

# PREA Facility Audit Report: Final

**Name of Facility:** Larimer County Community Corrections Residential Program

**Facility Type:** Community Confinement

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 01/15/2022

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" 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 checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Karen d. Murray	<b>Date of Signature:</b> 01/15/2022

AUDITOR INFORMATION	
<b>Auditor name:</b>	Murray, Karen
<b>Email:</b>	kdmconsults1@gmail.com
<b>Start Date of On-Site Audit:</b>	12/13/2021
<b>End Date of On-Site Audit:</b>	12/15/2021

FACILITY INFORMATION	
<b>Facility name:</b>	Larimer County Community Corrections Residential Program
<b>Facility physical address:</b>	2255 Midpoint Drive , Fort Collins , Colorado - 80525
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	

Primary Contact	
<b>Name:</b>	Nikki Henneman
<b>Email Address:</b>	hennemnm@co.larimer.co.us
<b>Telephone Number:</b>	9709802675

Facility Director	
<b>Name:</b>	Emily Humphrey
<b>Email Address:</b>	humphreh@co.larimer.co.us
<b>Telephone Number:</b>	9709802671

Facility PREA Compliance Manager	
<b>Name:</b>	Dana Hersch
<b>Email Address:</b>	herschda@co.larimer.co.us
<b>Telephone Number:</b>	O: 970-498-7558
<b>Name:</b>	Michael Ruttenburg
<b>Email Address:</b>	ruttenme@co.larimer.co.us
<b>Telephone Number:</b>	O: 970-498-7554
<b>Name:</b>	Kathleen Prevost
<b>Email Address:</b>	prevoskj@co.larimer.co.us
<b>Telephone Number:</b>	O: 970-980-2645

Facility Characteristics	
<b>Designed facility capacity:</b>	546
<b>Current population of facility:</b>	353
<b>Average daily population for the past 12 months:</b>	333
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	18-80
<b>Facility security levels/resident custody levels:</b>	Minimum
<b>Number of staff currently employed at the facility who may have contact with residents:</b>	208
<b>Number of individual contractors who have contact with residents, currently authorized to enter the facility:</b>	17
<b>Number of volunteers who have contact with residents, currently authorized to enter the facility:</b>	18

AGENCY INFORMATION	
<b>Name of agency:</b>	Larimer County Criminal Justice Services
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	2307 Midpoint Drive, Fort Collins , Colorado - 80525
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

Agency Chief Executive Officer Information:	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

Agency-Wide PREA Coordinator Information			
<b>Name:</b>	Nikki Henneman	<b>Email Address:</b>	hennemnm@co.larimer.co.us

**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:	
5	<ul style="list-style-type: none"> <li>• 115.215 - Limits to cross-gender viewing and searches</li> <li>• 115.222 - Policies to ensure referrals of allegations for investigations</li> <li>• 115.263 - Reporting to other confinement facilities</li> <li>• 115.286 - Sexual abuse incident reviews</li> <li>• 115.287 - Data collection</li> </ul>
Number of standards met:	
36	
Number of standards not met:	
0	

# POST-AUDIT REPORTING INFORMATION

## GENERAL AUDIT INFORMATION

### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2021-12-13
2. End date of the onsite portion of the audit:	2021-12-15

### 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:	Sexual Assault Victims Advocacy Center (SAVA) 4812 S. College Ave, Fort Collins, CO 80525, (970) 472-4204"

## AUDITED FACILITY INFORMATION

14. Designated facility capacity:	546
15. Average daily population for the past 12 months:	353
16. Number of inmate/resident/detainee housing units:	11
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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	622
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	1
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	1
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	1

41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	1
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	1
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	1
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	1
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	4
46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	3
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	This facility does not have any type of restrictive housing.
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	202
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	18
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	17
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	18
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The facility was asked to provide resident rosters with as much of the above information as possible. I then selected every sixth resident from each roster to ensure a diverse random sample was interviewed.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	6
<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>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0

<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>There were no residents with a physical disability that the Auditor witnessed during tours and or reported.</p>
<p>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility stated there were none and the Auditor didn't learn otherwise while at the facility.</p>
<p>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>

67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	1
68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	1
69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	This facility does not have any type of segregated housing.
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
<b>Staff, Volunteer, and Contractor Interviews</b>	
<b>Random Staff Interviews</b>	
71. Enter the total number of RANDOM STAFF who were interviewed:	10
72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input checked="" type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input checked="" type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes  <input type="radio"/> No



<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>Random staff chosen were from each shift, security staff only, male and female.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>10</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>78. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>79. Were you able to interview the PREA Compliance Manager?</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" 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)</p>

<p><b>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Agency contract administrator</li> <li><input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</li> <li><input checked="" type="checkbox"/> Line staff who supervise youthful inmates (if applicable)</li> <li><input type="checkbox"/> Education and program staff who work with youthful inmates (if applicable)</li> <li><input type="checkbox"/> Medical staff</li> <li><input type="checkbox"/> Mental health staff</li> <li><input type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches</li> <li><input checked="" type="checkbox"/> Administrative (human resources) staff</li> <li><input type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</li> <li><input checked="" type="checkbox"/> Investigative staff responsible for conducting administrative investigations</li> <li><input type="checkbox"/> Investigative staff responsible for conducting criminal investigations</li> <li><input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness</li> <li><input type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation</li> <li><input checked="" type="checkbox"/> Staff on the sexual abuse incident review team</li> <li><input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation</li> <li><input type="checkbox"/> First responders, both security and non-security staff</li> <li><input checked="" type="checkbox"/> Intake staff</li> <li><input type="checkbox"/> Other</li> </ul>
<p><b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>a. Enter the total number of CONTRACTORS who were interviewed:</b></p>	<p>1</p>

<p><b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<p><input type="checkbox"/> Security/detention</p> <p><input type="checkbox"/> Education/programming</p> <p><input type="checkbox"/> Medical/dental</p> <p><input checked="" type="checkbox"/> Food service</p> <p><input type="checkbox"/> Maintenance/construction</p> <p><input type="checkbox"/> Other</p>
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<p><b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b></p>	<p>Specialized staff chosen were those individuals required of the Auditor Handbook.</p> <p>This facility does not employ medical or mental health staff; however, I did interview a case manager and a facility trained advocate to ensure services were available required for confinement facilities.</p>
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## 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: discussions related to testing critical functions are expected to be included in the relevant Standard-specific overall determination narratives.

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

<p><b>85. Reviewing/examining all areas of the facility in accordance with the site review component of the audit instrument?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p><b>86. Testing and/or observing all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., intake process, risk screening process, PREA education)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p><b>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p><b>88. Informal conversations with staff during the site review (encouraged, not required)?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>A standard practice of this Auditor is to interview informally during tours. during this audit, I informally spoke with four residents and four staff. One resident was able to give me a tour of the resident 'kiosk' which is a computer where she was able to access PREA information, grievance forms, agency rules, handbooks, and enter communications to different staff of all levels within the agency. All residents are allowed to have and use their phones at designated time and locations on the facility grounds are able to contact an outside source for reporting. Informal interviews with staff demonstrated they would assist residents with hotline calls at a staff desk and monitor them from an office window to ensure their mental health affect was stable.</p>
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**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><b>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p><b>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>Due to agency policy not being inclusive of each standard practice required, the agency provided a memo for the following standards to be added to agency policy and or practice. 115.217, 115.218, 115.251115.252, 115.252, 115.253, 115.261, 115.263, 115.267, 115.283</p>
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**SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY**

**Sexual Abuse and Sexual Harassment Allegations and Investigations Overview**

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual abuse</b>	7	4	4	4
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0
<b>Total</b>	7	4	4	4

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual harassment</b>	1	0	1	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	1	0	1	0

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/Court Case Filed	Convicted/Adjudicated	Acquitted
<b>Inmate-on-inmate sexual abuse</b>	0	4	1	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Total</b>	0	4	1	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	3	5
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0
<b>Total</b>	0	0	3	5

### Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	1	0
Staff-on-inmate sexual harassment	0	0	0	0
<b>Total</b>	0	0	1	0

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:	7
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)

**Inmate-on-inmate sexual abuse investigation files**

100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	7
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)

**Staff-on-inmate sexual abuse investigation files**

103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<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 abuse investigation files)
105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<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 abuse investigation files)
<b>Sexual Harassment Investigation Files Selected for Review</b>	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	1
107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
<b>Inmate-on-inmate sexual harassment investigation files</b>	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<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)
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
<b>Staff-on-inmate sexual harassment investigation files</b>	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0

<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>All investigations in the past 12 months were reviewed using the PREA Audit - Community Confinement Facility Documentation Review Investigation Template.</p>

## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

<p>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
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### Non-certified Support Staff

<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
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## AUDITING ARRANGEMENTS AND COMPENSATION

<p>121. Who paid you to conduct this audit?</p>	<p><input checked="" type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
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## Standards

### Auditor Overall Determination Definitions

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

### Auditor Discussion Instructions

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.211	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1473 654" style="list-style-type: none"> <li data-bbox="240 331 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="240 389 1433 448">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, dated 7.20.2021</li> <li data-bbox="240 479 1473 537">3. Larimer County Alternative Sentencing Division Alternative Sentencing Department Work Release Offender Handbook, dated 4.2021</li> <li data-bbox="240 568 1038 595">4. Larimer County Community Corrections Resident Guidebook, dated 6.2021</li> <li data-bbox="240 627 1086 654">5. Larimer County Criminal Justice Services Organizational Chart, dated 6.30.2021</li> </ol> <p data-bbox="240 739 352 766">Interviews:</p> <ol data-bbox="240 797 475 999" style="list-style-type: none"> <li data-bbox="240 797 475 824">1. Random residents</li> <li data-bbox="240 855 475 882">2. Targeted residents</li> <li data-bbox="240 913 424 940">3. Random staff</li> <li data-bbox="240 972 475 999">4. PREA Coordinator</li> </ol> <p data-bbox="240 1025 1485 1155">Through interviews with residents and staff and review of resident and staff files, it is evident that this facility interweaves requirements for this standard in their daily protocols. Both residents and staff could speak to facility PREA practices and protocols being used as is described in the agency's PREA policy. The PREA Coordinator could attest to having the required time to implement PREA protocols especially since the agency provided her with an assistant.</p> <p data-bbox="240 1240 499 1267">Site Review Observation:</p> <p data-bbox="240 1299 1485 1429">During the tour of the facility, the Auditor witnessed PREA Zero-tolerance, Audit Notices and Crisis Intervention posters in day rooms in each building. PREA posters included information on third party, internal and external reporting to include contact and address information for advocates. During the tour and an informal interview with a resident, the resident demonstrated the facility Kiosk system where PREA information, to include reporting, could be located on the resident Kiosk.</p> <p data-bbox="240 1514 1485 1809">(a) The Larimer County Criminal Justice Services PAQ states the facility mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract. The facility has a written policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment. The policy includes sanctions for those found to have participated in prohibited behaviors. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of residents. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, page 1, section Purpose, states: To educate staff, define a process for responding to Prison Rape Elimination Act (PREA) related incidents, and communicate a culture of zero tolerance for sexual abuse and sexual harassment within Criminal Justice Services (CJS).</p> <p data-bbox="240 1895 1485 2056">The agency provided a Larimer County Alternative Sentencing Division Alternative Sentencing Department Work Release Offender Handbook. Page 21, section 14, #4., states, "Prison Rape Elimination Act and personal safety: Larimer County Criminal Justice Services is committed to a safe and secure environment for all of its residents and staff. There is ZERO TOLERANCE for any form of neglect, abuse, harassment, assault, bullying and sexual abuse. All reports will be taken seriously and thoroughly investigated."</p>

The agency provided a Larimer County Community Corrections Resident Guidebook. Page 14 speaks to Larimer County Criminal Justice Services Division being committed to a safe and secure environment; Zero Tolerance for any form of neglect, abuse, harassment, assault bullying and sexual abuse. The establishment zero tolerance for sexual behaviors between offenders, staff/volunteers/visitors regardless of whether such conduct was consensual. Options to report both internally and externally, to include contact phone numbers.

(b) The Larimer County Criminal Justice Services PAQ states The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities. The position of the PREA Coordinator in the agency's organizational structure.

The agency provided a Larimer County Criminal Justice Services Organizational chart. This agency employee a Program Manager who serves as the PREA Manager and a Training and PREA Coordinator to oversee the implementation of PREA standards for the agency.

115.212	<b>Contracting with other entities for the confinement of residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. PREA Coordinator</li> </ol> <p>During the pre-audit phase, the PREA Coordinator conveyed the agency did not have privatized contracts.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states agency does not contract with private agencies for confinement services of their residents.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 100.110.158, Staffing, dated 8.12.2019
3. ASD 2021 Staffing Schedule
4. August 2021 Staff Schedule
5. Larimer County Criminal Justice Services Division, Alternative Sentencing Department Daily Shift Log, dated 1.2.2020
6. 2022 Annual Staffing Plan
7. Larimer County Criminal Justice Services CJS Directors Meeting Minutes, dated 7.20.2021

Interviews:

1. PREA Coordinator
2. Random residents
3. Targeted residents
4. Random staff

Staff and residents interviewed could attest to supervisory staff conducting unannounced rounds, each day, often occurring multiple times per day. Staff attested to completing rounds at random times and through random direction.

(a) The Larimer County Criminal Justice Services PAQ states the facility requires the facility to develop, document and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against abuse. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents is 403. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents on which the staffing plan was predicated is 403.

Larimer County Criminal Justice Services Policy and Procedures 100.110.158, Staffing, page 1, section Purpose, states, "To provide for regular review of personnel needs, through an analysis of offender to staff ratio's, availability of services, legal requirements, program goals, client needs, program development and other identified factors. Tor provide a structure for securing and maintain Temporary Workers, and to encourage the teamwork of permanent staff and temporary workers in order to provide adequate staffing and quality services."

The agency provided a 2021 schedule demonstrating an in-depth coverage schedule to include all positions in each department and area of its programs.

(a) The Larimer County Criminal Justice Services PAQ states the facility documents each time the staffing plan is not complied with, the facility documents and justifies deviations. The facility had four deviations from the required ratios of their staffing plan. Primary reasons for deviations were COVID and other staff illnesses.

The agency provided a Larimer County Criminal Justice Services Policy and Procedures 100.110.158, Staffing Daily Shift Log. The Shift Log includes daily communication and emails, which speaks to:

- Staffing, when below minimum staffing;
- Urgent maintenance issues
- Total counts of clients by gender and assigned areas for clients, during particular shifts;
- Area Activity
- o Incoming/Outgoing
- o Minor Rule Violations
- o Major Rule Violations
- o Revocations
- o Individual Client notes
  - Electronic Home Detention
- o Pass-On
- o Total County, during particular shifts:
  - Area Activity
- o Incoming/Outgoing
- o Minor Rule Violations
- o Major Rule Violations
- o Revocations
- o Individual Client notes
  - Workenders
  - Total counts of clients by gender and assigned areas for clients, during particular shifts;
  - Area Activity
- o Job Site Information for clients by job site
- o Minor Rule Violations
- o Revocations
- o 1st Weekend Revocations
- o Individual Client notes

(c) The Larimer County Criminal Justice Services PAQ states at least once every year the facility, reviews the staffing plan to see whether adjustments are needed in (1) the staffing plan, (2) prevailing staffing patterns, (3) the deployment of video monitoring systems and other monitoring technologies, or (4) the allocation of facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan

The agency provided Larimer County Criminal Justice Services CJS Directors Meeting Minutes. The minutes demonstrates the annual approval of the staffing plan for year 2021. Staffing plan approval areas include:

- Annual Review:
  - o Staffing Plan for LCCC and ASD facilities;
  - o Allocation of Resources to include staffing patterns, improvement recruitment and increase of applications for security and other positions;

- o Deployment of Video Monitoring Systems;
- o PREA requirements for running criminal background checks on contract employees, every four to five years;
- o Replacement of the camera system, newly installed cameras and where;
- o Deployment of remote monitoring devices;
- o Adding a new phone system with monitoring capabilities;
- o Ongoing resources to ensure continued staffing levels.

The facility provided a 2022 Staffing Plan. The Staffing Plan includes the following components:

- Assessment of Needs
- Documentation of relief and compliance with the plan
- Staffing Plan reviews and updates
- Supervision and monitoring
- Prevalence of substantiated and unsubstantiated PREA allegations
- Other relevant factors
- Regulatory Requirements
- Findings of Staffing Inadequacy
- Staff schedule
- Video Surveillance
- Staffing Plan Deviations
- Staffing Plan reviews and updates

115.215	<b>Limits to cross-gender viewing and searches</b>
	<p data-bbox="240 147 766 174"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1469 882" style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.109.130, Offender Searches, dated 4.27.15</li> <li>3. Larimer County Criminal Justice Services Policy and Procedures 1.00.410.103, Transgender Gender Reassignment/Intersex Offenders, dated 4.27.2015</li> <li>4. Larimer County Criminal Justice Services Policy and Procedures 1.00.130.115, Facility Monitoring, dated 12.5.2018</li> <li>5. Larimer County Criminal Justice Services Division PREA Training – New Employees, Interns, Volunteers and Contract Workers, not dated</li> <li>6. Larimer County Criminal Justice Services Division Mini Academy Training Roster/Attendees, dated 11.12.2019</li> <li>7. Larimer County Criminal Justice Services Division Mini Academy Training Roster/Attendees, dated 6.22-24.2020</li> <li>8. Larimer County – Community Corrections Department Unannounced Facility Checks</li> <li>9. Searches / Contraband Training PowerPoint, not dated</li> </ol> <p data-bbox="240 972 352 999">Interviews:</p> <ol data-bbox="240 1030 475 1285" style="list-style-type: none"> <li>1. Random residents</li> <li>2. Targeted residents</li> <li>3. Random staff</li> <li>4. Intake staff</li> <li>5. PREA Coordinator</li> </ol> <p data-bbox="240 1317 1489 1473">Interviews with staff demonstrated cross-gender searches had been trained; however, staff interviewed stated cross-gender searches would entail female staff would search a resident with female genitalia and a male staff would search residents with male genitalia, unless the resident requested otherwise. In addition, all residents reported their initial and any subsequent searches were completed respectfully. Random staff interviewed stated all pat searches are completed in camera view and are recorded.</p> <p data-bbox="240 1563 499 1590">Site Review Observation:</p> <p data-bbox="240 1621 1482 1715">During the tour of the facility the Auditor observed the check in check out area. In this area, residents leaving the facility may access their personal lockers and retrieve their cell phones. Upon returning to the facility return their cell phones to their personal locker, talk into breathalyzer and or could be given a random urinalysis.</p> <p data-bbox="240 1805 1489 1993">(a) Larimer County Criminal Justice Services PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their Residents. In the past 12 months the facility has conducted zero cross-gender strip or cross-gender visual body cavity searches of residents. In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents was zero. In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents that did not involve exigent circumstances or were performed by non-medical staff was zero.</p> <p data-bbox="240 2083 1393 2145">Larimer County Criminal Justice Services Policy and Procedures 1.00.109.130, Offender Searches, page 1, section Definitions, states,</p>



o "Strip Search: A thorough search during which an offender is required to remove clothing. A visual inspection of the body is conducted which includes but is limited to the genitals, buttocks, anus and breast. CJSD staff are not authorized to perform this type of search.

o Body Cavity Search: An internal visual, manual, or instrument inspection of an offender's annual or vaginal cavity. CJSD staff are not authorized to perform this type of search."

(b) Larimer County Criminal Justice Services PAQ states the facility does not permit cross-gender pat-down searches of female residents, absent exigent circumstances. The facility does not restrict female residents' access to regularly available programming or other outside opportunities in order to comply with this provision. The number of pat-down searches of female residents that were conducted by male staff was zero. The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s) was zero. The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s) was zero.

Larimer County Criminal Justice Services Policy and Procedures 1.00.410.103, Transgender Gender Reassignment/Intersex Offenders, page 2, section Searches, states, "Transgender/gender reassignment/intersex offenders are searched by the staff member of the gender requested by the offender. At no time shall a search of an offender's person be used for the sole purpose of determining that offender's gender or genital status."

(a) Larimer County Criminal Justice Services PAQ states the facility policy does require that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified as cross-gender strip searches and body cavity searches are not allowed.

Larimer County Criminal Justice Services Policy and Procedures 1.00.109.130, Offender Searches, page 3, section V., states, "When there is an imminent threat to the security of the facility or if valuable evidence may be lost, based on articulated reasonable suspicion, and the same or requested gender staff is not available, a cross gender pat search is permitted. All ross gender searches must be documented to justify the extenuating circumstances."

(d) Larimer County Criminal Justice Services PAQ states the facility has implemented policies and procedures that enable residents 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 (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing.

Larimer County Criminal Justice Services Policy and Procedures 1.00.130.115, Facility Monitoring, page 2, section E., state, "In residential bathroom areas, through the use of shower/changing stall curtains and toilet stall doors, offenders are afforded a level of privacy so that staff and other offenders cannot view offenders' breasts, buttocks or genital when showering, performing bodily functions or changing clothing, except in exigent circumstances when the offender's safety or the facility's security is at risk and CJS staff must respond to these areas."

Page 1, section III A., states, "Security staff shall conduct walkthrough status checks at least fourteen (14) times per 24-hour day at random intervals across all shifts. Seven (7) of this walkthroughs must include a headcount.

Page 1, section III B., state, "Supervisory staff shall conduct random, unannounced facility checks at least one (1) time per calendar quarter, with each shift checked at least (1) time per year."

Page 2, section F, states, "In normal non-emergency circumstances, CJS staff shall announce their presence when entering a residential bathroom area of an opposite gender."

The agency provided Larimer County – Community Corrections Unannounced Facility Checks. These checks speak to:

- Date and time of each check;
- Staff conducting the check;
- Personnel on Duty at Time of Check;
- Verification of Head Count
- Observations – in detail; and
- Improper/Inappropriate Conditions Noted and Actions Taken – in detail;

(e) The Larimer County Criminal Justice Services PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status. Such searches (described in 115.215(e)-1) occurred in the past 12 months was zero.

Larimer County Criminal Justice Services Policy and Procedures 1.00.410.103, Transgender Gender Reassignment/Intersex Offenders, page 2, section Searches, states, "Transgender/gender reassignment/intersex offenders are searched by a staff member of the gender requested by the offender. At no time shall a search of an offender's person be used for the sole purpose of determining that offender's gender or genital status."

During the pre-audit phase, the PREA Coordinator stated although 'unknown genital status' wording is not used in agency policy, staff would ask them during the intake processes if the status is not identified in any other paperwork or the computer system.

(f) The Larimer County Criminal Justice Services PAQ states 100 percent of all security staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex residents in a professional and respectful manner, consistent with security needs.

The agency provided Larimer County Searches / Contraband Training PowerPoint. The PowerPoint topics include:

- 4th Amendment
- Pat Down Searches and Procedure
- Reasonable Suspicion Search
- Personal Property Searches
- Room/Bunk Searches and Procedure
- Vehicles Search and Procedure
- Facility Searches/K9 Searches
- Technology Searches
- Contraband
- Videos

The agency provided Larimer County Criminal Justice Services Division Mini Academy Training Roster/Attendees, dated 11.12.2019 and 6.22.2020.

Due to the agency requirement of 14 walkthrough and documentation requirements, the facility exceeded the standard requirements.

**115.216 Residents with disabilities and residents who are limited English proficient**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, dated 7.7.2014
3. Voiance – Agency Interpreter Services, Client Set Up form, dated 2.10.2014
4. Criminal Justice Services Mini Academy Presentation of PREA, dated 9.1.2021

Interviews:

1. Targeted residents
2. Correctional Case Specialist
3. PREA Coordinator

During interviews with staff, each stated residents were not used for translation services. Barriers were not apparent during interviews and or on the facility tour. Of the residents interviewed, one interview was conducted with a mandarin speaking resident in the presence of her Correctional Case Specialist, at her request. The interview revealed the resident understood PREA protocols at the facility. The Correctional Case Specialist reported using Volance, when needed, and the language line resources are used when she works with the mandarin speaking resident.

(a) The Larimer County Criminal Justice Services PAQ states the agency has established procedures to provide disabled residents 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.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Vulnerable PREA Populations Residents, page 6, section III., states, "CJS shall take appropriate steps to ensure that residents with disabilities and/or limited English shall have equal opportunity to benefit from CJS efforts to prevent, detect, and respond to sexual and sexual harassment in its facilities. These steps shall include, but are not limited to:" (paraphrased: ADA, auxiliary aids, and illiteracy)

The agency provided a Criminal Justice Services Mini Academy Presentation of PREA. This PowerPoint is presented to clients upon intake into the program. Slide 19 speaks to "Resident education must be provided to ALL clients: Including those who are Limited-English proficient, deaf, visually impaired, those with limited reading skills, or who are otherwise disabled."

(b) The Larimer County Criminal Justice Services PAQ states the agency has established procedures to provide residents with limited English proficiency 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. The facility addresses compliance in provision (a) of this standard.

The agency provided Voiance – Agency Interpreter Services, Client Set Up form. The form demonstrates an agreement for interpretive services exists between the agency and Voiance.

(c) The Larimer County Criminal Justice Services PAQ states the agency policy prohibits use of resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or

the investigation of the resident's allegations. If YES, the agency or facility documents the limited circumstances in individual cases where resident interpreters, readers, or other types of resident assistants are used. In the past 12 months, the number of instances where resident interpreters, readers, or other types of resident assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the resident's safety, the performance of first-response duties under § 115.264, or the investigation of the resident's allegations was zero.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 6, section B., states, "When requested or needed, staff shall contact a supervisor to access a qualified interpreter service. Language translation shall be provided at no cost to the offender."

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 6, section III. A. 1., states, "Providing appropriate communication services. In normal, non-emergency circumstances, CJS shall furnish appropriate auxiliary aids or services within the guidelines of the ADA (Americans with Disabilities Act) to requesting individuals who have auditory or speech limitations for any necessary communication. An accompanying adult (visitor) or resident (offender) may interpret only in an emergency involving an imminent threat to the safety or welfare of an individual or the public when a qualified interpreter is not immediately available.

115.217	<b>Hiring and promotion decisions</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1461 824" style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, dated 7.20.2021</li> <li>3. Larimer County Criminal Justice Services Policy and Procedures 1.00.110.154, Hiring, dated 7.20.2021</li> <li>4. Larimer County Criminal Justice Services Policy and Procedures 1.00.110.153, Transfer, Promotion, &amp; Flexing Opportunities, dated 9.21.2020</li> <li>5. Larimer County Criminal Justice Services Policy and Procedures 1.00.110.159, Contract Workers, dated 6.25.2014</li> <li>6. Larimer County Criminal Justice Services Policy and Procedures 1.00.110.152, Personnel Records, dated 05.29.2018</li> <li>7. Larimer County – Criminal Justice Services Pre-Employment Integrity Interview, dated 6.2019</li> <li>8. Larimer County – Criminal Justice Services, Director Memo to all Employees, dated 1.6.2022</li> </ol> <p data-bbox="240 913 352 940">Interviews:</p> <ol data-bbox="240 972 703 999" style="list-style-type: none"> <li>1. Office Manager – Human Resources staff</li> </ol> <p data-bbox="240 1025 1485 1155">Interviews with the Office Manager – Human Resources staff demonstrated applicants determined to have been convicted of sexual abuse or sexual harassment charges were screened out during the application review process. All though these practices were currently in place for new hire employees, the facility had yet to implement this practice for promoted staff. See agency practice modifications in provision (e) of this standard.</p> <p data-bbox="240 1245 499 1272">Site Review Observation:</p> <p data-bbox="240 1303 1485 1393">During review of the 20 staff personnel files reviewed, this Auditor noted institutional references are completed for each new applicant. Files reviewed demonstrated each had criminal and applicable background checks conducted upon hire and every five years of employment thereafter.</p> <p data-bbox="240 1482 1485 1711">(a) The Larimer County Criminal Justice Services PAQ states agency policy prohibits hiring or promoting anyone who may have contact with residents and prohibits enlisting the services of any contractor who may have contact with residents who: (1) 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); (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</p> <p data-bbox="240 1800 1417 1890">Larimer County Criminal Justice Services Policy and Procedures 1.00.110.153, Transfer, Promotion, &amp; Flexing Opportunities, page 3, section C. states, “A review for criminal history and any incidents of sexual misconduct shall be conducted prior to a candidate being offered a transfer or promotional position.”</p> <p data-bbox="240 1980 1477 2141">Larimer County Criminal Justice Services Policy and Procedures 1.00.110.154, Hiring, page 2, section 1., third paragraph, states, “In accordance with the Prison Rape Elimination Act (PREA), all positions posted for application, whether internal or external, shall screen applicants for a past history of sexual misconduct in the workplace and in the community. These questions are covered in the applications and/or integrity interview process and be ‘yes’ or ‘no’ questions. Any ‘yes’ answer that indicates a history of such misconduct shall automatically disqualify the applicant from employment with the</p>

agency.”

The agency provided the Larimer County – Criminal Justice Services Pre-Employment Integrity Interview. Page 6, section 10, questions, state:

- Have you ever engaged in sexual abuse or misconduct in a prison, jail, lock-up, community confinement facility, juvenile facility, or other institution?
- Have you ever been convicted of engaging or attempting to engage in sexual activity in the community that was facilitated by force, overt or implied acts of force, coercion, or if the victim did not consent or was not capable of consenting or refusing?
- Have you ever been adjudicated in a civil case or an administrative hearing (at work or elsewhere) where you were found guilty of, or admitted to, any or all of the actions described in the previous two questions?
- Have you ever engaged in or been investigated criminally or administratively for sexual harassment either in the workplace or the community?

(b) The Larimer County Criminal Justice Services PAQ states agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents.

Compliance can be found in provision (a) of this standard.

(c) The Larimer County Criminal Justice Services PAQ states the agency policy requires that before it hires any new employees who may have contact with residents, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes 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. In the past 12 months, the number of persons hired who may have contact with residents who have had criminal background record checks is 38.

Larimer County Criminal Justice Services Policy and Procedures 1.00.110.154, Hiring, page 3, in the fifth paragraph, language states, “The Hiring Coordinator, Business Operations Manager or Director-approved designee runs Criminal History, Warrant, and Driver History Checks in CCIC/NCIC and Person Search in Colorado Courts Data Access (PAS).

Page 6, section 5., states, “Background Investigator shall make best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse/harassment or any resignation during a pending investigation of an allegation of sexual abuse/harassment. For each previous institutional employer, the Investigator shall use PREA Inquire Form – Prior Institutional Employers (Form #LCCJS-86).”

(d) The Larimer County Criminal Justice Services PAQ states the agency policy requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with residents. In the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with residents is four.

Larimer County Criminal Justice Services Policy and Procedures 1.00.110.159, Contract Workers, page 2, fifth paragraph, states, “Under no circumstances shall a Contract Worker who has engaged in or has been convicted or adjudicated of sexual misconduct, within in an institution or in the community, be granted access to a CJSD facility. Additionally, any contractor who engages in such activity shall be reported to the appropriate licensing and law enforcement agencies.”

(e) The Larimer County Criminal Justice Services PAQ states the agency policy requires that either criminal background record checks be conducted at least every five years for current employees and contractors who may have contact with residents or that a system is in place for otherwise capturing such information for current employees.

The agency provided Larimer County – Criminal Justice Services, Director Memo to all Employees. The memo states, “During the pre-audit phase the Auditor noted with the agency current policy language did include this provisions required language. During the onsite review, the agency determined the following language would be added to policy language and provided a memo, from the Director, addressed to Criminal Justice Services (CJS) Employees.

Please note that we had a successful PREA audit and staff, and residents demonstrated their knowledge and understanding of our zero-tolerance policy of sexual abuse and harassment. As with any audit, we have a few areas we can improve on and language what will be added to policy and procedures within 90 days. Please review and start practicing the following items. If you have any questions, please don’t hesitate to contact Nikki Henneman.

1) 115.217 – “During the promotion process for existing employees, we will review and consider sexual misconduct criminal convictions, civil or administrative cases.”

Larimer County Criminal Justice Services Policy and Procedures 1.00.110.159, Contract Workers, page 2, first paragraph, states, “Any Contract Worde for Larimer County or CJSJ who has direct, potentially unsupervised contact with the offender population, shall be required to undergo a criminal background (criminal history) check prior to their beginning work in any CJSJ facility or on CJSJ grounds. Additionally, a criminal background check will be done, at a minimum, once every four years for any such Contract Worker whose contract or period of service is renewed or continuously in place during that time period.”

(f) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 9, section B-D, state,

B. “Staff who receive a report of sexual abuse or sexual harassment perpetrated by an offender or CJS worker shall:

1. Separate the victim from the alleged perpetrator to protect the victim and prevent violence; and
2. Promptly intervene on the victim’s behalf to ensure prompt medical and psychological assistance including an assessment for potential risk of suicide.

C. CJS Workers shall report all suspected and reported sexual abuse by another CJS Worker or offender to a PREA Manager, by utilizing the PREA Incident Response Manual.

D. Any CJS Worker who fails to report an allegation, coerces or threatens another person to submit inaccurate, incomplete or untruthful information, or acts in a retributive manner toward any party to a PREA report may face disciplinary action, up to and including termination.

E. If staff suspects a co-worker or other agency personnel of sexual abuse or sexual harassment toward an offender, they are required to report such suspicion. This report may be made to the CJS Director, the Department Director, the PREA Coordinator, the CJS Victim Witness Specialist, the Sexual Assault Victim Advocate Center, or privately to Law Enforcement (independent of reporting within the chain of command).”

(g) The Larimer County Criminal Justice Services PAQ states Agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Larimer County Criminal Justice Services Policy and Procedures 1.00.110.154, Hiring, page 2, first paragraph, states, “Any material omission or the provision of materially false information by a candidate during the hiring process is grounds for negative termination of the candidate’s application. If the material omission and/or materially false information is discovered during employment, it will be cause for corrective or adverse action consistent with Larimer County Policy Procedures.”



(h) The Background Investigator shall make best efforts to contact all incoming reference requests.

115.218	<b>Upgrades to facilities and technology</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>Larimer County Criminal Justice Services PAQ</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>PREA Coordinator</li> </ol> <p>The PREA Coordinator attested to the facility not going under modifications during the last audit cycle. However, the facility was excited to report they are currently being renovated to include more office space and prepare for a new women's facility. The PREA Coordinator was aware the Staffing Plan would be updated to include security modifications, once renovations were complete.</p> <p>Site Review Observation:</p> <p>Cameras were found to be throughout both the Community Corrections and Alternative Sentencing Department buildings. Cameras did not have access into resident dorms.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states the agency has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.</p>

115.221	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, dated 7.7.2021</li> <li>3. Larimer County Criminal Justice Services First Responder Checklist for a PREA Incident, dated 02.21</li> <li>4. Memorandum of Understanding, Sexual Assault Victim Advocate Center, dated 08.20.2018</li> <li>5. Resumes of Qualified Staff</li> <li>6. Memorandum of Understanding, Larimer County Sheriff, dated 11.2.2021</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Residents</li> <li>2. Targeted Residents</li> <li>3. Random staff</li> <li>4. Specialized staff</li> <li>5. Advocate</li> <li>6. PREA Coordinator</li> <li>7. Agency Investigator</li> </ol> <p>Interviews with all residents and staff interviewed demonstrated all were clearly aware of reporting protocols for sexual harassment and abuse. Of those interviewed, each were comfortable reporting internally and understood the processes for reporting externally.</p> <p>Every staff interviewed clearly articulated first responder duties to include protecting, preserving and reporting. When each were asked where this information was located, responses included postings on the bulletin boards in the day rooms and available on the resident kiosks. The investigator clearly articulated protocols for investigation processes and each demonstrated immediate action for sexual harassment and sexual abuse allegations.</p> <p>Site Review Observation:</p> <p>There was one Administrative investigation and seven criminal investigations reported in the last 12 months. Of those eight investigations, documentation supports victims and perpetrators were separated immediately following the report of allegations. Review of investigations demonstrated each were completed through a fair and timely process.</p> <p>During the tour of the facility, various residents addressed the PREA Coordinator demonstrating they not only knew her, but felt comfortable approaching her, as well.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states the agency/facility is responsible for conducting administrative sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). The agency/facility is not responsible for conducting criminal sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). The facility has a current memorandum of understanding with the Larimer County Sheriff's</p>

Office. When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 9, section VIII. C., states, "CJS shall ensure that standard evidence protocols are met anytime that a crime scene, victim, or perpetrator may have usable evidence pertinent to an investigation of alleged sexual abuse or sexual harassment. These protocols are outlined in the first Responder Manual."

The agency provided a Larimer County Criminal Justice Services First Responder Checklist for a PREA Incident. This checklist demonstrates pertinent information is documented, such as:

- Date/Time of Incident
- Date/Time of Report
- Victim Name/DOB
- Assailant Name
- Initial Contact – Secure/Separate Victim in a Safe, Confidential Location
- Does Victim Need Immediate Emergency Medical or Mental Health Care
- Internal contact personnel information
- Threshold Questioning at Initial Contact
- Assess Security Threat Level
- Documentation of Offering of Sexual Assault Victim Advocate (SAVA)
- Direction on creating a detailed case note and forwarding to the PREA team
- Staff name/date and time of report

(b) The Larimer County Criminal Justice Services PAQ states the protocol being developmentally appropriate for is not applicable as the facility does not house youthful offenders. The protocol was adapted from or otherwise based on the most recent edition of the DOJ'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.

(c) The Larimer County Criminal Justice Services PAQ states the facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic medical examinations are offered without financial cost to the victim. Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations. The facility documents efforts to provide SANEs or SAFEs. The number of forensic medical exams conducted during the past 12 months is zero. The number of SANEs/SAFEs during the past 12 months was zero. The number of exams performed by a qualified medical practitioner during the past 12 months was zero.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 5, section V. 1. B., states, "This service will be made available at no cost to victims unless the victim is charged with false reporting of the incident."

(d) The Larimer County Criminal Justice Services PAQ states the facility attempts to make available to the victim a victim advocate from a rape crisis center, either in person or by other means. The efforts are documented. If and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member.

The agency provided Memorandum of Understanding (MOU), Sexual Assault Victim Advocate Center. The MOU is dated 8.20.2018 and has a five-year term from September 1, 2018 through August 31, 2023, and was executed upon the written agreement.

On 12.5.2021 at 5:00 pm, this Auditor phoned SAVA – The Sexual Assault Victim Advocate Center at 970.472.4200. Sara F. the operator answered the call within half a ring. Once I introduced myself and explained why I was making the call, Sara F. explained to me she would take the callers information, to include a call back number and either have a counselor return his/her call and attempt to connect them immediately to a counselor. Upon asking the Operator about next steps, I was transferred to a Counselor. In less than 15 seconds I was connected with a Counselor, and I verified she knew why I was calling. The Counselor, Caroline M., informed me she was an Intern/Volunteer and explained she would speak with the caller and ensure they were connected with any services the caller needed. The Counselor went on to state SAVA would accompany the caller through a forensic interview, exam and the police reporting process, if the caller so desired. The Auditor made the Counselor aware she did a nice job answering the questions, thanked her for her time and ended the call.

(e) The Larimer County Criminal Justice Services PAQ states a qualified staff or community member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information and referrals.

(f, h) The Larimer County Criminal Justice Services PAQ states the agency is responsible for conducting Administrative investigations.

The agency provided a Memorandum of Understanding (MOU) with the Larimer County Sheriff, dated 11.2.2021. Page 2, section IV. A., states, This MOU shall become effective upon signature of the Parties and shall remain in full effect until such time as mutually agreed upon by the Parties and the Board of County Commissioners for Larimer County.

Page 1, section C of the MOU, states, "The Parties will maintain ongoing communication and exchange of information to ensure the management of offenders, integrity of record-keeping, supervision and operation of Alternative Sentencing Programs and the Jail.

Page 1, Section D., states, "To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecution.

115.222	<b>Policies to ensure referrals of allegations for investigations</b>
	<p data-bbox="240 147 766 174"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1425 448" style="list-style-type: none"> <li data-bbox="240 331 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="240 389 1425 448">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> </ol> <p data-bbox="240 533 352 560">Interviews:</p> <ol data-bbox="240 591 483 792" style="list-style-type: none"> <li data-bbox="240 591 483 618">1. Random Residents</li> <li data-bbox="240 649 483 676">2. Targeted Residents</li> <li data-bbox="240 707 424 734">3. Random staff</li> <li data-bbox="240 766 483 792">4. Facility Investigator</li> </ol> <p data-bbox="240 824 1469 1084">Resident and staff interviews demonstrated each can report incidents of sexual abuse and sexual harassment through the grievance process, verbally reporting to a staff, using the Kiosk system, using their personal cell phones or telling a family member. Each stated being comfortable reporting incidents of sexual harassment and assault. Staff reported separating victims and suspects, accessing the 'Green PREA Book' where scripts for questioning is maintained and then reporting allegations of sexual abuse or sexual harassment to their Program Manager. Random staff reported taking limited information from victims and reporting that information to the PREA Coordinator and or Program Manager who then reports to the Agency Investigator. The agency Investigator interviewed described investigation protocols and addressing investigations as soon as possible, if not immediately.</p> <p data-bbox="240 1169 499 1196">Site Review Observation:</p> <p data-bbox="240 1227 1489 1321">Of the investigations reviewed, each were reported timely with the victim and perpetrator separated immediately following the allegation, when reported within the timeframe of the incident. Each investigation was completely thoroughly and within 30 days.</p> <p data-bbox="240 1406 1489 1572">(a) The Larimer County Criminal Justice Services PAQ states the agency ensures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had 12 allegations of sexual abuse and sexual harassment that were received. In the past 12 months 12 allegations resulted in an Administrative Investigation. In the past 12 months five allegations were referred for criminal investigation and each has been completed.</p> <p data-bbox="240 1657 1477 1823">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 1, section Policy, states, "Criminal Justice Services (CJS) has zero tolerance for sexual abuse and sexual harassment toward offenders. CJS recognizes offenders who have experienced sexual abuse and sexual harassment as crime victims. CJS strictly prohibits such conduct and shall immediately respond to allegations, fully investigate reported incidents, pursue disciplinary action, and refer for investigation and prosecution of those who engage in such conduct."</p> <p data-bbox="240 1908 1489 2136">(b) The Larimer County Criminal Justice Services PAQ states the agency has a policy that requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 4, section D. 1, states, "Criminal Investigations shall be conducted by the Larimer County Sheriff's Office (LCSO), as outlined in the MOU between CJS and LCSO." The agency's policy regarding the referral of allegations of sexual abuse or sexual harassment for criminal investigation is published on the agency website at <a href="https://www.larimer.org/cjs/prea">https://www.larimer.org/cjs/prea</a>.</p>

(c) This provision is not applicable as Larimer County Criminal Justice Services is responsible for conducting criminal investigations.

Through interviews and the site observation of the 'Green Book' every employee interviewed spoke to the PREA script and corresponding documentation to be completed for each reported allegation, the facility exceeds this standards requirement.

115.231	<b>Employee training</b>
<b>Auditor Overall Determination:</b> Meets Standard	
<b>Auditor Discussion</b>	
<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policies and Procedures 1.00.140.101, Prison Rape Elimination Act, dated 7.20.2021</li> <li>3. Larimer County Criminal Justice Services PREA Training-New Employees, Interns, Volunteers and Contract Workers – PREA Staff Refresher Training PowerPoint, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random staff</li> <li>2. Specialized staff</li> <li>3. Office Manager - Human Resource staff</li> <li>4. Training and PREA Coordinator</li> </ol> <p>Interviews with random staff demonstrated each were aware of and received initial and annual PREA training. Interviews with specialized staff demonstrated each had received training mandated for all employees.</p> <p>Site Observation:</p> <p>Review of the 20 personnel files demonstrated random staff have received initial and annual training; and investigator and mental health staff had received training also mandated by this standard.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states the agency trains all employees who may have contact with residents on the agency's zero-tolerance policy for sexual abuse and sexual harassment. Larimer County Criminal Justice Services Policies and Procedures 1.00.140.101, Prison Rape Elimination Act, page 10, section VIII. A. 1-9, states, "A Comprehensive PREA Training Course shall be conducted for all CJS Workers or other persons having direct, unsupervised contact with offenders. All CJS Workers shall sign the PREA Employee-Intern-Volunteer-Contractor Acknowledgement (Form #LCCJS-40) and receive documented PREA training upon hire and annually thereafter. Training will include, but is not limited to the following:</p> <ol style="list-style-type: none"> <li>1. Review of this policy</li> <li>2. Prevention, investigation and prosecution of sexual abuse and sexual harassment</li> <li>3. Recognition of sexual abuse/harassment, predatory offenders, potential victims and/or staff involvement</li> <li>4. Facility procedures on sharing confidential information</li> <li>5. Reporting procedures</li> <li>6. An offender's right to be free from sexual abuse and sexual harassment</li> <li>7. Offender and employee rights to be free from retaliation for reporting sexual abuse</li> <li>8. Dynamics of sexual abuse in confinement</li> <li>9. Common reactions of sexual abuse victims"</li> </ol> <p>The agency provided a Larimer County Criminal Justice Services PREA Training-New Employees, Interns, Volunteers and Contract Workers. This PowerPoint includes the following training topics:</p>	



- Purpose and Scope
- Goals and Objectives for trainees to understand, identify, act and report;
- Sexual Abuse and Sexual Harassment
- Zero Tolerance Policy
- Sexual Abuse Definitions
- Sexual Harassment Definitions
- Legal Definitions of Sexual Conduct in a Correctional Setting
- Job Ramifications
- Behaviors and Actions to Avoid
- Warning Signs
- Offender Access to PREA Information (Disabilities and Limited English)
- Reporting

(b) The Larimer County Criminal Justice Services PAQ states training is tailored to the gender of the residents at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training. Compliance can be found in provision (a) of this standard.

(c) The Larimer County Criminal Justice Services PAQ states between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and harassment. The frequency with which employees who may have contact with residents receive refresher training on PREA requirements annually.

The agency provided a Larimer County Criminal Justice Services PREA Training-New Employees, Interns, Volunteers and Contract Workers. This PowerPoint is used for annual refresher training.

(d) The Larimer County Criminal Justice Services PAQ states the agency documents that employee who may have contact with residents understand the training they have received through employee signature or electronic verification

115.232	<b>Volunteer and contractor training</b>
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policies and Procedures 1.00.140.101, Prison Rape Elimination Act, dated 7.20.2021
3. Larimer County Criminal Justice Services PREA Training – New Employees, Interns, Volunteers and Contract Workers PowerPoint, not dated

Interviews:

1. Food Service Contractor

The Food Service Contractor demonstrated she and contract food services staff had been trained on the agency zero tolerance procedures. Contract staff could speak to how areas of food services are monitored and how food and supplies are stored and stacked to ensure constant observation while residents assisted with food service operations.

(a) The Larimer County Criminal Justice Services PAQ states all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. The number of volunteers and contractors, who may have contact with residents, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response is 71.

Larimer County Criminal Justice Services Policies and Procedures 1.00.140.101, Prison Rape Elimination Act, page 10, section B. states, "An Annual PREA Refresher Course shall be mandatory for all CJS Workers or other persons who have direct, unsupervised offender contact. All attendees shall sign the PREA Employee-Intern-Volunteer-Contractor Acknowledgement (Form #LCCJS-40) annually at the completion of this training."

The agency provided a Larimer County Criminal Justice Services PREA Training – New Employees, Interns, Volunteers and Contract Workers PowerPoint. The PowerPoint includes the following training topics:

- Purpose and Scope: PREA is a Federal Legislation
- PREA Standards
- Sexual Abuse Definitions
- Sexual Harassment Definitions
- Zero Tolerance Policy
- Reporting
- Behaviors and Actions to Avoid

(b) The Larimer County Criminal Justice Services PAQ states the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with residents. All volunteers and contractors who have contact with residents have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

(c) The Larimer County Criminal Justice Services PAQ states the agency maintains documentation confirming that volunteers and contractors who have contact with residents understand the training they have received. Compliance can be found in provision (a) of this standard.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policies and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021
3. Larimer County Criminal Justice Services PREA Offender Brochure, dated 10.2020

Interviews:

1. Random Residents
2. Targeted Residents
3. Random staff
4. Intake staff
5. Training and PREA Coordinator

Interviews with the 18 random and six targeted residents, each reported their knowledge on PREA, reporting options to staff, third parties and or phone numbers posted on Zero-tolerance Posters throughout the facility. During the tour, a resident mentioned watching the PREA video upon admission had given him nightmares. During formal interviews with staff and residents concluded they also were quite nervous during intake and suggested perhaps a different introduction to PREA. The Auditor recommended perhaps the facility consider a different PREA education during intake.

Site Observation:

Of the 24 resident files reviewed, each demonstrated evidence of PREA education within 72 hours of intake.

(a) The Larimer County Criminal Justice Services PAQ states residents receive information at time of intake about the zero-tolerance policy, how to report incidents or suspicions of sexual abuse or harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The number of residents admitted during past 12 months who were given this information at intake was 1285.

Larimer County Criminal Justice Services Policies and Procedures 1.00.140.101 Prison Rape Elimination Act, page 4, section II.A. 1-4 states, "During offender orientations, all offenders will receive information about sexual abuse and sexual harassment Information provided will include:

1. PREA Offender Brochure (Form #LCCJS-12) on self-protection, prevention and intervention
2. How to access treatment and counseling
3. Reporting procedures
4. Consequences of false allegations"

The agency provided a Larimer County Criminal Justice Services PREA Offender Brochure. The brochures include the following topics:

- Zero Tolerance Policy for prohibited sexual behavior

- Community Corrections/ASD Zero Tolerance Policy
- Types of Sexual Abuse and Sexual Harassment
- Acts of Sexual Abuse and Sexual Harassment
- Reporting Procedures for Prohibited Sexual Behavior
- Treatment and Counseling
- Seeking Relief for Retaliation
- Disciplinary Actions for Making False Allegations

(a) The Larimer County Criminal Justice Services PAQ states the facility provides residents who are transferred from a different community confinement facility with refresher information referenced in 115.233(a)-1. The number of residents transferred from a different community confinement facility during the past 12 months was one. The number of residents transferred from a different community confinement facility, during the past 12 months, who received refresher information was one. The agency states residents who are transferred from a different community confinement facility will receive the above described brochure, a resident handbook and watch the PREA Video.

(c) The Larimer County Criminal Justice Services PAQ states Resident PREA education is available in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled and those who have limited reading skills.

Larimer County Criminal Justice Services Policies and Procedures 1.00.140.101 Prison Rape Elimination Act, page 6, section A. 1-2, state, "CJS shall take appropriate steps to ensure that residents with disabilities and/or limited English shall have equal opportunity to benefit from CJS efforts to prevent, detect, and respond to sexual abuse and sexual harassment in its facilities. These steps shall include, but are not limited to:

1. Providing appropriate communication services. In normal, non-emergency circumstances, CJS shall furnish appropriate auxiliary aids or services within the guidelines of the ADA (Americans with Disabilities Act) to requesting individuals who have auditory or speech limitations for any necessary communication. An accompanying adult (visitor) or resident (offender) may interpret only in an emergency involving an imminent threat to the safety or welfare of an individual or the public when a qualified interpreter is not immediately available.
2. All PREA-related material and information for offenders will be provided in formats or through methods that ensure effective communication with offenders with disabilities or any degree of illiteracy which may preclude the offender from fully understanding the content of written PREA materials. Residents (offenders) shall not be used for this purpose."

(d) The Larimer County Criminal Justice Services PAQ states the agency maintains documentation of resident participation in PREA education sessions.

(e) The Larimer County Criminal Justice Services PAQ states the agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, resident handbooks, or other written formats.

115.234	<b>Specialized training: Investigations</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 435 300">Document Review:</p> <ol data-bbox="242 329 1430 539" style="list-style-type: none"> <li data-bbox="242 329 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="242 387 1430 450">2. Larimer County Criminal Justice Services Policy and Procedures 1.00140.101, Prison Rape Elimination Act, dated 7.20.2021</li> <li data-bbox="242 479 1430 539">3. Certificates of Completion, PREA: Investigating Sexual Abuse in a Confinement Setting, dated 11.26.2018 through 8.31.2021</li> </ol> <p data-bbox="242 624 352 654">Interviews:</p> <ol data-bbox="242 683 692 826" style="list-style-type: none"> <li data-bbox="242 683 480 712">1. Facility Investigator</li> <li data-bbox="242 741 692 770">2. Office Manager – Human Resource staff</li> <li data-bbox="242 799 604 828">3. Training and PREA Coordinator</li> </ol> <p data-bbox="242 857 1430 920">Interviews with the investigator and the Human Resource staff demonstrated investigators have completed specialized investigator training course.</p> <p data-bbox="242 1005 1409 1068">(a) The Larimer County Criminal Justice Services PAQ states agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.</p> <p data-bbox="242 1153 1437 1216">Larimer County Criminal Justice Services Policy and Procedures 1.00140.101, Prison Rape Elimination Act, page 4, section D. 2, “Administrative investigations shall be conducted by designated trained in-house PREA investigators.”</p> <p data-bbox="242 1301 1469 1395">(b) “Specialized training includes techniques for interviewing sexual abuse victims, Miranda and Garrity warnings, evidence collection in confinement settings and criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p data-bbox="242 1480 1497 1574">(c) The Larimer County Criminal Justice Services PAQ states the agency maintains documentation showing that investigators have completed the required training. The number of investigators currently employed who have completed the required training is five.</p> <p data-bbox="242 1659 1465 1722">The agency provided four Certificates of Completion, PREA: Investigating Sexual Abuse in a Confinement Setting and one record of a staff completing Interview and Interrogation training.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, dated 7.20.2021
3. Larimer County Criminal Justice Services PREA Employee – Intern – Contractor Acknowledgement Training

Interviews:

1. Victim Witness Specialist
2. Training and PREA Coordinator

The facility does not have nor contract with medical or mental health personnel; however, the facility does have an advocate office at the facility. The advocate could articulate how she would ensure the resident understood the processes, how to notify the proper authorities, to include SANE/SAFE hospital being used.

Site Observation:

During file review of the Victim Witness Specialist training record, she had completed specialized medical and mental health training to include training mandated for all employees.

(a) The Larimer County Criminal Justice Services PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The number of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy is 25, to include 18 Clinicians, two advocates and five case managers. The percent of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy is 100.

Larimer County does not have nor does the agency contract with medical and mental health staff Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 10 states, "A Comprehensive PREA Training Course shall be conducted for all CJS Workers or other persons having direct, unsupervised contact with offenders. All CJS Workers shall sign the PREA Employee-Intern-Volunteer-Contractor Acknowledgement (Form #LCCJS-40) and receive documented PREA training upon hire and annually thereafter. Training will include, but is not limited to the following:

1. Review of this policy
2. Prevention, investigation and prosecution of sexual abuse and sexual harassment
3. Recognition of sexual abuse/harassment, predatory offenders, potential victims and/or staff involvement
4. Facility procedures on sharing confidential information
5. Reporting procedures
6. An offender's right to be free from sexual abuse and sexual harassment
7. Offender and employee rights to be free from retaliation for reporting sexual abuse
8. Dynamics of sexual abuse in confinement
9. Common reactions of sexual abuse victims"

(b) The Larimer County Criminal Justice Services PAQ states the agency medical staff at this facility do not conduct forensic medical exams.

(c) The Larimer County Criminal Justice Services PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training.

The agency provided documentation for three contracted medical/mental health staff.



115.241	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, dated 7.20.2021</li> <li>3. Larimer County Criminal Justice Services PREA Screening, dated 6.2020</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random residents</li> <li>2. Targeted residents</li> <li>3. Correctional Case Specialist</li> </ol> <p>Interviews with the Correctional Case Specialist demonstrated that risk assessments are completed with each resident within 72 hours of intake; however, within 24 hours is her goal. Residents attested to answering questions on the risk assessment and staff "doing a really good job making sure we feel safe here."</p> <p>Site Observation:</p> <p>During review of 24 resident files, this Auditor noted each resident had received screening within 72 hours of admission, primarily on the day of admission. Of the 24 files reviewed, all but one resident was reassessed within 30 days of admission. The one resident who had not received an assessment was found to have transferred from work release to community connections.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states the agency has a policy that requires screening (upon admission to a facility or transfer to another facility) for risk of sexual abuse victimization or sexual abusiveness toward other residents.</p> <p>Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 6-7, section IV.D., states, "All offenders shall be screened using a standardized screening instrument (PREA Screening, Form #LCCJS-10) to assess potential for abusiveness and/or victimization. This instrument shall assess at a minimum:</p> <ol style="list-style-type: none"> <li>1. Physical, mental, and/or developmental disabilities</li> <li>2. Physical build/stature</li> <li>3. Previous incarcerations</li> <li>4. Violent/non-violent criminal history</li> <li>5. Prior sex offense convictions</li> <li>6. Lesbian, Gay, Bisexual, Transgender, Questioning and Intersex (LGBTQI) status</li> <li>7. Previous sexual victimization</li> <li>8. Offender's own perception of risk/vulnerability</li> <li>9. Prior acts of sexual abuse</li> <li>10. Prior convictions for violent crime</li> </ol>

11. History of institutional violence and/or sexual abuse

(b) The Larimer County Criminal Justice Services PAQ states the agency policy requires that residents be screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake. The number of residents entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility was 1232.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 7, section IV. E. 1, states, "All offenders shall be given a full assessment, utilizing an approved, standardized screening instrument:

1. Initially, within 72 hours of intake; and a risk assessment review is required by 30 days of intake.

(c-e) The Larimer County Criminal Justice Services PAQ states the risk assessment is conducted using an objective screening instrument.

The agency provided a Larimer County Criminal Justice Services PREA Screening. This screening includes:

- Victim/Vulnerability Factors
- Victim Vulnerability
- o Non victim; known victim, possible victim
  - Aggressive/Abusiveness Factors
  - Aggressive/Abusiveness
- o Non victim; known victim, possible victim
  - Risk factor information forwarded to staff responsible for room, work, education and programming assignments.
  - Name
  - Age
  - Physical stature
  - Mental or developmental disability
  - Physical disability
  - First incarceration
  - History of sex offense convictions – against an adult or child
  - Lesbian/Gay/Bi-sexual/Transgender/Gender non-conforming or Intersex
  - History of sexual victimization – consider juvenile and adult experiences
  - Offender's perception of vulnerability
  - History of institutional violence or sexual abuse
  - Gang affiliation
  - Other factors not addressed that may influence risk

(e) The Larimer County Criminal Justice Services PAQ states the policy requires that the facility reassess each resident's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the resident's arrival at the facility, based

upon any additional, relevant information received by the facility since the intake screening. The number of residents entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake was 699, 100%.

Policy compliance can be found in provision (b) of this standard.

(f) The Larimer County Criminal Justice Services PAQ states the policy requires that a resident's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 7, section IV. E. 2-4, states, "All offenders shall be given a full assessment, utilizing an approved, standardized screening instrument:

2. Every 6 months thereafter, if known to be transgender or intersex
3. Annually, if not known to be transgender or intersex
4. Anytime new or additional information is received that could bear on the offender's risk of sexual victimization or abuse."

(g) The Larimer County Criminal Justice Services PAQ states the policy prohibits disciplining residents for refusing to answer (or for not disclosing complete information related to) the questions regarding: (a) whether or not the resident has a mental, physical, or developmental disability; (b) whether or not the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) Whether or not the resident has previously experienced sexual victimization; and (d) the resident's own perception of vulnerability.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 7, section IV. G., states, "Offenders may not be disciplined for refusing to answer, or for not disclosing complete information, in response to screening questions regarding:

1. Mental, physical, or developmental disabilities
2. Sexual orientation, gender, or gender identity
3. Whether or not they have experienced previous sexual victimization
4. Own perception of vulnerability"

(h) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, Prison Rape Elimination Act, page 7, section IV. F., states, "Information obtained from these screening instruments shall be used to make informed, individualized decisions regarding each offender's housing and programs placement. This information shall be limited in dissemination only to those staff who make housing and program placement decisions."

115.242	<b>Use of screening information</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1445 539" style="list-style-type: none"> <li data-bbox="240 331 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="240 389 1425 450">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li data-bbox="240 481 1445 539">3. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.103 Transgender-Gender Reassignment-Intersex Offenders, dated 4.27.2015</li> </ol> <p data-bbox="240 629 352 656">Interviews:</p> <ol data-bbox="240 687 572 826" style="list-style-type: none"> <li data-bbox="240 687 477 714">1. Targeted residents</li> <li data-bbox="240 745 472 772">2. Random residents</li> <li data-bbox="240 804 572 831">3. Correctional Case Specialist</li> </ol> <p data-bbox="240 862 1465 983">Interviews with the Correctional Case Specialist demonstrated once resident risks are entered into the agency system the risk is shared with appropriate departments and not the reason for the risk level. The Correctional Case Specialist stated staff who manage each room are all very cautious of PREA status and what risk levels are placed in each dorm. Residents interviewed reporting feeling safe and believing they were not housed based on identification.</p> <p data-bbox="240 1072 1465 1171">(a) The Larimer County Criminal Justice Services PAQ states the agency/facility uses information from the risk screening required by §115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p data-bbox="240 1261 1493 1382">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 7, section IV. F., states, "Information obtained from these screening instruments shall be used to make informed, individualized decisions regarding each offender's housing and programs placement. This information shall be limited in dissemination only to those staff who make housing and program placement decisions."</p> <p data-bbox="240 1471 1493 1632">(b) The Larimer County Criminal Justice Services PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each resident. Throughout Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 7, section IV. F., the section speaks ensuring the safety of each resident. Section A. states, "Staff must be alert to situations in which sexual abuse or sexual harassment by an offender or CJS worker might occur and be capable of identifying the following indicators:</p> <ol data-bbox="240 1664 770 1803" style="list-style-type: none"> <li data-bbox="240 1664 770 1691">1. Overly friendly behavior of staff and/or offenders</li> <li data-bbox="240 1722 716 1749">2. Exchange of money, favors, privileges, etc.</li> <li data-bbox="240 1780 663 1807">3. Security Threat Group (gang) activity"</li> </ol> <p data-bbox="240 1897 1493 1986">Section C., states to "CJS shall identify, assess, and manage offenders with special needs, including those who are potentially vulnerable or dangerous, to assist in providing safe housing, adequate protection, and programmatic resources to meet their needs."</p> <p data-bbox="240 2076 1477 2134">Section D., states, "All offenders shall be screened using a standardized screening instrument (PREA Screening, Form #LCCJS-10) to assess potential for abusiveness and/or victimization."</p>

Section F. states, "Information obtained from these screening instruments shall be used to make informed, individualized decisions regarding each offender's housing and programs placement. This information shall be limited in dissemination only to those staff who make housing and program placement decisions."

Each individual section attesting to the assurance of resident safety within the agency programs.

(c) The Larimer County Criminal Justice Services PAQ states the agency/facility makes housing and program assignments for transgender or intersex residents in the facility on a case-by-case basis.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.103 Transgender-Gender Reassignment-Intersex Offenders, page 2, section Housing, states, "Prior to receiving a housing assignment, staff will meet with the offender regarding their views and concerns about safety. An agreement as to the housing arrangements shall be made with serious consideration given to the offender's choice and preference in housing assignments."

(d) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.103 Transgender-Gender Reassignment-Intersex Offenders, page 2, section Housing, states, "The agency shall not place transgender and intersex offenders in dedicated facilities, units, or wings solely on the basis of such identification or status unless such placement is in a dedicated facility, wing, or unit established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such residents."

(e) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.103 Transgender-Gender Reassignment-Intersex Offenders, page 2, section Housing, states,

Changes to any offender's housing, program, and common area assignments may be made according to this, or any other follow-up, assessments. In all cases, transgender and intersex offenders will be afforded the opportunity to perform bodily functions and to shower separately from others."

(f) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.103 Transgender-Gender Reassignment-Intersex Offenders, page 2, section Housing, states, "Offenders who have completed their gender reassignment surgery shall be housed with offenders of their reassigned gender. Placement in specialized housing is re-evaluated upon offender request.

If separate housing is not possible due to overall facility population, housing area usage, or other management concerns; or is deemed not in the best interests of the offender, all care shall be taken to minimize the risk to transgender and intersex offenders by conducting a thorough risk assessment of all potential co-habitants of the assigned room, shared common areas, and programs. This risk assessment shall include a review of all co-habitants' PREA screens, as well as a review of any security, health, and/or safety concerns related to the placement."

115.251	<b>Resident reporting</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 432 300">Document Review:</p> <ol data-bbox="240 331 1485 766" style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li>3. Memorandum of Understanding between Larimer County and Sexual Assault Victim Advocate Center, dated 8.20.2018</li> <li>4. Larimer County Criminal Justice Services Division Alternate Sentencing Department, Work Release Offender Handbook, dated 4.2021</li> <li>5. Larimer County Community Corrections Resident Handbook, dated 6.2021</li> <li>6. Larimer County Criminal Justice Services PREA Offender Brochure, dated, 10.2020</li> <li>7. Larimer County Criminal Justice Services First Responder Checklist for a PREA Incident, dated 02.2021</li> </ol> <p data-bbox="240 855 352 882">Interviews:</p> <ol data-bbox="240 913 475 1052" style="list-style-type: none"> <li>1. Random residents</li> <li>2. Targeted residents</li> <li>3. Random staff</li> </ol> <p data-bbox="240 1084 1485 1276">Staff and residents were comfortable reporting verbally to any staff. As reported, residents demonstrated being comfortable talking with the PREA Coordinator. Each resident interviewed stated he or she would report to staff verbally and or through the numbers posted in the units. PREA posters with internal, external and advocate information were posted in each day room and throughout highly trafficked areas of the facility. Random staff interviewed stated if a resident wanted to use a staff phone to call an advocate or the hotline, they would offer a private office for the phone call and monitor from the outside of the office to ensure watch for signs of distress and offer assistance, if requested.</p> <p data-bbox="240 1366 1433 1460">Each of the eight allegations of sexual harassment and or sexual abuse were reviewed during the on-site phase. Of the residents remaining at the facility who reported sexual harassment and or abuse allegations believed the facility acted promptly and were notified of the outcome of the investigation.</p> <p data-bbox="240 1550 427 1576">Site Observations:</p> <p data-bbox="240 1608 1485 1666">During the tour an informal interview, from a resident, demonstrated residents could report via the resident kiosk. In addition, residents are able to use their cell phones if in an approved cell phone area.</p> <p data-bbox="240 1756 1485 1881">(a) The Larimer County Criminal Justice Services PAQ states the agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other residents or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p data-bbox="240 1971 1437 2029">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section C. 1-3, state:</p> <ol data-bbox="240 2060 1062 2145" style="list-style-type: none"> <li>1. Report the incident to a staff member.</li> <li>2. Utilize the offender grievance procedure as outlined in the offender handbook.</li> </ol>

3. Contact the CJS Victim Witness Specialist for confidential reporting.

(b) The Larimer County Criminal Justice Services PAQ states the agency provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section C. 4., states, "Contact the Sexual Assault Victim Advocate (SAVA) Center for confidential reporting.

The agency provided a Memorandum of Understanding between Larimer County and Sexual Assault Victim Advocate Center, dated 8.20.2018. The Memorandum of Understanding is clear in its purpose to provide quality services to services to offenders residing with the programs under Larimer County Criminal Justice Services.

The agency provided Larimer County Criminal Justice Services Division Alternate Sentencing Department, Work Release Offender Handbook. Page 21, second paragraph, states, "You have the right to be safe from sexual assault and unwanted sexual advances. If you have been a victim of prohibited sexual behavior, have witnessed or have knowledge of an incident of prohibited sexual behavior, you may report it verbally or in writing in one of the following ways:

- Verbally tell a staff member of any incident
- Contact the ASD Victim Services Coordinator at 970-980-2688
- Contact Sexual Assault Victims Advocate Center (SAVA) at 970-472-4204

All reports will be kept confidential and reviewed by the PREA Manager."

Larimer County Community Corrections Resident Handbook, page 13, section Prison Rape Elimination Act, third paragraph, states, "You have the right to be safe from sexual assault and unwanted sexual advances. If you have been a victim of prohibited sexual behavior, have witnessed, or have knowledge of an incident of prohibited sexual behavior, you may report it verbally or in writing in one of the following ways:

- Verbally tell a staff member of any incident
- Contact the LCCC Victim Services Coordinator at 970-498-7503
- Contact Sexual Assault Victims Advocate Center (SAVA) at 970-472-4204

All reports will be kept confidential and reviewed by the PREA Manager

Larimer County Criminal Justice Services PREA Offender Brochure, page 2, section E., states, "

For Confidential Counseling contact: "Sexual Assault Victims Advocacy Center (SAVA) 4812 S. College Ave, Fort Collins, CO 80525, (970) 472-4204"

(c) The Larimer County Criminal Justice Services PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties.

On December 12, 2021, at 6:18 pm, the Auditor phone the Colorado Department of Corrections TIP line at 1.877.362.8477. The message prompted the Auditor to press 1 for English. Press 2 to leave a TIP for the Inspector General Office, mailbox number 03981 pass code 2987. Press 2 to leave a message. The Auditor left a message introducing herself and the reason for the call. On December 13, 2021, the message was responded to by a member of the Colorado Department of Corrections

explaining the call would be returned to whomever left the message and proper notifications would be made once the staff was aware of the situation details.

(d) The Larimer County Criminal Justice Services PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 9, section E., states, "If staff suspects a co-worker or other agency personnel of sexual abuse or sexual harassment toward an offender, they are required to report such suspicion. This report may be made to the CJS Director, the Department Director, the PREA Coordinator, the CJS Victim Witness Specialist, the Sexual Assault Victim Advocate Center, or privately to Law Enforcement (independent of reporting within the chain of command)."

The agency provided a Larimer County Criminal Justice Services First Responder Checklist for a PREA Incident. The Checklist includes the following components:

- Date/Time of Incident – Date/Time of Report
- Victim Name and date of birth / Assailant Name and date of birth
- Initial Contact – Secure/Separate Victim in a Safe, Confidential Location
- Contacting of the PREA Manager or designee
- Threshold Questioning at Initial Contact
- Assess Security Threat Level (Assailant Danger/Risk to Others)
- Offering of a sexual abuse pamphlet and mental health follow appointment



115.252	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.21.2020</li> <li>3. Larimer County Criminal Justice Services PREA Incident – SART Response Form, dated 07.2021</li> <li>4. Larimer County – Criminal Justice Services, Director Memo to all Employees, dated 1.6.2022</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Residents</li> <li>2. Targeted Residents</li> <li>3. PREA Coordinator</li> </ol> <p>Residents interviewed were aware of the grievance procedures and understood they could complete a grievance. The targeted resident who submitted the grievance spoke to having a timely response, although he did not agree with the outcome, the grievance was responded to properly.</p> <p>Site Observation:</p> <p>One grievance was filed in the last 12 months and the grievance was responded to appropriately and timely.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states the agency has an administrative procedure for dealing with resident grievances regarding sexual abuse. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section C. 2. c-d, state,</p> <p>c. "For the purposes of PREA reporting, a grievance regarding an incident of sexual abuse and sexual harassment shall, for all intents and purposes, be treated as a PREA report and shall be handled and expedited in full accordance with PREA guidelines established herein. Nothing in existing policy and procedure regarding offender grievance procedures shall preclude any part of established PREA response protocols from being activated.</p> <p>d. All grievances regarding sexual abuse and sexual harassment shall be immediately screened, and first response protocols initiated, by the recipient of the grievance in the same manner as any other PREA Report. If the grievance alleges an immediate or imminent threat, the First Responder shall take immediate action commensurate with the safety and security needs of the reporting offender and the facility. Specifically, such action must include immediately notifying the facility's PREA Manager (in person or by phone call) to ensure that all necessary response steps are taken."</p> <p>(b) The Larimer County Criminal Justice Services PAQ states the agency policy or procedure allows a resident to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section b., states, "If a grievance is submitted alleging an incident that falls under PREA guidelines:</p> <ol style="list-style-type: none"> <li>i. No timeline shall be established that limits the time period in which a grievance may be submitted.</li> <li>ii. No informal resolution process shall be required prior to accepting and responding to the grievance.</li> </ol> <p>(c) The Larimer County Criminal Justice Services PAQ states the agency's policy and procedure allows a resident to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency's</p>

policy and procedure requires that a resident grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section b. iii, states, "The grievance shall not be submitted and/or directed to a staff member who is the subject of a complaint."

(d) The Larimer County Criminal Justice Services PAQ states the agency policy and procedure requires that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months, the number of grievances filed that alleged sexual abuse was one. In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed was one.

The agency provided Larimer County – Criminal Justice Services, Director Memo to all Employees. The memo states, "During the pre-audit phase the Auditor noted with the agency current policy language did include this provisions required language. During the onsite review, the agency determined the following language would be added to policy language and provided a memo, from the Director, addressed to Criminal Justice Services (CJS) Employees.

Please note that we had a successful PREA audit and staff, and residents demonstrated their knowledge and understanding of our zero-tolerance policy of sexual abuse and harassment. As with any audit, we have a few areas we can improve on and language what will be added to policy and procedures within 90 days. Please review and start practicing the following items. If you have any questions, please don't hesitate to contact Nikki Henneman.

- 1) 115.252 (d)-1 – "CJS shall 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.
- 2) 115.252 (d)-1 - Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents.
- 3) 115.252 (f) – 1 – If a resident is subject to a substantial risk of imminent sexual abuse, CJS will initiate procedures for filing an emergency grievance.
- 4) 115.252 (f)-2 – Regarding CJS established procedures for the finding of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse, this will not exceed 48 hours."

(e) The Larimer County Criminal Justice Services PAQ states agency policy and procedure permits third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of residents. Agency policy and procedure requires that if a resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the resident's decision to decline. The number of grievances alleging sexual abuse filed by residents in the past 12 months in which the resident declined third-party assistance, containing documentation of the resident's decision to decline was one.

(f) The Larimer County Criminal Justice Services PAQ states the agency has a policy and established procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. Agency policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires an initial response within 48 hours. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was zero. The agency's policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires that a final agency decision be issued within 5 days. The number of grievances alleging substantial risk of imminent sexual abuse filed in the past 12 months that reached final decisions within 5 days was zero.

section b., states, "All grievances regarding sexual abuse and sexual harassment shall be immediately screened, and first response protocols initiated, by the recipient of the grievance in the same manner as any other PREA Report. If the grievance alleges an immediate or imminent threat, the First Responder shall take immediate action commensurate with the safety and security needs of the reporting offender and the facility. Specifically, such action must include immediately notifying the facility's PREA Manager (in person or by phone call) to ensure that all necessary response steps are taken."

Policy compliance can be found in provision (d) of this standard.

(g) The Larimer County Criminal Justice Services PAQ states the agency has a written policy that limits its ability to discipline a resident for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the resident filed the grievance in bad faith. In the past 12 months, the number of resident grievances alleging sexual abuse that resulted in disciplinary action by the agency against the resident for having filed the grievance in bad faith was zero.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section D., states, "Unfounded, deliberately malicious, or false reports by offenders or other parties will result in disciplinary action or criminal charges."

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021
3. Larimer County Criminal Justice Services PREA Offender Brochure, dated 10.2020
4. Larimer County Criminal Justice Services PREA Incident – SART Response Form, dated, 7.2021
5. Larimer County Criminal Justice Services Division Alternate Sentencing Department Work Release Offender Handbook, dated 4.2021
6. Larimer County Community Corrections Resident Handbook, not dated
7. Memorandum of Understanding with Sexual Assault Victim Advocate Center, dated 8.20.2018
8. Larimer County – Criminal Justice Services, Director Memo to all Employees, dated 1.6.2022

Interviews:

1. Random residents
2. Targeted residents
3. Random staff
4. Victim Witness Specialist

Staff and residents interviewed informally and formally were aware of outside advocates; however, many spoke to the onsite victim witness specialist and her caring nature.

(a) The Larimer County Criminal Justice Services PAQ states the facility provides residents with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides residents with access to such services by giving residents mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, state, or national victim advocacy or rape crisis organizations. The facility provides residents with access to such services by enabling reasonable communication between residents and these organizations in as confidential a manner as possible.

The agency provided a Larimer County Criminal Justice Services Division Alternate Sentencing Department Work Release Offender Handbook. Page 21, first paragraph states, “You have the right to be safe from sexual assault and unwanted sexual advances. If you have been a victim of prohibited sexual behavior, have witnessed or have knowledge of an incident of prohibited sexual behavior, you may report it verbally or in writing in one of the following ways:

- Verbally tell a staff member of any incident
- Contact the ASD Victim Services Coordinator at 970-980-2688
- Contact Sexual Assault Victims Advocate Center (SAVA) at 970-472-4204

The agency provided a Larimer County Community Corrections Resident Handbook, page 13, section Prison Rape Elimination Act, “You have the right to be safe from sexual assault and unwanted sexual advances. If you have been a victim

of prohibited sexual behavior, have witnessed, or have knowledge of an incident of prohibited sexual behavior, you may report it verbally or in writing in one of the following ways: • Verbally tell a staff member of any incident • Contact the LCCC Victim Services Coordinator at 970-498-7503 • Contact Sexual Assault Victims Advocate Center (SAVA) at 970-472-4204”

The agency provided a Larimer County Criminal Justice Services PREA Offender Brochure. Page two, section E., states, “For Confidential Counseling contact: Sexual Assault Victims Advocacy Center (SAVA) 4812 S. College Ave, Fort Collins, CO 80525, (970) 472-4204”

(a) The Larimer County Criminal Justice Services PAQ states the facility informs residents, prior to giving them access to outside support services, of the extent to which such communications will be monitored.

The agency provided Larimer County – Criminal Justice Services, Director Memo to all Employees. The memo states, “During the pre-audit phase the Auditor noted with the agency current policy language did include this provisions required language. During the onsite review, the agency determined the following language would be added to policy language and provided a memo, from the Director, addressed to Criminal Justice Services (CJS) Employees.

Please note that we had a successful PREA audit and staff, and residents demonstrated their knowledge and understanding of our zero-tolerance policy of sexual abuse and harassment. As with any audit, we have a few areas we can improve on and language what will be added to policy and procedures within 90 days. Please review and start practicing the following items. If you have any questions, please don't hesitate to contact Nikki Henneman.

7) 115.253 (b)-1 – CJS will add to the resident brochure, that prior to giving them access to outside support services, we will let them know the extent to which such communications will be monitored.”

(b) The Larimer County Criminal Justice Services PAQ states the agency or facility maintains memorandum of understanding (MOUs) or other agreements with community service providers that are able to provide residents with emotional support services related to sexual abuse.

The agency provided a Memorandum of Understanding between Larimer County Criminal Justice Services and the Sexual Assault Victim Center. The Purpose and Scope, states, “To provide quality services to service offenders residing with the programs under Larimer County Criminal Justice Services in adherence to PREA Standards.”

115.254	<b>Third party reporting</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 435 300">Document Review:</p> <ol data-bbox="242 329 1426 506" style="list-style-type: none"> <li data-bbox="242 329 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="242 387 1426 448">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li data-bbox="242 477 775 506">3. Agency web address: <a href="https://www.larimer.org/cjs">https://www.larimer.org/cjs</a></li> </ol> <p data-bbox="242 591 352 620">Interviews:</p> <ol data-bbox="242 649 475 848" style="list-style-type: none"> <li data-bbox="242 649 475 678">1. Random residents</li> <li data-bbox="242 707 475 736">2. Targeted residents</li> <li data-bbox="242 766 424 795">3. Random staff</li> <li data-bbox="242 824 456 853">4. Supervisory staff</li> </ol> <p data-bbox="242 882 1457 943">Residents and staff interviewed demonstrated their reporting knowledge of third party reporting stating that resident family members, friends and or legal counsel could report sexual harassment or sexual abuse allegations.</p> <p data-bbox="242 1028 419 1057">Site Observation:</p> <p data-bbox="242 1086 1481 1146">During tours of visitation areas PREA Zero-tolerance flyers were present. Flyers included contact information and instruction for third party reports.</p> <p data-bbox="242 1232 1490 1328">(a) The Larimer County Criminal Justice Services PAQ states the agency or facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. The agency or facility publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents.</p> <p data-bbox="242 1413 842 1442">The agency web address is <a href="https://www.larimer.org/cjs/prea">https://www.larimer.org/cjs/prea</a></p>

115.261	<b>Staff and agency reporting duties</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 432 300">Document Review:</p> <ol data-bbox="240 331 1425 506" style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li>3. Larimer County – Criminal Justice Services, Director Memo to all Employees, dated 1.6.2022</li> </ol> <p data-bbox="240 595 352 622">Interviews:</p> <ol data-bbox="240 654 480 963" style="list-style-type: none"> <li>1. Random residents</li> <li>2. Targeted residents</li> <li>3. Random staff</li> <li>4. Specialized staff</li> <li>5. Facility Investigator</li> <li>6. PREA Coordinator</li> </ol> <p data-bbox="240 994 1481 1057">Interviews with each staff and residents interviewed demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment.</p> <p data-bbox="240 1146 427 1173">Site Observations:</p> <p data-bbox="240 1205 1469 1294">Staff reporting documentation of resident information, incident reports and investigations being completed in the facility database demonstrated reports of allegation are addressed timely. Review of investigations demonstrated allegations were investigated timely and thoroughly, regardless of the allegation reported for sexual harassment and or abuse.</p> <p data-bbox="240 1384 1474 1581">(a) The Larimer County Criminal Justice Services PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy retaliation against residents or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p data-bbox="240 1671 1477 1760">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section VI.A., states, "CJS Workers with reasonable cause to suspect sexual abuse or sexual harassment by an offender or CJS worker shall immediately activate PREA protocols and utilize the PREA Incident Response Manual."</p> <p data-bbox="240 1850 1469 1975">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section 4.a., states, "Offenders who report such conduct are protected from retaliation as outlined in CJS Policy #100.110.204 Professional Conduct, and shall be entitled to additional protection measures, if warranted, to ensure that no such retaliation takes place. These measures include, but are not limited to:</p> <ol data-bbox="240 2007 624 2145" style="list-style-type: none"> <li>i Changed housing assignments</li> <li>ii Facility transfers</li> <li>iii Additional status checks/watches</li> </ol>

- iv Removal of contact with alleged staff or resident abusers
- v Emotional support services through in-house advocate or SAVA”

(b) The Larimer County Criminal Justice Services PAQ states, apart from reporting to designated supervisors or officials and designated state or local services agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

The agency provided Larimer County – Criminal Justice Services, Director Memo to all Employees. The memo states, “During the pre-audit phase the Auditor noted with the agency current policy language did include this provisions required language. During the onsite review, the agency determined the following language would be added to policy language and provided a memo, from the Director, addressed to Criminal Justice Services (CJS) Employees.

Please note that we had a successful PREA audit and staff, and residents demonstrated their knowledge and understanding of our zero-tolerance policy of sexual abuse and harassment. As with any audit, we have a few areas we can improve on and language what will be added to policy and procedures within 90 days. Please review and start practicing the following items. If you have any questions, please don’t hesitate to contact Nikki Henneman.

7) 115.261 – Apart from reporting to designated supervisors or officials and designated state or local services agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation and other security and management decisions.”

(c) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section, G., states, “Therapists and other medical and mental health care providers are required to report PREA-qualifying incidents as outlined in this policy, and they shall inform offenders under their care of their duty to report such information.”

(d) This provision is not applicable as the Larimer County Criminal Justice Services does not provide services for youthful offenders.

(e) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 3, section 3.a-b., states, “An investigation will be initiated upon receipt of any allegation of sexual abuse and sexual harassment. An investigation will be initiated in response to any:

- i Anonymous Report
- ii 3rd Party Report
- iii Staff Report
- iv Offender Report”



115.262	<b>Agency protection duties</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1425 506" style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li>3. Larimer County Criminal Justice Services First Responder Checklist, dated 02.2021</li> </ol> <p data-bbox="240 595 352 622">Interviews:</p> <ol data-bbox="240 654 480 792" style="list-style-type: none"> <li>1. Targeted residents</li> <li>2. Facility Investigator</li> <li>3. PREA Coordinator</li> </ol> <p data-bbox="240 824 1481 913">Interviews with the PREA Coordinator and facility investigators demonstrated the facility staff act promptly and responds properly at the discovery of an incident. Residents interviewed who had reported allegations of abuse, concurred allegations were responded to promptly and thoroughly and were satisfied with the facilities response protocols.</p> <p data-bbox="240 1003 1481 1128">(a) The Larimer County Criminal Justice Services PAQ states when the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident. In the past 12 months, the number of times the agency or facility determined that a resident was subject to a substantial risk of imminent sexual abuse was zero.</p> <p data-bbox="240 1218 1481 1344">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 9, section VII. A.1-2, states, "At the direction of the PREA Manager or designee, First Responders and subsequent responders shall initiate and complete the First Responder Checklist for a PREA Incident (form #LCCJS-45) and any other applicable forms located in the PREA Incident Response Manual and ensure designated staff follow appropriate security procedures.</p> <ol data-bbox="240 1375 1481 1527" style="list-style-type: none"> <li>1. Upon learning that an offender is subject to a substantial risk of imminent sexual abuse, the First Responder shall take immediate action to protect the at-risk offender and secure the facility.</li> <li>2. Depending on the First Responder's role as a CJS Worker, the First Responder may seek assistance from an appropriate CJS employee or supervisor, to complete first response forms and properly carry-out the protective action."</li> </ol> <p data-bbox="240 1617 1358 1675">The agency provided a Larimer County Criminal Justice Services First Responder Checklist. The checklist demonstrates pertinent information is documented, such as:</p> <ul data-bbox="240 1706 1011 2136" style="list-style-type: none"> <li>· Date/Time of Incident</li> <li>· Date/Time of Report</li> <li>· Victim Name/DOB</li> <li>· Assailant Name</li> <li>· Initial Contact – Secure/Separate Victim in a Safe, Confidential Location</li> <li>· Does Victim Need Immediate Emergency Medical or Mental Health Care</li> <li>· Internal contact personnel information</li> <li>· Threshold Questioning at Initial Contact</li> </ul>

- Assess Security Threat Level
- Documentation of Offering of Sexual Assault Victim Advocate (SAVA)
- Direction on creating a detailed case note and forwarding to the PREA team
- Staff name/date and time of report

115.263	<b>Reporting to other confinement facilities</b>
	<p data-bbox="240 147 766 174"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1426 564" style="list-style-type: none"> <li data-bbox="240 331 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="240 389 1426 448">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li data-bbox="240 479 1257 506">3. Larimer County Criminal Justice Services Prior Institutional PREA Incident Report, dated 06.2019</li> <li data-bbox="240 537 1214 564">4. Larimer County – Criminal Justice Services, Director Memo to all Employees, dated 1.6.2022</li> </ol> <p data-bbox="240 654 352 680">Interviews:</p> <ol data-bbox="240 712 954 739" style="list-style-type: none"> <li data-bbox="240 712 954 739">1. Director of Criminal Justice Services and Criminal Justice Planning</li> </ol> <p data-bbox="240 770 1426 860">The interview with the Director demonstrated that she was aware that upon receiving an allegation that a resident was sexually abused while confined at another facility, she had the responsibility to notify the head of the facility where the allegation occurred.</p> <p data-bbox="240 949 1493 1106">(a,b) The Larimer County Criminal Justice Services PAQ states the agency has a policy requiring that, upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. During the past 12 months, the number of allegations the facility received that a resident was abused while confined at another facility was three.</p> <p data-bbox="240 1196 1493 1397">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 7, section H, states, “Any information obtained during screening that indicates the offender may have been the victim or perpetrator of sexual abuse in a previous facility shall be immediately passed on to a PREA Manager or the PREA Coordinator, who shall notify the appropriate Department Director, who shall in turn notify the appropriate office of the facility at which the incident allegedly occurred. Such notification shall occur within 72 hours of when the information was initially reported, and it shall be documented via email or written report. Such documentation shall be forwarded to the PREA Coordinator for retention.”</p> <p data-bbox="240 1487 1458 1545">(a) The Larimer County Criminal Justice Services PAQ states the agency or facility documents that it has provided such notification within 72 hours of receiving the allegation.</p> <p data-bbox="240 1635 944 1662">Policy compliance can be found in provision (a and b) of this standard.</p> <p data-bbox="240 1751 1426 1841">The agency provided a Larimer County Criminal Justice Services Prior Institutional PREA Incident Report and notification documents to support such communication. The Larimer County Criminal Justice Services Prior Institutional PREA Incident Report includes internal first responder reporting protocols. In addition, the report includes:</p> <ul data-bbox="240 1872 833 2011" style="list-style-type: none"> <li data-bbox="240 1872 783 1899">· The facility where the incident allegedly occurred;</li> <li data-bbox="240 1930 820 1957">· Details of PREA Incident as reported by the offender;</li> <li data-bbox="240 1989 833 2016">· Submission of report to the Agency PREA Coordinator</li> </ul> <p data-bbox="240 2105 1477 2163">The agency provided a letter to the facility where the incident allegedly occurred. This letter is signed by the Larimer County Criminal Justice Services Director.</p>

The agency provided an email communication from the Agency PREA Coordinator to the Program Director, informing her of the PREA Institutional report.

(b) The Larimer County Criminal Justice Services PAQ states the agency or facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards. In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities was zero.

The agency provided Larimer County – Criminal Justice Services, Director Memo to all Employees. The memo states, “During the pre-audit phase the Auditor noted with the agency current policy language did include this provisions required language. During the onsite review, the agency determined the following language would be added to policy language and provided a memo, from the Director, addressed to Criminal Justice Services (CJS) Employees.

Please note that we had a successful PREA audit and staff, and residents demonstrated their knowledge and understanding of our zero-tolerance policy of sexual abuse and harassment. As with any audit, we have a few areas we can improve on and language what will be added to policy and procedures within 90 days. Please review and start practicing the following items. If you have any questions, please don't hesitate to contact Nikki Henneman.

7) 115.263 – Allegations received from facilities and agencies are investigated in accordance with the PREA standards.”

Through review of the documentation in response to an allegation received in regard to an allegation at another facility, the facility exceeds this standards requirement.

115.264	<b>Staff first responder duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random staff</li> <li>2. Specialized staff</li> <li>3. Facility Investigator</li> </ol> <p>Interviews with each staff interviewed demonstrated they were aware of their first responder responsibilities. Staff stated reporting information is posted in day rooms and they have access to the 'Green PREA Binder.' The Facility Investigator concurred staff and residents alike report allegations of abuse and each would respond as is designed through facility protocol.</p> <p>Site Observation:</p> <p>Documentation review of the allegations of sexual abuse reported, each demonstrated staff responded accurately and promptly. The facility staff are aware of the facilities detailed reporting protocols to ensure each allegation report is conducted per facility practices.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to separate the alleged victim and abuser. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. The policy requires that, upon learning of an allegation that a resident was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be 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. The policy requires that, upon learning of an allegation that a resident was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be required to ensure that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p>In the past 12 months, 11 allegations occurred where a resident was sexually abused. Of these allegations, the number of times the first security staff member to respond to the report separated the alleged victim and abuser was 11. In the past 12 months, there were six allegations where staff were notified within a time period that still allowed for the collection of evidence. Of these allegations the number of times the first security staff member to respond to the report was zero.</p> <p>Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 9, section VII. A-C, state, “</p> <p>A. At the direction of the PREA Manager or designee, First Responders and subsequent responders shall initiate and complete the First Responder Checklist for a PREA Incident (form #LCCJS-45) and any other applicable forms located in the</p>

PREA Incident Response Manual and ensure designated staff follow appropriate security procedures.

1. Upon learning that an offender is subject to a substantial risk of imminent sexual abuse, the First Responder shall take immediate action to protect the at-risk offender and secure the facility.
2. Depending on the First Responder's role as a CJS Worker, the First Responder may seek assistance from an appropriate CJS employee or supervisor, to complete first response forms and properly carry-out the protective action.
  - B. CJS shall establish procedures for the administrative investigations of sexual abuse or sexual harassment by an offender or CJS worker. Larimer County Human Resources may be brought in on the investigation if adverse action is anticipated or possible as a result of the outcome of any investigation alleging inappropriate conduct by a staff member.
  - C. CJS shall ensure that standard evidence protocols are met anytime that a crime scene, victim, or perpetrator may have usable evidence pertinent to an investigation of alleged sexual abuse or sexual harassment. These protocols are outlined in the PREA training session, and in the First Responder Manual."

(b) The Larimer County Criminal Justice Services PAQ states the facility's' policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero.

Policy compliance can be found in provision (a) of this standard.

115.265	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random staff</li> <li>2. Investigative staff</li> <li>3. PREA Coordinator</li> </ol> <p>Interviews with the random and specialized staff demonstrated the response to allegations of sexual assault is written to coordinate actions taken in response to sexual abuse and sexual harassment incidents.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states the facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 9-10, section VII. States the agencies institutional response:</p> <p>“First Response/Investigative Protocols</p> <p>B. At the direction of the PREA Manager or designee, First Responders and subsequent responders shall initiate and complete the First Responder Checklist for a PREA Incident (form #LCCJS-45) and any other applicable forms located in the PREA Incident Response Manual and ensure designated staff follow appropriate security procedures.</p> <ol style="list-style-type: none"> <li>1. Upon learning that an offender is subject to a substantial risk of imminent sexual abuse, the First Responder shall take immediate action to protect the at-risk offender and secure the facility.</li> <li>2. Depending on the First Responder’s role as a CJS Worker, the First Responder may seek assistance from an appropriate CJS employee or supervisor, to complete first response forms and properly carry-out the protective action.</li> </ol> <p>C. CJS shall establish procedures for the administrative investigations of sexual abuse or sexual harassment by an offender or CJS worker. Larimer County Human Resources may be brought in on the investigation if adverse action is anticipated or possible as a result of the outcome of any investigation alleging inappropriate conduct by a staff member.</p> <p>D. CJS shall ensure that standard evidence protocols are met anytime that a crime scene, victim, or perpetrator may have usable evidence pertinent to an investigation of alleged sexual abuse or sexual harassment. These protocols are outlined in the PREA training session, and in the First Responder Manual.</p> <p>E. Upon the conclusion of any administrative and/or criminal investigation, the victim shall be (if case was substantiated):</p> <ol style="list-style-type: none"> <li>1. Notified of the outcome of the investigation and the determination if their complaint was substantiated, unsubstantiated, or unfounded (CJS shall request all pertinent information from criminal investigators, if applicable)</li> <li>2. Informed whenever the alleged perpetrator (staff or offender) is: <ol style="list-style-type: none"> <li>a. No longer posted in the housing unit</li> <li>b. No longer employed at the facility</li> </ol> </li> </ol>

- c. Indicted
- d. Convicted
- 3. The CJS Victim Witness Specialist shall be responsible for making such notifications and for documenting the notification in the offender file.
- 4. At the conclusion of a PREA qualifying incident, the CJS PREA Coordinator shall notify case managers of the outcome.
- 5. Upon notification from the CJS PREA Coordinator, the case manager shall conduct a PREA re-assessment.
- F. CJS's duty to report to the victim shall end upon the victim leaving custody.
- G. In determining whether an allegation of sexual abuse or sexual harassment is substantiated, unsubstantiated, or unfounded, the decision shall be based solely upon the preponderance of the evidence gathered during the investigation.



115.266	<b>Preservation of ability to protect residents from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ <ul style="list-style-type: none"> <li>(a) The Larimer County Criminal Justice Services PAQ states the agency, facility, or any other governmental entity is not responsible for collective bargaining on the agency's behalf has not entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.</li> </ul> </li> </ol>

115.267	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li>3. Larimer County – Criminal Justice Services, Director Memo to all Employees, dated 1.6.2022</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Victim Witness Specialist</li> </ol> <p>The interview with the Victim Witness Specialist demonstrated she would complete retaliation monitoring for the agency. The Victim Witness Specialist stated she would check in once a month for at least 90 days and or as long as was necessary and document those notes in the LOIS agency database.</p> <p>(a) The Larimer County Criminal Justice Services PAQ states the agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. The agency designates staff member(s) or charges department(s) with monitoring for possible retaliation. Monitoring is completed by Victim Services Specialists.</p> <p>Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section 4.b., states, “Offenders who report sexual abuse shall be monitored for a minimum of 90 days to ensure that they are free from retaliation. Swift action shall be taken if any signs of such retaliation are present. Notice shall be taken of behavior, disciplinary reports, housing, program, or supervision level changes. The CJS Victim Witness Specialist shall be responsible for such monitoring.”</p> <p>The agency provided Larimer County – Criminal Justice Services, Director Memo to all Employees. The memo states, “During the pre-audit phase the Auditor noted with the agency current policy language did include this provisions required language. During the onsite review, the agency determined the following language would be added to policy language and provided a memo, from the Director, addressed to Criminal Justice Services (CJS) Employees.</p> <p>Please note that we had a successful PREA audit and staff, and residents demonstrated their knowledge and understanding of our zero-tolerance policy of sexual abuse and harassment. As with any audit, we have a few areas we can improve on and language what will be added to policy and procedures within 90 days. Please review and start practicing the following items. If you have any questions, please don’t hesitate to contact Nikki Henneman.</p> <p>10) 115.267 (a)(f) – Other individuals, besides the victim who cooperate with an investigation express a fear of retaliation, the agency will take appropriate measures to protect those individual(s).</p> <p>11) 115.267 (c) – CJS will provide monitoring of retaliation for victims and staff at a minimum of once a month for 90 days and document these monitors in the agency computer system.”</p> <p>(b) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section 4.a., states, “Offenders who report such conduct are protected from retaliation as outlined in CJS Policy #100.110.204 Professional Conduct, and shall be entitled to additional protection measures, if warranted, to ensure that no such retaliation takes place. These measures include, but are not limited to:</p> <ol style="list-style-type: none"> <li>i Changed housing assignments</li> </ol>

- ii Facility transfers
- iii Additional status checks/watches
- iv Removal of contact with alleged staff or resident abusers
- v Emotional support services through in-house advocate or SAVA.”

(c) The Larimer County Criminal Justice Services PAQ states the facility monitors the conduct or treatment of Residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to ascertain if there are any changes that may suggest possible retaliation by Residents or staff. The facility will monitor conduct or treatment until the Resident is discharged. The facility acts promptly to remedy any such retaliation. In the past 12 months, the facility has had zero incidents of retaliation.

Policy compliance can be found in provision (a) of this standard.

(d) The Larimer County Criminal Justice Services PAQ states the agency/facility monitors the conduct or treatment of residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by residents or staff. The number of times an incident of retaliation occurred in the past 12 months was zero. Agency and policy compliance can be found in provisions (a) of this standard.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021

Interviews:

1. Targeted residents
2. Facility Investigator
3. PREA Coordinator

The investigator clearly articulated processes required during an investigation, to include a thorough review and in-depth documentation process.

Site Observation:

Review of the Administrative Investigation was completed thoroughly and within 30 days of the initial report. The investigation included interviews with victims, perpetrators and staff with review of the area where the allegation took place.

(a) The Larimer County Criminal Justice Services PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 3, section 3.a.-b, states,

- a. "An investigation will be initiated upon receipt of any allegation of sexual abuse and sexual harassment.
- b. An investigation will be initiated in response to any:
  - i Anonymous Report
  - ii 3rd Party Report
  - iii Staff Report
  - iv Offender Report"

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 4, section D.1-2, states,

1. "Criminal Investigations shall be conducted by the Larimer County Sheriff's Office (LCSO), as outlined in the MOU between CJS and LCSO.
2. Administrative investigations shall be conducted by designated trained in-house PREA investigators. "

(b) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 1, defines investigators and training required.

1. "Criminal Investigator: A sworn peace officer responsible for the criminal investigation of sexual abuse and sexual harassment allegations.
2. PREA Investigator: A trained in-house staff member responsible for the administrative investigation of sexual abuse and sexual harassment allegations."

(c-e) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 9, section C, states, "CJS shall ensure that standard evidence protocols are met anytime that a crime scene, victim, or perpetrator may have usable evidence pertinent to an investigation of alleged sexual abuse or sexual harassment. These protocols are outlined in the PREA training session, and in the First Responder Manual."

(f-g) Review of administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse. 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.

(h) The Larimer County Criminal Justice Services PAQ states substantiated allegations of conduct that appear to be criminal are referred for prosecution. The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since the last PREA audit, was nine.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, Page 1, section Policy statement, states, "Criminal Justice Services (CJS) has zero tolerance for sexual abuse and sexual harassment toward offenders. CJS recognizes offenders who have experienced sexual abuse and sexual harassment as crime victims. CJS strictly prohibits such conduct and shall immediately respond to allegations, fully investigate reported incidents, pursue disciplinary action, and refer for investigation and prosecution of those who engage in such conduct."

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 2, section PREA Manager, states, "The PREA Manager shall be responsible for conducting the administrative portion of any investigation and for referring the investigation to law enforcement if appropriate."

(i) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 11, section I, states, "All reports and data shall be maintained for a period of 10 years from the date of the final annual report."

(j) The agency ensures that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation.

115.272	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Larimer County Criminal Justice Services PAQ</li> <li>2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 PREA – Criminal and Administrative Investigation P-600, dated 7.29.2015</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Facility Investigator</li> </ol> <p>The interview with an agency investigator demonstrated the facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>(a) The Larimer County Criminal Justice Services PAQ Bureau states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page, section F., states, "In determining whether an allegation of sexual abuse or sexual harassment is substantiated, unsubstantiated, or unfounded, the decision shall be based solely upon the preponderance of the evidence gathered during the investigation."</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021
3. Larimer County Sheriff's Office Investigation Records

Interviews:

1. Agency Investigator
2. PREA Coordinator

Interviews with a facility investigator and the PREA Coordinator demonstrated notification requirements to victims was provided in writing with documentation of each notification. Written notifications are provided to residents by investigation staff, which residents confirmed. I

(a) The Larimer County Criminal Justice Services PAQ states the agency has a policy requiring that any resident who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of criminal and/or administrative investigations of alleged resident sexual abuse that were completed by the agency/facility in the past 12 months was eight. Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of residents who were notified, verbally or in writing, of the results of the investigation was eight.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 9, section D., states, "Upon the conclusion of any administrative and/or criminal investigation, the victim shall be (if case was substantiated):

1. Notified of the outcome of the investigation and the determination if their complaint was substantiated, unsubstantiated, or unfounded (CJS shall request all pertinent information from criminal investigators, if applicable)
2. Informed whenever the alleged perpetrator (staff or offender) is:
  - a. No longer posted in the housing unit
  - b. No longer employed at the facility
  - c. Indicted
  - d. Convicted
3. The CJS Victim Witness Specialist shall be responsible for making such notifications and for documenting the notification in the offender file."

(b) The Larimer County Criminal Justice Services PAQ states an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident of the outcome of the investigation. The number of investigations of alleged resident sexual abuse in the facility that were completed by an outside agency in the past 12 months was four. Of the outside agency investigations of alleged sexual abuse that were completed in the past 12 months, the number of residents alleging sexual abuse in the facility who were notified verbally or in writing of the results of the investigation was four. The agency provided completed investigations completed by the Larimer County Sheriff's Office.

(c) The Larimer County Criminal Justice Services PAQ states following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently informs the resident (unless the agency has determined that the allegation is unfounded) whenever: (a) the staff member is no longer posted within the resident's unit; (b) the staff member is no longer employed at the facility; (c) the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or (d) the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

There has been one substantiated or unsubstantiated complaint of sexual abuse committed by a staff member against a resident in an agency facility in the past 12 months. At the time of the report, the resident was discharged and no longer living in the facility. Policy compliance for this standard can be found in provision (a) of this standard.

(d) The Larimer County Criminal Justice Services PAQ states following a resident's allegation that he or she has been sexually abused by another resident in an agency facility, the agency subsequently informs the alleged victim whenever: (a) the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or (b) the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. Policy compliance for this standard can be found in provision (a) of this standard.

(e) The Larimer County Criminal Justice Services PAQ states the agency has a policy that all notifications to residents described under this standard are documented. In the past 12 months, there has been six notifications to a resident, pursuant to this standard. Of those motivations, in the past 12 months, six were documented. Policy compliance for this revision can be found in provision (a) of this standard.



115.276	<b>Disciplinary sanctions for staff</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 435 300">Document Review:</p> <ol data-bbox="242 329 1445 539" style="list-style-type: none"> <li data-bbox="242 329 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="242 387 1425 450">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li data-bbox="242 479 1445 539">3. Larimer County Criminal Justice Services Division Policy and Procedures 1.00.110.204 Professional Conduct, dated 12.7.2016</li> </ol> <p data-bbox="242 624 352 654">Interviews:</p> <ol data-bbox="242 683 488 712" style="list-style-type: none"> <li data-bbox="242 683 488 712">1. PREA Coordinator</li> </ol> <p data-bbox="242 741 1445 804">Through review of investigations with the PREA Coordinator demonstrated there were zero staff who were disciplined for violation of an agency sexual abuse or sexual harassment policy.</p> <p data-bbox="242 889 1457 952">(a) The Larimer County Criminal Justice Services PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p data-bbox="242 1037 1490 1301">Larimer County Criminal Justice Services Division Policy and Procedures 1.00.110.204 Professional Conduct, page 7, section 18, states, "Physical contact, not related to job performance duties or incidental, between offenders and employees is prohibited. Any and all offender searches must be conducted in accordance with policy and procedure (see CJSD Policy #1.00.130.109 Offender Searches). Sexual relationships and/or sexual activity between employees and offenders is strictly prohibited (see CJSD Policy #1.00.140.101 PREA). Violation of this provision may result in law enforcement involvement and having the incident reported to any relevant licensing or accrediting agency or body to which the violator is legally or ethically accountable. While Larimer County employment policies shall govern, the presumptive discipline for acts of sexual misconduct in the workplace is termination from employment."</p> <p data-bbox="242 1386 1433 1449">(b) The Larimer County Criminal Justice Services PAQ states in the last 12 months, there has been zero staff from the facility that had violated agency sexual abuse or sexual harassment policies.</p> <p data-bbox="242 1534 1485 1697">(c) The Larimer County Criminal Justice Services PAQ states disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In the past 12 months there have zero staff requiring discipline for sexual abuse or sexual harassment. Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="242 1783 1485 1946">(d) The Larimer County Criminal Justice Services PAQ states 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, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff have been terminated for sexual abuse or harassment. Policy compliance can be found in provision (a) of this standard.</p>

115.277	<b>Corrective action for contractors and volunteers</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 435 300">Document Review:</p> <ol data-bbox="242 329 1426 539" style="list-style-type: none"> <li data-bbox="242 329 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="242 387 1426 450">2. Larimer County Criminal Justice Services Division, Policy and Procedures 1.00.110.159 Contract Workers, dated, 6.25.2014</li> <li data-bbox="242 479 1426 539">3. Larimer County Criminal Justice Services, Policy and Procedures 100.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> </ol> <p data-bbox="242 624 419 654">Site Observation:</p> <p data-bbox="242 683 1485 777">During the last audit cycle, the facility did not have any volunteers or contractors subject to disciplinary action due to violating sexual abuse or sexual harassment policies. Of the volunteer and contractor files reviewed, none had disciplinary action for violations of sexual abuse or sexual harassment.</p> <p data-bbox="242 864 1485 1059">(a) The Larimer County Criminal Justice Services PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies (unless the activity was clearly not criminal) and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with residents. In the past 12 months, contractors or volunteers have not been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of residents. In the past 12 months, the number of contractors or volunteers reported to law enforcement for engaging in sexual abuse of residents was zero.</p> <p data-bbox="242 1146 1485 1408">Larimer County Criminal Justice Services Division, Policy and Procedures 1.00.110.159 Contract Workers, page 2, paragraphs 5-6, state, "Under no circumstances shall a Contract Worker who has engaged in or has been convicted or adjudicated of sexual misconduct, either in an institution or in the community, be granted access to a CJSD facility. Additionally, any contractor who engages in such activity shall be reported to the appropriate licensing and law enforcement agencies. While under contract, anyone who engages in, or is alleged to have engaged in, sexual misconduct or other conduct deemed unethical and incongruent with CJSD mission or goals; or conduct deemed to reflect negatively on the agency, shall, at the discretion of the Department or Division Director, be denied access to CJSD buildings, programs, residents, and personnel pending the outcome of an administrative and/or criminal investigation."</p> <p data-bbox="242 1496 1434 1590">(b) The Larimer County Criminal Justice Services PAQ the facility takes appropriate remedial measures and considers whether to prohibit further contact with Residents in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p>

115.278	<b>Disciplinary sanctions for residents</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1457 654" style="list-style-type: none"> <li data-bbox="240 331 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="240 389 1425 448">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li data-bbox="240 479 1023 506">3. Larimer County Criminal Justice PREA Offender Brochure, dated 10.2020</li> <li data-bbox="240 537 1457 595">4. Larimer County Criminal Justice Criminal Justice Services Division Alternative Sentencing Department Work Release Offender Handbook, not dated</li> <li data-bbox="240 627 1032 654">5. Larimer County Community Corrections Resident Handbook, dated 6.2021</li> </ol> <p data-bbox="240 739 352 766">Interviews:</p> <ol data-bbox="240 797 474 824" style="list-style-type: none"> <li data-bbox="240 797 474 824">1. PREA Coordinator</li> </ol> <p data-bbox="240 855 1457 913">An interview with the PREA Coordinator demonstrated residents who falsely reported PREA allegations would typically be moved to another dorm and or facility due to safety reasons for the resident.</p> <p data-bbox="240 1003 1489 1196">(a-b) The Larimer County Criminal Justice Services PAQ states residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that a resident engaged in resident-on-resident sexual abuse. Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. In the past 12 months, the number of administrative findings of resident-on-resident sexual abuse that have occurred at the facility was six. In the past 12 months, the number of criminal findings of guilt for resident-on-resident sexual abuse that have occurred at the facility was one.</p> <p data-bbox="240 1285 1479 1379">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 5, section D, states, "Unfounded, deliberately malicious, or false reports by offenders or other parties will result in disciplinary action or criminal charges."</p> <p data-bbox="240 1469 1479 1563">(c) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, page 7, section G. states, "Offenders may not be disciplined for refusing to answer, or for not disclosing complete information, in response to screening questions regarding:</p> <ol data-bbox="240 1594 962 1796" style="list-style-type: none"> <li data-bbox="240 1594 745 1621">1. Mental, physical, or developmental disabilities</li> <li data-bbox="240 1653 738 1680">2. Sexual orientation, gender, or gender identity</li> <li data-bbox="240 1711 962 1738">3. Whether or not they have experienced previous sexual victimization</li> <li data-bbox="240 1769 604 1796">4. Own perception of vulnerability"</li> </ol> <p data-bbox="240 1886 1479 1944">(e) The Larimer County Criminal Justice Services PAQ states the agency disciplines residents for sexual conduct with staff only upon finding that the staff member did not consent to such contact.</p> <p data-bbox="240 1975 1489 2033">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, page 2, section B. states, "Sexual abuse of an offender by a CJS Worker includes any of the following acts, with or without consent of the offender:"</p> <p data-bbox="240 2123 1479 2150">(f) The Larimer County Criminal Justice Services PAQ states the agency prohibits disciplinary action for a report of sexual</p>

abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

(g) The Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 1, section Policy states, "CJS strictly prohibits such conduct and shall immediately respond to allegations, fully investigate reported incidents, pursue disciplinary action, and refer for investigation and prosecution of those who engage in such conduct."

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated, 7.20.2021

Interviews:

1. Targeted residents
2. Victim Witness Specialist
3. PREA Coordinator

Interviews with the targeted residents and specialized staff demonstrated disclosure reports are reported to the PREA Coordinator, Victim Witness Specialist and or Program Managers. Documentation of disclosures and follow up appointments are documented in the agency LOIS database.

Site Observation:

A review of resident files demonstrated resident disclosures are documented and follow up medical and or mental health appointments are offered and documented.

(a) The Larimer County Criminal Justice Services PAQ states resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 7, section V., states, "CJS shall develop procedures for providing victim services to offenders who allege that they are victims of sexual abuse or sexual harassment by an offender or CJS worker. Services must include, at minimum:

1. Medical examination (forensic or otherwise), documentation, and treatment of injuries
  - a. Any Forensic Medical Examination shall be conducted in a facility and by personnel following Sexual Assault Nurse Examiner (SANE) protocols. To this end, Medical Center of the Rockies shall be the exclusive providers of SANE services to CJS.
  - b. This service will be made available at no cost to victims unless the victim is charged with false reporting of the incident.
2. Mental health crisis intervention and treatment
3. Social, family, and peer support"

(b) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section C., states, "The CJS Victim Witness Specialist shall ensure that mental health referrals are made to community support/service providers such as SAVA for crisis intervention and/or trauma specific treatment for offenders that are victims of sexual abuse or sexual harassment perpetrated by an offender or CJS worker, and that referrals are made for non-victim offenders who were also affected."

(c) The Larimer County Criminal Justice Services PAQ states, resident victims of sexual abuse while incarcerated are

offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section E-F, state, "Victims of sexual assault while in the custody or under the jurisdiction of CJS may receive any and all medical and counseling services offered under this policy regardless of their decision to involve law enforcement, name a perpetrator, or cooperate with any investigation. All programs shall allow unimpeded access to all community medical and mental health care, consistent with program rules and requirements."

(d) The Larimer County Criminal Justice Services PAQ states, treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section D, states, "All victim services offered to an offender who was sexually assaulted while in the custody or under the jurisdiction of CJS shall be offered at no cost to the victim."

115.283	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<p data-bbox="240 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1425 506" style="list-style-type: none"> <li data-bbox="240 331 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="240 389 1425 448">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> <li data-bbox="240 479 1214 506">3. Larimer County – Criminal Justice Services, Director Memo to all Employees, dated 1.6.2022</li> </ol> <p data-bbox="240 595 352 622">Interviews:</p> <ol data-bbox="240 654 572 846" style="list-style-type: none"> <li data-bbox="240 654 477 680">1. Targeted residents</li> <li data-bbox="240 712 424 739">2. Random staff</li> <li data-bbox="240 770 572 797">3. Correctional Case Specialist</li> <li data-bbox="240 828 541 855">4. Victim Witness Specialist</li> </ol> <p data-bbox="240 887 1437 972">Interviews with specialized and random staff and residents demonstrated that each interviewed are aware of access to emergency medical and mental health services. Residents who reported sexual abuse reported staff acted immediately, empathetically and addressed their concerns and needs.</p> <p data-bbox="240 1061 1466 1155">(a) The Larimer County Criminal Justice Services PAQ states the facility offers medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.</p> <p data-bbox="240 1245 1481 1402">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section C, states, “The CJS Victim Witness Specialist shall ensure that mental health referrals are made to community support/service providers such as SAVA for crisis intervention and/or trauma specific treatment for offenders that are victims of sexual abuse or sexual harassment perpetrated by an offender or CJS worker, and that referrals are made for non-victim offenders who were also affected.”</p> <p data-bbox="240 1491 1469 1585">(b) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section F., states, “All programs shall allow unimpeded access to all community medical and mental health care, consistent with program rules and requirements.”</p> <p data-bbox="240 1675 1481 1805">(c) Larimer The agency provided Larimer County – Criminal Justice Services, Director Memo to all Employees. The memo states, “During the pre-audit phase the Auditor noted with the agency current policy language did include this provisions required language. During the onsite review, the agency determined the following language would be added to policy language and provided a memo, from the Director, addressed to Criminal Justice Services (CJS) Employees.</p> <p data-bbox="240 1895 1490 2024">Please note that we had a successful PREA audit and staff, and residents demonstrated their knowledge and understanding of our zero-tolerance policy of sexual abuse and harassment. As with any audit, we have a few areas we can improve on and language what will be added to policy and procedures within 90 days. Please review and start practicing the following items. If you have any questions, please don’t hesitate to contact Nikki Henneman.</p> <p data-bbox="240 2047 1449 2110">12) 115.283 (c) – CJS will provide victims with medical and mental health services consistent with the community level of care.”</p>

(d) The Larimer County Criminal Justice Services PAQ states female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section E., states, "Victims of sexual assault while in the custody or under the jurisdiction of CJS may receive any and all medical and counseling services offered under this policy regardless of their decision to involve law enforcement, name a perpetrator, or cooperate with any investigation."

(f) The Larimer County Criminal Justice Services PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 7, section B. 3., states, "If reported more than 10 days after the incident, staff shall, with the victim's permission, refer the victim to health care services responsible for treatment and follow-up care for sexually transmitted or other communicable diseases."

(g) Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 8, section D, states, "All victim services offered to an offender who was sexually assaulted while in the custody or under the jurisdiction of CJS shall be offered at no cost to the victim."

(h) This Larimer County Criminal Justice Services PAQ states the facility does not attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.



**Auditor Overall Determination:** Exceeds Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021
3. Larimer County Criminal Justice Services PREA Incident Debriefing Report, dated 11.2020
4. Incident Review PREA Meeting Notes, dated 2.3.2021
5. Larimer County Criminal Justice Services Prison Rape Elimination Act Annual Report 2020-2021
6. Camera discussion documentation, dated 2.21.2020
7. Camera install request documentation, not dated

Interviews:

1. Investigation staff
2. PREA Coordinator

The team on-site clearly articulated their review of all incidents reported and investigations of sexual harassment and sexual abuse.

(a) The Larimer County Criminal Justice Services PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months there has been seven criminal and or administrative investigations of alleged sexual abuse completed at the facility,

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 4, section 4, states, "SART shall meet at the conclusion of all administrative and/or criminal investigations to:

- a. Conduct a full incident review using the PREA Incident Debriefing Report (Form #LCCJS-41);
- b. Ensure that all required follow up steps are communicated to staff;
- c. Explore alternatives to prevent incidents or improve the response to events in the future.

The agency provided a Larimer County Criminal Justice Services PREA Incident Debriefing Report. The report includes:

- Date/Time of Incident
- Date/Time of Report
- Victim Name(s)/DOB
- Assailant Name(s)
- Incident Type
- Findings
- Brief Event Description
- Discussion Points for SART Team

- Final Findings/Recommended Remedies/Articulated Reasons for Not Making Changes
- Final Checklist
- PREA Coordinator Review/date

The agency provided incident review PREA meeting notes. Meeting notes demonstrate:

- Date
- Meeting attendees
- Video review
- Additional training needs
- Review of interviews
- Review of incident details

(b) The Larimer County Criminal Justice Services PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only “unfounded” incidents were seven.

(c) The Larimer County Criminal Justice Services PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.

Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 4, section 4.C., states, “The Sexual Assault Response Team (SART) shall be comprised of members specifically trained in responding to sexual abuse and sexual harassment.

1. SART members shall include:

- a. PREA Coordinator
- b. PREA Managers (one for Community Corrections and one for Alternative Sentencing)
- c. Community Corrections Security Assistant Director (or designee)
- d. CJS Victim Witness Specialist

(d) The Larimer County Criminal Justice Services PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA Coordinator.

Compliance can be found in provision (a) of this standard.

(a) The Larimer County Criminal Justice Services PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so.

The agency provided a Larimer County Criminal Justice Services PREA Incident Debriefing Report. Question 6 on the Debriefing Report states, “Final Finding/Recommended Remedies/Articulated Reasons for Not Making Changes:”

Through such review of the agency Sexual Assault Review Team processes, the facility exceeds this standards requirements.

115.287	<b>Data collection</b>
	<p data-bbox="240 147 766 174"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="240 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 273 435 300">Document Review:</p> <ol data-bbox="240 331 1426 448" style="list-style-type: none"> <li data-bbox="240 331 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="240 389 1426 448">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> </ol> <p data-bbox="240 533 1489 595">(a) The Larimer County Criminal Justice Services PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</p> <p data-bbox="240 680 1481 775">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 10, section XI. A., states, "The PREA Coordinator shall collect accurate and uniform data for every allegation of sexual abuse at a CJS facility."</p> <p data-bbox="240 864 1461 927">(b) The Larimer County Criminal Justice Services PAQ states the agency aggregates the incident-based sexual abuse at least annually.</p> <p data-bbox="240 1012 1493 1106">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 11, section XI. D.1-4, states, "Data shall be compiled and, annually in May, a preliminary report shall be issued from the PREA Coordinator to the CJS Director and Department Directors, which shall:</p> <ol data-bbox="240 1137 954 1339" style="list-style-type: none"> <li data-bbox="240 1137 775 1164">1. Compare current year data to previous year data</li> <li data-bbox="240 1196 954 1223">2. Compile a list of identified problem areas or areas for improvement</li> <li data-bbox="240 1254 839 1281">3. Identify corrective actions taken to address those areas</li> <li data-bbox="240 1312 858 1339">4. Document reasons (if any) for not taking corrective action</li> </ol> <p data-bbox="240 1424 1485 1518">(c) The Larimer County Criminal Justice Services PAQ states the standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.</p> <p data-bbox="240 1603 1493 1697">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 11, section XI. B., states, "Such data shall be collected and organized using the most recent "Survey of Sexual Violence Form" put out by the Department of Justice (DOJ)."</p> <p data-bbox="240 1783 1469 1845">(d) The Larimer County Criminal Justice Services PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p data-bbox="240 1930 1493 1993">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, page 11, section XI. C., states, "Data shall be compiled from all incident reporting sources, including, but not limited to:</p> <ol data-bbox="240 2024 464 2114" style="list-style-type: none"> <li data-bbox="240 2024 435 2051">1. Police Reports</li> <li data-bbox="240 2083 464 2114">2. Behavior Reports</li> </ol>

3. SART Reports
4. Incident Review Reports
5. Case Notes
6. Emails or other electronic communication"

(e) This provision is not applicable as Larimer County Criminal Justice Services as they do not have private facilities.

(f) This provision is not applicable as Larimer County Criminal Justice Services as DOJ has not requested agency data.

Through such reviews of the agency in-depth annual report, the facility exceeds this standards requirements.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Larimer County Criminal Justice Services PAQ
2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021
3. Larimer County Criminal Justice Services Prison Rape Elimination Act Annual Report 2020-2021
4. Agency Annual Report website: <https://www.larimer.org/cjs>

(a) The Larimer County Criminal Justice Services PAQ states the agency reviews data collected and aggregated pursuant to §115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: (a) identifying problem areas; (b) taking corrective action on an ongoing basis; and (c) preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.

The agency provided the Larimer County Criminal Justice Services Prison Rape Elimination Act Annual Report 2020-2021. Page 6, section 2-Analysis of Data/Actions Taken, states,

2.1 "Number of Reports

2.2 Coordination of Response

2.3 Offender Education

2.4 Staff Education"

Each area of the analysis of data includes an extensive and comprehensive analysis, and action taken.

(b) The Larimer County Criminal Justice Services PAQ states the annual report includes a comparison of the current year's data and corrective actions to those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse.

The agency provided the Larimer County Criminal Justice Services Prison Rape Elimination Act Annual Report 2020-2021. Pages 9-12 entail data for years 2015 through 2021. Data includes:

- Investigative Outcomes for all report types and outcomes, to include comprehensive analysis and comparisons.
- o Unfounded Reports
- o Unsubstantiated Harassment
- o Unsubstantiated Abuse
- o Substantiated Harassment
- o Substantiated Abuse

(c) The Larimer County Criminal Justice Services PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head.

The Agency Annual Report is available on the following website: <https://www.larimer.org/cjs>

(d) The Larimer County Criminal Justice Services PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility.

The agency provided the Larimer County Criminal Justice Services Prison Rape Elimination Act Annual Report 2020-2021. Pages 4-8 include extensive yet limited specific information on the reports data.

115.289	<b>Data storage, publication, and destruction</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="242 271 435 300">Document Review:</p> <ol data-bbox="242 329 1426 448" style="list-style-type: none"> <li data-bbox="242 329 754 358">1. Larimer County Criminal Justice Services PAQ</li> <li data-bbox="242 387 1426 448">2. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021</li> </ol> <p data-bbox="242 533 1465 629">(a) The Larimer County Criminal Justice Services PAQ states the agency ensures that incident-based and aggregate data are securely retained. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, page 11, section I., states, "All reports and data shall be maintained for a period of 10 years from the date of the final annual report."</p> <p data-bbox="242 716 1452 813">(b) The Larimer County Criminal Justice Services PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.</p> <p data-bbox="242 898 1449 958">Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, page 11, section I., states, "Following the director review, a final report shall be issued and distributed/made available:</p> <ol data-bbox="242 990 628 1133" style="list-style-type: none"> <li data-bbox="242 990 499 1019">1. To agency personnel</li> <li data-bbox="242 1048 628 1077">2. To the public (via agency website)</li> <li data-bbox="242 1106 563 1133">3. To the DOJ (upon request)"</li> </ol> <p data-bbox="242 1220 1433 1317">(c) The Larimer County Criminal Justice Services PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. Larimer County Criminal Justice Services Policy and Procedures 1.00.140.101, page 11, section H., states, "All personal identifiers shall be removed prior to publication."</p> <p data-bbox="242 1402 871 1431">(d) Compliance can be found in provision (a) of this standard.</p>



115.401	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>a. During the prior three-year audit period, the agency ensure that each facility was audited at least once.</p> <p>b. This is the third year of the current audit cycle. this agency has only two facilities, of which both were audited during this audit cycle.</p> <p>h. The auditor had access to, and the ability to observe, all areas of the audited facility.</p> <p>i. The auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>m. The auditor was permitted to conduct private interviews with residents.</p> <p>n. The residents were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. The auditor did not receive any letters from residents.</p>

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	f. The agency has published on its agency website Final audit reports of each audit conducted at their facilities.

<b>Appendix: Provision Findings</b>		
<b>115.211 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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
<b>115.211 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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 community confinement facilities?	yes
<b>115.212 (a)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities, including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
<b>115.212 (b)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
<b>115.212 (c)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	If the agency has entered into a contract with an entity that fails to comply with the PREA standards, did the agency do so only in emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
	In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
<b>115.213 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring to protect residents against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The physical layout of each facility?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the resident population?	yes
	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

<b>115.213 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (NA if no deviations from staffing plan.)	yes
<b>115.213 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility 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 assessed, determined, and documented whether adjustments are needed to prevailing staffing patterns?	yes
	In the past 12 months, has the facility 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 assessed, determined, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels?	yes
<b>115.215 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.215 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches of female residents, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female residents' access to regularly available programming or other outside opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
<b>115.215 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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 residents?	yes
<b>115.215 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enable residents 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?	yes
	Does the facility have procedures that enable residents 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?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing?	yes

<b>115.215 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex residents for the sole purpose of determining the resident's genital status?	yes
	If the resident's genital status is unknown, does the facility determine genital status during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.215 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex residents in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

115.216 (a)	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that residents 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: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents 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: Residents who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that residents 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: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents 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: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents 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: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents 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 residents 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 residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
115.216 (b)	<b>Residents with disabilities and residents who are limited English proficient</b>	
	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 residents 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

<b>115.216 (c)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or the investigation of the resident's allegations?	yes
<b>115.217 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents 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 residents 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 residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two questions immediately above ?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents 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 the services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two questions immediately above ?	yes
<b>115.217 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with residents?	yes
	Does the agency consider any incidents of sexual harassment in determining to enlist the services of any contractor who may have contact with residents?	yes
<b>115.217 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, 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
<b>115.217 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
<b>115.217 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes

<b>115.217 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with residents 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 residents 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
<b>115.217 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.217 (h)</b>	<b>Hiring and promotion decisions</b>	
	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
<b>115.218 (a)</b>	<b>Upgrades to facilities and technology</b>	
	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 residents 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.)	no
<b>115.218 (b)</b>	<b>Upgrades to facilities and technology</b>	
	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 residents from sexual abuse? (N/A if agency/facility has not installed or updated any video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012 or since the last PREA audit, whichever is later.)	no
<b>115.221 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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
<b>115.221 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	na
	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? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	yes



<b>115.221 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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
<b>115.221 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.221 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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
<b>115.221 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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.)	yes
<b>115.221 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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 attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above).	yes
<b>115.222 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	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

<b>115.222 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy 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
<b>115.222 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	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 conducting criminal investigations. See 115.221(a).)	yes
<b>115.231 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents 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 residents on: Residents' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The right of residents 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 residents on: The dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with residents 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 residents on: How to avoid inappropriate relationships with residents?	yes
	Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?	yes
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
<b>115.231 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes

<b>115.231 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with residents 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
<b>115.231 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.232 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.232 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
<b>115.232 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.233 (a)</b>	<b>Resident education</b>	
	During intake, do residents receive information explaining: The agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining: How to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	During intake, do residents receive information explaining: Their rights to be free from sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining: Their rights to be free from retaliation for reporting such incidents?	yes
	During intake, do residents receive information regarding agency policies and procedures for responding to such incidents?	yes
<b>115.233 (b)</b>	<b>Resident education</b>	
	Does the agency provide refresher information whenever a resident is transferred to a different facility?	yes

<b>115.233 (c)</b>	<b>Resident education</b>	
	Does the agency provide resident education in formats accessible to all residents, including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Have limited reading skills?	yes
<b>115.233 (d)</b>	<b>Resident education</b>	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
<b>115.233 (e)</b>	<b>Resident education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
<b>115.234 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.231, 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 criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
<b>115.234 (b)</b>	<b>Specialized training: Investigations</b>	
	Does this specialized training include: Techniques for interviewing sexual abuse victims?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(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 criminal or administrative sexual abuse investigations. See 115.221(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 criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
<b>115.234 (c)</b>	<b>Specialized training: Investigations</b>	
	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 criminal or administrative sexual abuse investigations. See 115.221(a).)	yes

<b>115.235 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	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
<b>115.235 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	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 does not employ medical staff or the medical staff employed by the agency do not conduct forensic exams.)	no
<b>115.235 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	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
<b>115.235 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.231? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	yes
<b>115.241 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all residents assessed during an intake screening for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
	Are all residents assessed upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
<b>115.241 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.241 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

<b>115.241 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The age of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The physical build of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the resident about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the resident is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The resident's own perception of vulnerability?	yes
<b>115.241 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes
<b>115.241 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Within a set time period not more than 30 days from the resident's arrival at the facility, does the facility reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
<b>115.241 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the facility reassess a resident's risk level when warranted due to a: Referral?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Request?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness?	yes

<b>115.241 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Is it the case that residents 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
<b>115.241 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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 resident's detriment by staff or other residents?	yes
<b>115.242 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents 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 § 115.241, with the goal of keeping separate those residents 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 § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents 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 § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
<b>115.242 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each resident?	yes
<b>115.242 (c)</b>	<b>Use of screening information</b>	
	When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?	yes
<b>115.242 (d)</b>	<b>Use of screening information</b>	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
<b>115.242 (e)</b>	<b>Use of screening information</b>	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes

<b>115.242 (f)</b>	<b>Use of screening information</b>	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: transgender residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
<b>115.251 (a)</b>	<b>Resident reporting</b>	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.251 (b)</b>	<b>Resident reporting</b>	
	Does the agency also provide at least one way for residents 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 resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
<b>115.251 (c)</b>	<b>Resident reporting</b>	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.251 (d)</b>	<b>Resident reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes



<b>115.252 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
<b>115.252 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit residents 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 a resident 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
<b>115.252 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: a resident 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 is exempt from this standard.)	yes
<b>115.252 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	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 residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency determines that the 90-day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension is 70 days per 115.252(d)(3)), does the agency notify the resident 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 resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
<b>115.252 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents 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 residents? (If a third party files such a request on behalf of a resident, 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 resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	yes

<b>115.252 (f)</b>	<b>Exhaustion of administrative remedies</b>	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident 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 a resident 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 resident 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
<b>115.252 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
<b>115.253 (a)</b>	<b>Resident access to outside confidential support services</b>	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents 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 enable reasonable communication between residents and these organizations, in as confidential a manner as possible?	yes
<b>115.253 (b)</b>	<b>Resident access to outside confidential support services</b>	
	Does the facility inform residents, 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
<b>115.253 (c)</b>	<b>Resident access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents 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
<b>115.254 (a)</b>	<b>Third party reporting</b>	
	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 a resident?	yes

<b>115.261 (a)</b>	<b>Staff and agency reporting duties</b>	
	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 residents 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
<b>115.261 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, do staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.261 (c)</b>	<b>Staff and agency reporting duties</b>	
	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 residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.261 (d)</b>	<b>Staff and agency reporting duties</b>	
	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?	no
<b>115.261 (e)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.262 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
<b>115.263 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that a resident 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
<b>115.263 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.263 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.263 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

<b>115.264 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that a resident 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 a resident 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 a resident 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 a resident 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
<b>115.264 (b)</b>	<b>Staff first responder duties</b>	
	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
<b>115.265 (a)</b>	<b>Coordinated response</b>	
	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
<b>115.266 (a)</b>	<b>Preservation of ability to protect residents from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
<b>115.267 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.267 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

<b>115.267 (c)</b>	<b>Agency protection against retaliation</b>	
	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 residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents 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 residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents 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 of sexual abuse, does the agency: Monitor any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency:4. Monitor resident 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 resident 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 reassignment of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.267 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of residents, does such monitoring also include periodic status checks?	yes
<b>115.267 (e)</b>	<b>Agency protection against retaliation</b>	
	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
<b>115.271 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	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 115.221(a). )	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a). )	yes
<b>115.271 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.234?	yes

<b>115.271 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.271 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	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?	no
<b>115.271 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	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 resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.271 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.271 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.271 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.271 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.271(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.271 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
<b>115.271 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	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 any form of administrative or criminal sexual abuse investigations. See 115.221(a).)	yes
<b>115.272 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	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

<b>115.273 (a)</b>	<b>Reporting to residents</b>	
	Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.273 (b)</b>	<b>Reporting to residents</b>	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
<b>115.273 (c)</b>	<b>Reporting to residents</b>	
	Following a resident'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 posted within the resident's unit?	yes
	Following a resident'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 a resident'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 a resident'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
<b>115.273 (d)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that he or she has been sexually abused by another resident, 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 a resident's allegation that he or she has been sexually abused by another resident, 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
<b>115.273 (e)</b>	<b>Reporting to residents</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.276 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.276 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

<b>115.276 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	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
<b>115.276 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	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
<b>115.277 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	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
<b>115.277 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	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 residents?	yes
<b>115.278 (a)</b>	<b>Disciplinary sanctions for residents</b>	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.278 (b)</b>	<b>Disciplinary sanctions for residents</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
<b>115.278 (c)</b>	<b>Disciplinary sanctions for residents</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.278 (d)</b>	<b>Disciplinary sanctions for residents</b>	
	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 resident to participate in such interventions as a condition of access to programming and other benefits?	no
<b>115.278 (e)</b>	<b>Disciplinary sanctions for residents</b>	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes



<b>115.278 (f)</b>	<b>Disciplinary sanctions for residents</b>	
	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
<b>115.278 (g)</b>	<b>Disciplinary sanctions for residents</b>	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
<b>115.282 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do resident 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
<b>115.282 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	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 § 115.262?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.282 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are resident 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
<b>115.282 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	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
<b>115.283 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.283 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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
<b>115.283 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.283 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident 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 residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes

<b>115.283 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.283(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 residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.283 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.283 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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
<b>115.283 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	no
<b>115.286 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.286 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.286 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.286 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.286(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.286 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

<b>115.287 (a)</b>	<b>Data collection</b>	
	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
<b>115.287 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.287 (c)</b>	<b>Data collection</b>	
	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
<b>115.287 (d)</b>	<b>Data collection</b>	
	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
<b>115.287 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
<b>115.287 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
<b>115.288 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.287 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 § 115.287 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 § 115.287 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
<b>115.288 (b)</b>	<b>Data review for corrective action</b>	
	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
<b>115.288 (c)</b>	<b>Data review for corrective action</b>	
	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
<b>115.288 (d)</b>	<b>Data review for corrective action</b>	
	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
<b>115.289 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.287 are securely retained?	yes

<b>115.289 (b)</b>	<b>Data storage, publication, and destruction</b>	
	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
<b>115.289 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.289 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.287 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	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
<b>115.401 (b)</b>	<b>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.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with residents?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes