facilities, placed elsewhere, or released from custody.</p> <p>C) The facility shall provide such victims with medical and mental health services consistent with the community level of care.</p> <p>D) E) This is an all-male facility.</p> <p>F) Inmates who experience sexual abuse during incarceration should be provided with tests for sexually transmitted infections when medically appropriate.</p> <p>G) Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>H) The facility will evaluate the mental health of all known inmate-on-inmate abusers within 60 days of discovering their history and provide treatment if recommended by mental health professionals.</p> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

<p>115.86</p>	<p>Sexual abuse incident reviews</p> <p>Auditor Overall Determination: Exceeds Standard</p> <p>Auditor Discussion</p> <p>115.86 Sexual Abuse Incident Reviews</p> <p>Evidence Analyzed:</p> <p>1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act</p> <p>2. Facility Operations Policy 030601</p>
----------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

3. Pre-Audit Questionnaire (PAQ)
4. One Incident Review
5. Interviews with Warden, PREA Compliance Manager and other incident review team members
- Findings:
- A) It is Oklahoma Department of Corrections Policy to conduct “Incident Reviews” on every PREA allegation, including unfounded. This is to look for vulnerabilities that inmates are able to exploit, as well as stopping any weakness resulting in a future PREA allegation. Because the standard only requires Substantiated and Unsubstantiated allegation incident reviews to be conducted, exceeding this standard.
- B) Reviews are completed within 30 days of receiving the investigation’s findings.
- C) The review team includes facility leadership, supervisors, investigators, medical/mental health staff, and the PREA Compliance Manager.
- D) The team shall:
1. Policy effectiveness
 2. This provision is no longer applicable to your compliance finding.
 3. Facility layout and blind spots
 4. Staffing and monitoring technology
 5. Prepare a report of its findings.
- E) The facility either follows the team’s recommendations or provides documented reasons for not doing so. The results are then submitted to the agency PREA Coordinator and administrator within 30 days of the review.

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.87 Data Collection
	<p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601

- 3. Pre-Audit Questionnaire (PAQ)
- 4. 2012-2023 PREA Annual Reports
- 5. PREA Audit Report from 2022
- 6. Agency Website

Findings:

- A) The office of the Inspector General collects accurate, uniform data for every allegation of sexual abuse at facilities using a standardized instrument and set of definitions. The data is securely retained. The auditor reviewed the department website and reviewed all of the yearly PREA reports and Samples of Institutional PREA reports.
- B) Incident-based data is aggregated annually.
- C) Incident-based data collected 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.
- D) The agency maintained, reviewed, and collected data as needed from all incident-based documents, including reports, investigation files, and sexual abuse incident reviews.
- E) The agency does not use private facilities.
- F) All data is retained and submitted to DOJ by June 30 annually upon request.

115.88 Data review for corrective action	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.88 Data Review for Corrective Action
	<p>Evidence Analyzed:</p> <ul style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Agency Website 5. Sample of 2020 and 2021 Corrective Action Plan

<p>6. 2020 Annual Report of Sexual Violence</p> <p>7. Interviews with PREA Coordinator, Administrator and the PREA Compliance Manager</p>	<p>Findings:</p> <p>A) The agency aggregates the incident-based sexual abuse data at least annually.</p> <p>B) An annual report is prepared, comparing data across years and assessing progress.</p> <p>C) The report is approved by leadership.</p> <p>D) Reports are posted publicly on the agency website. The auditor confirmed that the department's website contains all required data, with personal identifiers appropriately excluded.</p>
-------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

115.89	Data storage, publication, and destruction
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>115.89 Data Storage, Publication, and Destruction</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. OP-030601 Field Memorandum: Oklahoma Prison Rape Elimination Act 2. Facility Operations Policy 030601 3. Pre-Audit Questionnaire (PAQ) 4. Agency Website 5. Site Review: Records Storage 6. Interview with PREA Coordinator <p>Findings:</p> <p>A) All collected data is securely retained.</p> <p>B) Aggregated data from all facilities is published annually. The department website was analyzed and contains all required, redacted PREA data.</p> <p>C) Personal identifiers are removed before publication to protect resident privacy. As evidenced by reviewing the department website it contains all information as required by this standard. The website was reviewed to verify that sexual abuse data is publicly made available and does not include any personally identifiable information.</p>

	D) Data is retained for at least 10 years unless required longer by law. The department website was analyzed and contains all required, redacted PREA data.
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------

115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>115.401 Frequency and Scope of Audits</p> <p>Evidence Analyzed:</p> <ol style="list-style-type: none"> 1. Agency Website 2. Site Review 3. Issue Log 4. PAQ (pre audit questionnaire) 5. Notice of Audit (NOA) <p>Findings:</p> <p>A) During the prior three-year period, the agency has ensured that each facility it operates, and contracted facilities is audited at least once. This was verified by a review of Final Audit Report's found on the agency website.</p> <p>B) This is the first year of the current audit cycle. In review of the agency website, the agency has ensured that at least one-third of each facility type operated by the agency, or contracted, were audited during the first year of the current audit cycle.</p> <p>H) The auditor had access to, and the ability to observe, all areas of the audited facility. The auditor completed a full site review.</p> <p>(I) The auditor received copies of all relevant documents requested, including electronically stored information.</p> <p>(M) The auditor conducted interviews with inmates in a private setting.</p> <p>(N) The auditor observed Notice of Audit (NOA) signage displayed in all housing units, and other areas throughout the facility. The NOA was provided to the facility by the auditor at least six weeks in advance and posted in English and Spanish. The NOA included the posting date, and the facility provided via a time stamped email photos of each posting.</p>

115.403	Audit contents and findings
----------------	------------------------------------

Auditor Overall Determination: Meets Standard
Auditor Discussion
115.403 Audit Contents and Findings
Evidence Analyzed:
1. Agency Website
Findings:
A) The auditor verified that the agency has published on its website all Final PREA Audit Reports completed during the past three years proceeding this audit.

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.)	na
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	na

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

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

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

	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)?	na
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.)	na
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	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	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	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	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	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.)	yes

115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective 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.)	yes
	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.)	yes
	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.)	yes
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	no

	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 reassessments 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.)	na
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.)	na
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) <i>Sexual abuse incident reviews</i>		
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c) <i>Sexual abuse incident reviews</i>		
	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) <i>Sexual abuse incident reviews</i>		
	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) <i>Sexual abuse incident reviews</i>		
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a) <i>Data collection</i>		
	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) <i>Data collection</i>		

	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.)	
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--