

PREA Facility Audit Report: Final

Name of Facility: Clallam Bay Corrections Center

Facility Type: Prison / Jail

Date Interim Report Submitted: 10/30/2023

Date Final Report Submitted: 03/12/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Robert Palmquist	Date of Signature: 03/12/ 2024

AUDITOR INFORMATION	
Auditor name:	Palmquist, Robert
Email:	robobem@gmail.com
Start Date of On-Site Audit:	09/13/2023
End Date of On-Site Audit:	09/15/2023

FACILITY INFORMATION	
Facility name:	Clallam Bay Corrections Center
Facility physical address:	1830 Eagle Crest Way, Clallam Bay,, Washington - 98326
Facility mailing address:	

Primary Contact	
Name:	Julie Smith
Email Address:	Julie.smith@doc.wa.gov
Telephone Number:	13602031307

Warden/Jail Administrator/Sheriff/Director	
Name:	Jeri Boe
Email Address:	jlboe@doc1.wa.gov
Telephone Number:	13602031204

Facility PREA Compliance Manager	
Name:	Laura Paul
Email Address:	llpaul@doc1.wa.gov
Telephone Number:	

Facility Characteristics	
Designed facility capacity:	900
Current population of facility:	417
Average daily population for the past 12 months:	393
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Males
Age range of population:	19-76
Facility security levels/inmate custody levels:	Maximum, Close, Medium
Does the facility hold youthful inmates?	No

Number of staff currently employed at the facility who may have contact with inmates:	359
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	18
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	36

AGENCY INFORMATION	
Name of agency:	Washington Department of Corrections
Governing authority or parent agency (if applicable):	State of Washington
Physical Address:	7345 Linderson Way Southwest, Tumwater, Washington - 98501
Mailing Address:	
Telephone number:	3607258213

Agency Chief Executive Officer Information:	
Name:	Dr. Cheryl Strange
Email Address:	cheryl.strange@doc.wa.gov
Telephone Number:	360-725-8810

Agency-Wide PREA Coordinator Information			
Name:	Michelle Duncan	Email Address:	miduncan@doc1.wa.gov

Facility AUDIT FINDINGS
Summary of Audit Findings
The OAS automatically populates the number and list of Standards exceeded, the number of

Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:

0

Number of standards met:

45

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-09-13
2. End date of the onsite portion of the audit:	2023-09-15

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:	<p>The Auditor spoke to an advocate representing the Office of Crime Victims Advocacy (OCVA) and Program Mariposa House, the local community-based sexual assault advocacy organization, to discuss the emotional support services offered and provided to offenders following an experience of sexual abuse at Clallam Bay Corrections Center. The Auditor corresponded with Just Detention International (JDI) to learn if the advocacy organization received any information related to the sexual safety of incarcerated individuals confined at the Clallam Bay Corrections Center. A review indicated zero allegations reported to Just Detention International (JDI).</p> <p>Program Director Mariposa House Forks, WA 360-640-0797</p>

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	900
15. Average daily population for the past 12 months:	393

16. Number of inmate/resident/detainee housing units:	5
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:	434
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:	0
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:	0
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:	0

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:	3
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:	6
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:	2
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:	1
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:	77
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):	No text provided.

Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
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:	345
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:	36
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:	16
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.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	20

<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Age</p> <p><input checked="" type="checkbox"/> Race</p> <p><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input checked="" type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Random incarcerated individuals were selected across all housing units. Selections of incarcerated individuals with various custody levels and time in custody. Selections were made from a roster of incarcerated individuals on the day of the onsite visit. Interviews were conducted within private offices in each housing unit.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>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):</p>	<p>Random incarcerated individuals were selected across all housing units. Selections of incarcerated individuals with various custody levels and time in custody. Selections were made from a roster of incarcerated individuals on the day of the onsite visit. Interviews were conducted within private offices in each housing unit.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>15</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:</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 said there were "none here" during the onsite portion of the audit. There were no incarcerated individuals to interview who presented with a physical disability.</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>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 said there were "none here" during the onsite portion of the audit. There were no incarcerated individuals to interview who presented with a cognitive disability.</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 said there were "none here" during the onsite portion of the audit. There were no incarcerated individuals who presented as blind or had low vision.</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>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 said there were "none here" during the onsite portion of the audit. There were no incarcerated individuals who presented as Deaf or hard of hearing.</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>4</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>5</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>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 said there were "none here" during the onsite portion of the audit. There were no incarcerated individuals who presented as Transgender or intersex.</p>
<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:</p>	<p>1</p>
<p>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:</p>	<p>5</p>
<p>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:</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 said there were "none here" during the onsite portion of the audit. There were no incarcerated individuals at the facility who had been placed in segregated housing/ isolation for risk of sexual victimization.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>Fifteen targeted interviews were conducted utilizing four target categories. To supplement these targeted interviews, the Auditor interviewed additional LGBTQI incarcerated individuals, Limited English proficient individuals and incarcerated individuals who reported victimization during intake.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>
<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<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 interviews were selected across all shifts, tenure, and sex. A total number of 12 random staff interviews were conducted. Staff interviews were conducted in a private office.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</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>18</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><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</p> <p><input type="radio"/> No</p>
<p>78. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>79. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

	<input type="checkbox"/> Other
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	Specialized staff were identified from a listing provided by the Clallam Bay PREA Compliance Manager during the pre-onsite phase of the Audit.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

Yes

No

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

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

Yes

No

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

Yes

No

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

Yes

No

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

Yes

No

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).

PREA Audit notices were posted throughout the facility: Food Service, Medical, Religious Activity Center, Maintenance, Intake, Recreation, A unit Red Pod, A unit Brown Pod, A unit Green Pod, Law Library, B unit Red Pod, B unit Brown Pod, B unit Green Pod, E Unit Brown Pod, E Unit Green Pod, F Unit Green Pod, F Unit Brown Pod, F Unit Red Pod, Restricted Housing Unit Entry, C/D Corridor Entrance, D Unit Red Pod, D unit Brown Pod, D Unit Green Pod, Transition Activity Center, Upper Transition Activity Center, Laundry exchange, Visit room entry, Program Activity Center, Education, and Public Access area. OVCA POSTERS are throughout the facility: Food Service, Medical, Religious Activity Center, Maintenance, Intake, Recreation, A unit Red Pod, A unit Brown Pod, A unit Green Pod, Law Library, B unit Red Pod, B unit Brown Pod, B unit Green Pod, E Unit Brown Pod, E Unit Green Pod, F Unit Green Pod, F Unit Brown Pod, F Unit Red Pod, Restricted Housing Unit Entry, C/D Corridor Entrance, D Unit Red Pod, D unit Brown Pod, D Unit Green Pod, Transition Activity Center, Upper Transition Activity Center, Laundry exchange, Visit room entry, Program Activity Center, Education, and Public Access area. The Auditor tested the third-party reporting mechanism by emailing the address on the Washington State Department of Corrections website (docPREA@doc.wa.gov). The email was responded to in less than 24 hours. All appropriate procedures were followed. The Auditor also tested the third-party phone number (left a recorded message) the message was responded to in less than 24 hours. All appropriate procedures were followed. WADOC and Colorado DOC have established a means for offenders under their jurisdiction to report claims or allegations of sexual abuse, sexual assault or sexual harassment to the other party. The receiving party's sole function regarding such reports shall be to immediately forward them to the party with jurisdiction, who shall be responsible for investigating them. Envelopes

(pre-addressed and postage) are available to the population.

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.

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?

Yes

No

91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

The following is a sample of the documents requested during the onsite portion of the Audit. List of staff in the facility for selecting staff for interviews. List of incarcerated individuals by housing unit to select for interviews. Files of persons hired or promoted in the last 12 months to determine whether proper criminal record background checks and questions regarding past conduct were asked and answered. Documentation of background records checks of current employees at five-year intervals. Documentation of sexual abuse and harassment reports and investigations. Records for incarcerated individuals admitted to the facility within the past 12 months for evidence of appropriate screening within 72 hours. Records of initial assessment and reassessment for sexual victimization or abusiveness risk. Records of incarcerated individuals reassessed for risk of sexual victimization or abusiveness. Documentation of any monitoring efforts for incarcerated individuals or staff.

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
Inmate-on-inmate sexual abuse	5	0	5	0
Staff-on-inmate sexual abuse	1	0	1	0
Total	6	0	6	0

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
Inmate-on-inmate sexual harassment	3	0	3	0
Staff-on-inmate sexual harassment	6	0	6	0
Total	9	0	9	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
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

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

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

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
Total	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	3	0
Staff-on-inmate sexual harassment	0	4	2	0
Total	0	4	5	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:

6

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>5</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>9</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>3</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	6
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-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 staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
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.	<input type="radio"/> Yes <input checked="" type="radio"/> No

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 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 checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
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<p>Identify the name of the third-party auditing entity</p>	<p>Corrections Consulting Services</p>
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Standards	
Auditor Overall Determination Definitions	
<ul style="list-style-type: none"> • Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions) 	
Auditor Discussion Instructions	
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>	

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting 2. WADOC Policy DOC 490.850, Prison Rape Elimination Act (PREA) Response 3. CBCC Operational Memorandum CBCC 490.850, Prison Rape Elimination Act (PREA) Response 4. CBCC Operational Memorandum CBCC 490.800 PREA Prevention and Reporting 5. 115.11 CSU Org Chart 2023 6. Clallam Bay Corrections Center Organization Chart 7. 115.11 Position Description PREA Coordinator 8. PCM PD Position Description Correctional Program Administrator (PREA Compliance Manager)

Interviews conducted with:

1. PREA Coordinator
2. PREA Compliance Manager
3. Superintendent

The following policies were reviewed. WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, WADOC Policy DOC 490.850, Prison Rape Elimination Act (PREA) Response and CBCC Operational Memorandum CBCC 490.850, Prison Rape Elimination Act (PREA) Response. These policies provide the agency's and facility's approaches to preventing, detecting, and responding to sexual abuse and sexual harassment. It has definitions of prohibited behaviors and sanctions for those prohibited behaviors. The policies provide strategies and responses to reduce and prevent sexual violence. The policies also include procedural guidelines, such as screening Incarcerated Individuals upon intake, training (for both staff and incarcerated individuals), reporting procedures (both staff and incarcerated individuals), intervention procedures, and investigative guidelines. Finally, the policies provide for data collection and data reporting.

The Organization Charts for the Washington State Department of Corrections and the Clallam Bay Corrections Center were reviewed. The agency employs an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. This position is identified in the Washington State Department of Corrections Organization Chart. The Clallam Bay Corrections Center employs a Corrections Program Manager, who is the designated PREA Compliance Manager. The Corrections Program Manager oversees the facility's efforts to comply with the PREA Standards. The PREA Compliance Manager is identified in the Clallam Bay Corrections Center Organization Chart.

Interviews were conducted with the PREA Coordinator, the PREA Compliance Manager, and the Superintendent. The PREA Coordinator indicated she had enough time to coordinate the agency's PREA compliance efforts. The PREA Compliance Manager indicated she had enough time to coordinate the facility's PREA Compliance efforts. The PREA Coordinator and the PREA Compliance Manager were knowledgeable about the PREA standards. They articulated the vision of zero tolerance at the Clallam Bay Corrections Center and throughout the Washington State Department of Corrections.

The following observations were made during the on-site tour of the facility: The housing units had signs informing offenders of their right to be free of sexual abuse. There were signs in both English and Spanish informing offenders about reporting incidents of sexual abuse.

The following describes how the evidence above was used to determine compliance. The Clallam Bay Corrections Center has a zero-tolerance policy and training program that meets the requirements for this standard. The policies provide the facility's approach to preventing, detecting, and responding to sexual abuse and sexual

harassment. It has definitions of prohibited behaviors and sanctions for those prohibited behaviors. The policies provide strategies and responses to reduce and prevent sexual abuse.

The overriding approach by the Clallam Bay Corrections Center to eliminate or prevent sexual abuse and sexual harassment of its incarcerated individuals is to ensure uniformity of implementation of the agency's zero-tolerance policy in all areas of the facility, including providing definitions of prohibited behaviors regarding sexual abuse and sexual harassment and prescribing sanctions against staff and incarcerated individuals who engage in sexual abuse or sexual harassment. In the event of an allegation of sexual abuse or sexual harassment, Clallam Bay Corrections Center has developed a coordinated response plan that ensures the safety and security of the alleged victim while providing for a comprehensive and systematic investigation into the allegation.

The policies apply to all Washington State Department of Corrections staff, including employees, volunteers, contractors, and offenders at the Clallam Bay Corrections Center.

Clallam Bay Corrections Center utilizes the following strategies to reduce and prevent sexual abuse and sexual harassment at the facility:

1. Designating a staff member as the Clallam Bay Corrections Center PREA Compliance Manager, who will ensure that the Clallam Bay Corrections Center fully complies with all PREA standards.
2. Training staff (including contractors and volunteers) to detect sexual abuse and sexual harassment.
3. Screening for risk of sexual victimization and abusiveness.
4. Requiring all staff (including contractors and volunteers) to promptly report all reported or suspected sexual abuse, sexual harassment, and retaliation incidents.
5. Respond promptly and effectively to all reports of sexual abuse, sexual harassment, and retaliation by ensuring that staff (including contractors and volunteers) cooperates fully with any investigation.
6. Administer sanctions for those found to have participated in prohibited behavior.
7. Providing medical and mental health care to victims and abusers.
8. Performing an annual evaluation to assess how the Clallam Bay Corrections Center can improve its zero-tolerance policy and procedures.
9. Ensuring that the Clallam Bay Corrections Center is audited for PREA compliance.

The PREA Compliance Manager indicated she had enough time to manage and oversee the implementation of PREA standards. The Auditor reviewed several policies and the Clallam Bay Corrections Center Organizational Chart. The Auditor conducted a facility tour to evaluate posted information throughout the facility.

	<p>Interviews were conducted with the PREA Coordinator, the PREA Compliance Manager, and the Superintendent. The Superintendent supported the efforts of the PREA Coordinator and the PREA Compliance Manager.</p> <p>WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Policy 490.850, Prison Rape Elimination Act (PREA) Response, and CBCC Operational Memorandum CBCC 490.850, Prison Rape Elimination Act (PREA) Response, address 115.11 (a).</p> <p>The WADOC Correctional Operations Organization Chart, the Clallam Bay Corrections Center Organization Chart and the position descriptions for the PREA Coordinator and PREA Compliance Manager address 115.11 (b).</p> <p>The WADOC Correctional Operations Organization Chart, the Clallam Bay Corrections Center Organization Chart, and interviews with the PREA Coordinator, the PREA Compliance Manager and the Superintendent, address 115.11 (c).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.11: Zero tolerance of sexual abuse and sexual harassment; PREA coordinator.</p>
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115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting 2. 115.12 Contract shell 3-14 3. 115.12 Secretary memo 09-21-22 PREA 4. 115.12 3-24-22 Contract Monitoring 5. 115.12 RCW 72-01-410 6. 115.12 DOJ ruling on Pioneer 8-13 7. 115.12 Minnesota contract CDOP448 8. 115.12 Iowa contract K10681 9. 115.12 ABHS K10802 exp 6-30-2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Agency Contract Administrator <p>A review of the documentation submitted confirmed the agency requires other entities contracted with for the confinement of incarcerated individuals (privatized prisons and residential re-entry centers or "halfway houses") to adopt and comply</p>

with the PREA standards.

The Washington State Department of Corrections currently has contracts with multiple agencies to house incarcerated individuals. Contracts include the requirement to comply with PREA standards along with the ability to monitor that compliance. A process of self-evaluation and on-site visits coupled with a review of Department of Justice audit results was established to monitor these facilities during this audit cycle.

American Behavior Health Systems

The organization now operates residential substance abuse treatment facilities for individuals on supervision in the community. Individuals sanctioned to participate in a residential treatment program who fail to complete the program or violate program rules/specifications may have field supervision violated with possible incarceration as a sanction for that violation. The current contract with WADOC expires in June 2025.

Information about PREA is included on the organization's public website at <https://www.americanbehavioralhealth.net/prea/>. The information includes background, reporting, investigation, annual, and audit reports. The organization has also completed DOJ audits in the identified facilities. Final reports documenting 100% compliance have been received and are posted on the organization's public website.

Regular visits to the facilities by the contract administrator and discussions to collaboratively address any PREA-related issues continue.

The Washington State Department of Corrections has established or updated interstate compacts with Iowa and Minnesota since implementing the PREA standards.

The Iowa Department of Corrections has audited each facility during the two previous audit cycles, achieving 100% compliance. Audit reports are posted on the agency's public website at [https://doc.iowa.gov/administration/prea/prea audits](https://doc.iowa.gov/administration/prea/prea%20audits). The agency ensures that one-third of its facilities are audited yearly in compliance with PREA standard requirements. Reports for the most recent audits conducted in 2020, 2021, 2022 and 2023 are posted to the agency's public website.

The Minnesota Department of Corrections has audited each facility during the two previous audit cycles, achieving 100% compliance. Audit reports are posted to the agency's public website at <https://mn.gov/doc/about/prea-policy/>.

Compact facilities are closely monitored by the Classification and Case Management Administrator.

Each facility under contract with the Washington State Department of Corrections has contract language indicating that contractors shall develop policies and procedures for the establishment of a sexual abuse/ assault program and comply with the Prison Rape Elimination Act of 2003 and the national standards to prevent, detect and respond to prison rape as contained in 28 CFR Part 115, National Standards To Prevent, Detect, and Respond to Prison Rape; Final Rule, dated June 20, 2012. The contractor's policies and procedures are reviewed by subject matter experts who

	<p>ensure appropriate adherence to national standards and regulations.</p> <p>The Washington State Department of Corrections private contract facilities have undergone at least an initial national PREA Certification, with subsequent re-certifications every three years. According to the Contract Administrator, compliance results were timely submitted to the Washington State Department of Corrections.</p> <p>The Washington State Department of Corrections complies with Standard 115.12: Contracting with other entities for the confinement of offenders.</p>
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115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting 2. WADOC Policy 110.100 Prison Management Expectations 3. WADOC Policy 400.210 Custody Roster Management 4. WADOC Policy 420.370 Security Inspections 5. 2023 CBCC Staffing Plan Review - Final 6. 2022 CBCC Staffing Plan Review - Final 7. Unannounced Rounds all Units Part 1 8. Unannounced Rounds all units Part 2 9. 115.13 Custody Staffing Model revised 04-10-2023 10. 115.13 Program Closures 11. 115.13 Program Closure Laundry weather 12. 115.13 Non-custody staffing Model revised 04-01-2022 13. 115.13 Custody Roster examples <p>Interviews:</p> <ol style="list-style-type: none"> 1. PREA Compliance Manager 2. PREA Coordinator 3. Intermediate or higher-level Staff <p>The following policies were reviewed to determine compliance, WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section, VI, Policy 400.210 Custody Roster Management, I.B. and Directive I.B.; Section, II.D, Policy 110.100 Prison Management Expectations, Section, IV.A, and Policy 420.370 Security Inspections, Section, II.C. Additionally, the Staffing Plan for 2022 and 2023, memorandums, and Unannounced Round Logs and various reports listed above were reviewed.</p>

The Institution's PREA Compliance Manager reviews the Annual Staffing Plan Assessment. The PREA Compliance Manager reports the Clallam Bay Corrections Center supervisors, develop, document, and regularly comply with a staffing plan that provides adequate staffing levels.

The Auditor notes that the 11 factors identified for staffing plan development are addressed.

An interview was conducted with the PREA Compliance Manager concerning staffing levels, staffing reports, and unannounced rounds to determine compliance.

The Auditor observed appropriate staffing levels throughout the facility to determine compliance.

Clallam Bay Corrections Center implements a staffing plan that provides adequate staffing levels. The PREA Compliance Manager (Correctional Program Manager), the Superintendent, the Human Resource Manager, Captain, and a PREA Compliance Specialist review the staffing plan. The facility staffing plan is reviewed, including a vulnerability analysis that looks at the physical plant, video monitoring systems and the overall allocation of resources.

The Staffing plan review includes a review of any judicial findings (none) or inadequacies from federal investigative or internal/external oversight agencies (none). The plan reviews the facility's architectural weaknesses, the population statistics for the previous year, and an analysis of the population for the day on which the review took place.

The PREA Compliance Manager reports the facility documents and justifies all deviations from the staffing plan. Explanations for deviations from the staffing plan are documented if any deviations arise. The PREA Compliance Manager reports the most common reason for deviation was due to Staff required to facilitate the programming being absent.

The PREA Compliance Manager reviews the staffing plan to determine whether adjustments are needed, prevailing staffing patterns are considered, monitoring technology deployment is considered, and requests for video surveillance upgrades, if necessary, are made.

Intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Rounds are documented and cover all shifts. Facility policy does prohibit Staff from alerting other Staff of the conducting of such rounds. The Auditor reviewed the log books documenting unannounced rounds. The Superintendent, Correctional Program Manager, Captain, Correctional Unit Supervisors, Corrections Specialist 3, Corrections Specialist 2 and Sergeants conduct unannounced rounds throughout the institution, documenting the time each area is visited. The Auditor's review of the log books covering the time frames between 2021 - 2023 revealed substantial compliance with 115.1(d). Rounds cover the three shifts; the logs include the supervisor's signature and corresponding dates. The intermediate or higher-level staff interviewees indicate they have conducted

	<p>unannounced PREA rounds. The Supervisors reported that checks are always random, staggered, and never predictable to prevent Staff from alerting other Staff. During the facility tour, the Auditor queried Staff concerning a Supervisor's presence in the Unit. The Unit Officer indicated a Supervisor generally makes rounds during one of the three daily shifts.</p> <p>During the facility tour, the Auditor observed direct supervision in housing units. The Auditor observed staff members moving from room to room in program areas.</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section VI, Policy 400.210 Custody Roster Management, I.B. and Section, II.D, Policy 110.100 Prison Management Expectations, Section, IV.A, and Policy 420.370 Security Inspections, Section, II.C. the 2023 CBCC Staffing Plan Review, and the 2022 CBCC Staffing Plan Review address 115.13 (a)</p> <p>115.13 Program Closures, 115.13 Custody Staffing Model revised 04-10-2023, and 115.13 Non-custody Staffing Model revised 04-01-2022 address 115.13 (b).</p> <p>The 2023 CBCC Staffing Plan Review and the 2022 CBCC Staffing Plan Review address 115.13 (c).</p> <p>WADOC Policy 110.100 Prison Management Expectations, Section IV.A, and Policy 420.370 Security Inspections, Section II.C, Unannounced Rounds all units part 1 and 2, address 115.13(d).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.13: Supervision and monitoring.</p>
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115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. WADOC Policy 320.500 Youthful Offender Program 2. 115.14 RCW 72-01-410 3. 115.14 Agreement WADOC and WA Social and Health Services K10491 <p>The Clallam Bay Corrections Center houses adult males only. If a youthful individual arrived at the facility, it would be based on exigent circumstances, and the youthful individual would be placed where the individual's safety would be maintained, and a transfer to the appropriate reception center would immediately be requested.</p> <p>The Clallam Bay Corrections Center complies with Standard 115.14 - Youthful offenders.</p>

115.15 Limits to cross-gender viewing and searches

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

1. WADOC Policy 420.310 Searches of Offenders
2. WADOC Policy 420.312 Body Cavity Search
3. WA DOC Policy 320.265 Close Supervision Area
4. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting
5. WADOC Policy 490.700 Transgender, Intersex and Non-Binary Housing and Supervision
6. 115.15 CWC Past Searches training facilitators guide
7. 115.15 Information provided to staff for the doorbell system
8. 115.15 Pat Search Training excerpt
9. 115.15 Strip Search Logs July -Dec 2022
10. 115.15 Strip Search Logs 2023
11. 115.15 Unit Photos Male and Female staff present
12. 115.15 Staff training documentation

Interviews:

1. Random Staff
2. Random Incarcerated Individual

The PRE-Audit Questionnaire indicates that Cross-gender strip or visual body cavity searches would only be conducted in exigent circumstances. Strip searches of male offenders require one of the employees conducting the search to be male. If the second person conducting the strip search is female, she positions herself to observe the employee doing the strip search but is not in direct line of sight with the offender. The gender of the search officers is noted on the strip search log. As noted in the PRE-Audit Questionnaire, no cross-gender strip or cross-gender body cavity searches of incarcerated individuals were conducted at Clallam Bay Corrections Center during the audit period.

Strip searches, if warranted, are conducted by staff of the same sex as the offender and are based on reasonable suspicion. There is no instance at the Clallam Bay Corrections Center where a cross-gender strip search has been undertaken. Additionally, there have been no body cavity searches during the audit period.

The PRE-Audit Questionnaire indicates that all cross-gender strip searches are documented. The PRE-Audit Questionnaire indicates no cross-gender strip searches have occurred at the facility.

The PRE-Audit Questionnaire indicates that policies and procedures have been

implemented at the Clallam Bay Corrections Center that enable offenders to shower, perform bodily functions, and change clothing without a nonmedical staff of the opposite gender viewing their breasts and buttocks or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks.

According to WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section III, A: *"Individuals will be provided the opportunity to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. This includes viewing via surveillance systems"*.

Additionally, WADOC Policy 320.265 Close Observation Areas Section III, F states: *"Observation assignments will be conducted by an officer of the same gender as the individual, except in emergent situations. In the event of a cross-gender officer being assigned, a report will be completed by the Shift Commander in the Incident Management Reporting System (IMRS) before the end of shift. Distribution will include the Prison Rape Elimination Act (PREA) Coordinator"*.

The PREA Compliance Manager reports the Clallam Bay Corrections Center has implemented procedures that enable offenders to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their buttocks or genital area, except in exigent circumstances or when such viewing is incidental to routine rounds in the housing unit. All incarcerated individual interviewees stated they and their peers are never naked or in full view of opposite-gender staff when they shower, toilet, or change clothes.

As noted in WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting section VIII, C,

- *An announcement will be made by anyone who does not identify with the facility's gender designation, loud enough and often enough to reasonably be heard by the occupants of a housing unit, including the living area (e.g., where offenders sleep) or any common area designated for individuals to disrobe or change their clothing (e.g., bathrooms, showers). At a minimum, announcements will be made when anyone (e.g., staff, contractor/vendor, volunteer, facility guest) who does not identify with the facility's gender designation enters the living unit, and as follows: Announcements will be made verbally in Work/Training Releases and by using the doorbell system in Prisons. Verbal announcements may be made in Prisons when the doorbell system is not operational. Individuals will be informed of the purpose and use of doorbells in Prison.*

The Auditor observed female staff members announcing their presence when entering a housing unit and utilizing the doorbell system.

Eighteen incarcerated interviewees indicated female staff announced their presence when entering a housing area. Two incarcerated interviewees indicated female staff

	<p>sometimes announce their presence when entering a housing unit.</p> <p>The PRE-Audit Questionnaire indicates that Clallam Bay Corrections Center staff are prohibited from searching or physically examining a transgender/intersex offender to determine the offender's genital status. According to the PREA Compliance Manager, no such searches have been conducted during the audit period.</p> <p>All 12 random staff interviewees indicated the facility prohibits staff from searching or physically examining a transgender/intersex offender to determine the offender's genital status. All interviewees indicated they were well aware of the expectations.</p> <p>WADOC Policy 420.310 Searches of Offenders Section, III.D.F. and WADOC Policy 420.312, Section, II.B., III, address 115.15(a).</p> <p>WADOC Policy 420.310 Searches of Offenders, Section II. Routine Searches A-E. addresses 115.15(b).</p> <p>All strip searches and visual body cavity searches are documented. WADOC Policy 420.310 Searches of Offenders, section III, A-H, WADOC Policy 420.312 Body Cavity Search, section III A-F, 115.15 Strip Search Logs July-Dec 2022 and 115.15 Strip search logs 2023 addresses 115.15(c).</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section VIII A-C, and WADOC Policy 320.265 Close Observation Areas Section III, F address 115.15(d).</p> <p>WADOC Policy DOC 490.700, Transgender, Intersex and/or Non-Binary Housing and Supervision, Section IX, E indicates staff is prohibited from searching or physically examining a transgender or intersex incarcerated individual to determine the offender's genital status. Interviews with staff members indicate staff members are not allowed to search or physically examine a transgender or intersex person to determine the offender's genital status. Policy 490.700 and interviews with staff address 115.15 (e).</p> <p>The PRE-Audit Questionnaire indicates that all staff members have received training on conducting pat-down searches. The Auditor reviewed the Training Curriculum and the staff training rosters, indicating the participation of the staff. The Clallam Bay Corrections Center complies with 115.15 (f).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.15: Limits to cross-gender viewing and searches.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Documents:

1. WADOC Policy 310.000 Orientation
2. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting
3. WADOC Policy 450.500 Language Services for Limited English-Proficient Individuals
4. WADOC Policy 690.400 Individuals with Disabilities
5. 115.16 Curriculum for ADA Training
6. 115.16 contract 03514 Interpreter Services Spoken
7. 115.16 Deaf Services position description
8. 115.16 Excerpt of Incarcerated Individual Handbook (Spanish)
9. 115.16 Facilitator guide for offenders with limited intellect capabilities
10. 115.16 PREA Language Services
11. 115.16 PREA Orientation script English and Spanish
12. 115.16 PREA Prison Poster Spanish
13. 115.16 PREA Spanish Brochure

Interviews:

1. Intake Staff
2. Random Incarcerated Individual
3. Random Staff

The following policies were reviewed: WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, WADOC Policy 310.000 Orientation, WADOC Policy 450.500 Language Services for Limited English Proficient Individuals, and WADOC Policy 690.400 Individuals with Disabilities. In addition, the following documents were reviewed: 115.16 Curriculum for ADA Training, 115.16 Contract 03514 Interpreter Services Spoken, 115.16 Deaf Services position description, 115.16 Excerpt of Incarcerated Individual Handbook (Spanish), 115.16 Facilitator Guide for offenders with limited intellect capabilities, 115.16 PREA Language Services, 115.16 PREA Orientation script English and Spanish, 115.16 PREA Prison Poster Spanish and 115.16 PREA Spanish Brochure.

Individuals sentenced to the Washington State Department of Corrections will undergo an initial reception, admission, and orientation process at the Washington Corrections Center (WCC) or Washington Corrections Center for Women (WCCW) Reception Diagnostic Centers (RDCs) unless exceptional circumstances exist. All offenders will participate in interviews, testing, and other activities related to the admission process at the receiving facility. Newly committed individuals will be screened and assessed within 24 hours of arrival, including Prison Rape Elimination Act risk assessments to determine housing and programming assignments.

The Washington State Department of Corrections provides orientation material to all offenders. PREA information is an important component in the orientation process. The material is provided in a manner that is clearly understood. The Washington

State Department of Corrections has provisions for offenders who have deafness or are hard of hearing (written materials and American Sign Language contractors); blindness or low vision (a video in which PREA information is read aloud); PREA material was also available through one-to-one discussion with the offender's Counselor; have intellectual disabilities (one-to-one housing unit counselor consultation); have psychiatric disabilities (Mental Health and Medical staff were available onsite with individualized treatment services available); have speech disabilities (onsite Counselor and educators were available to discuss PREA- specific questions); and have any other not previously identified impairments (i.e., any exceptional situation involving difficulty in communication), referral would be made to consult with the PREA Compliance Manager.

The Auditor reviewed samples of PREA Posters in both English and Spanish. These PREA Posters were located in every housing unit and contained information concerning at least four methods to report sexual abuse and sexual harassment incidents.

An interview was conducted with one staff member who conducted initial intake interviews. The Auditor observed the information provided concerning PREA and had staff explain what procedures would be followed if an offender was experiencing difficulty understanding the material. Intake information is available in English and Spanish. The intake staff members are prepared to provide information in a format that will allow offenders with limited reading skills, hearing disabilities, intellectual disabilities, or low vision to know and understand all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Staff members will read information to the offenders for those with limited reading skills.

Intake staff indicated they provided PREA information to offenders and took the time to ensure they understood the material. The staff indicated they were prepared to provide information concerning the entire intake process to offenders who were blind or Deaf. The Auditor observed Orientation for several new incarcerated individuals. This Orientation took place within 24 hours of the individuals' arrival at the facility. The Intake Counselor opened the session with an introduction and explained the purpose of the Orientation process. The Counselor then provided each incarcerated individual with a pamphlet explaining the Prison Rape Elimination Act and the Washington State Department of Corrections zero tolerance for sexual abuse and sexual harassment. The Counselor reviewed and read each section of the pamphlet to the Incarcerated Individuals. The first section explains the reporting methods; there are five reporting methods listed in the pamphlet:

- Verbally tell a staff member.
- Call the PREA Hotline at 0-800-586-9431.
- Submit a kite, kiosk message or grievance. (PREA reports received via grievance will be removed from the grievance process and addressed as a PREA allegation.)
- Send legal mail addressed to the State Attorney General, law enforcement or the PREACoordinator at Headquarters.

- Submit a Report of Prison rape Elimination Act Allegation form (available in your living unit or the library)

The next section in the pamphlet provides information on Victim Services. In addition to medical and mental health services, Victim advocacy services are also available.

The PREA Hotline number is in bold, easy-to-read print in the pamphlet.

The Intake Counselor then explained PREA and the importance of reporting staff sexual misconduct and incarcerated individual sexual misconduct. Finally, the Intake Counselor explained how an incarcerated individual can prevent sexual assault.

In addition to written and visual education materials, the Clallam Bay Corrections Center has agreements with interpreters to provide effective communication with offenders who do not understand English. The Clallam Bay Corrections Center does not rely on offender interpreters.

WADOC Policy 450.500 Language Services for Limited English Proficient Individuals states: *"The Department will provide oral interpretation (i.e., telephonic, in-person, video remote) and written translation services through Department and/or contract services at all facilities. The Department will also provide guidelines for interpretation and translation services for Limited English Proficiency (LEP) individuals under the Department's jurisdiction"*.

WADOC Policy 310.000 Section III.G states,

- *When a literacy, language, or other cognitive/comprehension concern exists, employees will assist the individual in understanding the material per DOC 450.500 Language Services for Limited English Proficient Individuals. Spanish-speaking individuals will attend a Spanish version of the orientation program and be notified of available Spanish-translated materials and services. Each facility will develop processes for non-Spanish speaking Limited English Proficiency individuals, including those requiring sign language interpretation, to receive Orientation in a language they understand.*

WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, WADOC Policy 450.500 Language Services for Limited English Proficient Individuals, WADOC Policy 690.400 Individuals with Disabilities and WADOC Policy 310.000 Orientation address 115.16(a).

WADOC Policy 310.000 Section III.G. and WADOC Policy 450.500 Language Services for Limited English Proficient Individuals, Section, Policy I., Directive I.D., E., II.A.1., B, III.C., D. Attachment 2, address 115.16(b).

The Clallam Bay Corrections Center does not utilize offender interpreters. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, section III A. 1. Addresses 115.16(c).

The Clallam Bay Corrections Center complies with Standard 115.16: Incarcerated

	Individuals with Disabilities and Incarcerated Individuals with limited English proficiency.
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115.17	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 810.800 Recruitment, selection and promotion 2. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting 3. WADOC Policy 400.320 Terrorism-extremism activity 4. WADOC Policy 810.015 Criminal Record disclosure and fingerprinting 5. DOC 03-506 6. DOC 03-068 7. 115.17 Staff Tracker 8. 2023 Contract staff hiring 9. 115.17 PREA LC disclosure 10. Employee Record Worksheet <p>Interviews:</p> <ol style="list-style-type: none"> 1. Human Resources staff <p>The PRE-Audit Questionnaire indicates agency policy prohibits hiring or promoting anyone who may have contact with offenders and prohibits enlisting the services of any contractor who may have contact with offenders who:</p> <ul style="list-style-type: none"> • Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; • 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 • Has been civilly or administratively adjudicated to have engaged in the activity described above. <p>The Auditor's review of form DOC 03-506 (Rev: 02/06/20) reveals the three questions articulated in 115.17(a) are addressed. Additionally, WADOC Policy 810.800 Recruitment, selection and promotion, Section II.A.2, and WADOC Policy 490.800</p>

Prison Rape Elimination Act (PREA) Prevention and Reporting, Section, I.A.2., address 115.17(a).

The Human Resources interviewee asserts the facility considers prior incidents of sexual harassment when determining whether to hire or promote anyone or to enlist the services of any contractor who may have contact with offenders. WADOC Policy 810.800 Recruitment, selection and promotion Section, II.A.3. address 115.17(b).

The Human Resources interviewee asserts the facility performs criminal background record checks, consults appropriate child registries in the state or locality in which the employee will work, or considers pertinent civil or administrative adjudications for all newly hired employees who may have contact with offenders and all employees who may have contact with offenders, who are considered for promotions. WADOC Policy 810.015 Criminal Record Disclosure and Fingerprinting states a background check will be completed for all applicants before an initial appointment or rehire. Once appointed, criminal background checks will be performed at least every five years. The same procedure applies to contractors who may have contact with offenders.

WADOC Policy 810.800 Recruitment, Selection and Promotion section, II.A.2. & 4 and WADOC Policy 810.015 Criminal Record disclosure and fingerprinting, address 115.17 (c).

As noted in the Pre Audit Questionnaire, the number of persons hired in the past 12 months who may have contact with offenders who have had criminal background record checks is 95. The Auditor reviewed four new hire employee files, and criminal background checks were completed on each of the four new hires.

Background checks are completed every five years for current employees. The Auditor reviewed the data for tracking employees' background investigations. All employees listed in the data tracking sheet had completed background checks within the required time frame. Employees who fail to disclose information concerning misconduct can be terminated from employment. The Human Resources staff confirmed that background checks are completed every five years and that appropriate sanctions are available for staff members who fail to report misconduct. The Auditor reviewed five requests for criminal history for contractors'. The contractors reviewed had completed background checks within the required time frame.

As indicated by the Human Resource Staff, any deception, misinformation, or omission of information during the application and Employment Screening Process shall disqualify the applicant from employment.

The Background investigation includes a review of criminal history. Any applicant with a criminal/traffic conviction history or a criminal/illegal activity history shall typically be disqualified from employment. Any conviction of any crime consisting of engaging or attempting to engage in sexual activity in the community by using force, overt or implied threats of force or coercion is disqualified from employment.

WADOC Policy 810.800 Recruitment, Selection and Promotion Section, II.A.2. & 4 and

WADOC Policy 810.015 Criminal Record Disclosure and Fingerprinting, address 115.17 (d) and (e).

Sexual Misconduct and Institutional Employment/ Service Disclosure form DOC 03-506 are completed before an appointment can be made. All applicants scheduled for an interview must complete this form before or at the time of the interview. The Sexual Misconduct and Institutional Employment form contains the following questions:

- *Have you ever engaged in sexual abuse in a prison, jail lockup, community confinement facility, juvenile facility, or institutional setting?*
- *Have you ever been civilly or administratively adjudicated (there was a formal finding, and a judgment or decision was rendered in a civil or administrative proceeding) or otherwise found to have engaged or attempted to engage in sexual abuse/assault in any setting?*
- *Have you ever been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?*
- *Have you been the subject of substantiated allegations of sexual abuse or sexual harassment or resigned during a pending investigation of alleged sexual abuse or sexual harassment?*
- *Have you ever engaged in any other incident of sexual harassment or sexual misconduct not already addressed above?*

Failure to fully divulge criminal information on the part of an individual subsequently employed, promoted, or authorized to provide services for the Department may cause disciplinary action, including dismissal or termination of services. Employees who fail to report an arrest, criminal citation, or any other court imposed sanction or condition that may affect their fitness for duty or the agency's program may be subject to disciplinary action, including dismissal.

Sexual Misconduct and Institutional Employment/ Service Disclosure form DOC 03-506 and WADOC Policy 810.800 Recruitment, selection and promotion Section, II.A.2 address 115.17 (f) and (g).

All applicants and candidates for promotion must sign the WADOC release of information document (DOC 03-068). This release of information allows WADOC to contact other employers. Employers who contact the Clallam Bay Corrections Center are directed to the PREA Compliance Manager responsible for facility-to-facility applicant information requests.

WADOC Release of Information Document (DOC 03-068) addresses 115.17 (h).

The Clallam Bay Corrections Center complies with Standard 115.17: Hiring and promotion decisions.

115.18	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting <p>Interviews:</p> <ol style="list-style-type: none"> 1. Agency Head 2. Superintendent <p>In planning a substantial expansion or modification of existing facilities, the Washington State Department of Corrections hires a consultant who has expertise in the design of correctional facilities and understands the importance of offender and staff safety. The Agency provides consultants instructions based on approved program and pre-design documents; WADOC policies, standards, guidelines and specifications, including the Prison Rape Elimination Act (PREA), are included in the pre-design documents.</p> <p>The Agency Head stated that the Washington State Department of Corrections considers how modifications or expansions to a facility affect the ability to protect offenders from sexual abuse. The Agency Head stated that the PREA guidelines are considered in new facility designs. He further indicated technology upgrades enhance the Agency's ability to protect against sexual abuse. According to the Agency Head, all substantiated and unsubstantiated cases of offender sexual abuse are reviewed to determine if modifications to design or the addition or upgrade of technology would help prevent a similar occurrence.</p> <p>During the on-site phase of the audit, the Auditor interviewed the Superintendent. During the interview, the Superintendent confirmed that when planning any expansion or modification of existing facilities, the facility considers the effect of the design, expansion, or modification on the facility's ability to protect offenders from sexual abuse.</p> <p>During the on-site tour of the facility, the Auditor observed convex mirrors in housing areas, maintenance, and throughout the facility. The Auditor notes the Clallam Bay Corrections Center has 170 mirrors throughout the facility. These mirrors are strategically placed to alleviate areas where there are blind spots. The mirrors supplement the Clallam Bay Corrections Center's video surveillance system.</p> <p>The Clallam Bay Corrections Center has 1286 cameras operating on a Genetec Security Desk software system and has a video retention of 30 days on the server. No video surveillance was directed into areas where incarcerated individuals may be</p>

	<p>visible in showering, toileting or changing clothing.</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section VII.B. and interviews conducted with the Agency Head and the Superintendent address 115.18 (a) and (b).</p> <p>There has been no substantial expansion or modification at the Clallam Bay Corrections Center since the last PREA audit.</p> <p>The Clallam Bay Corrections Center complies with Standard 115.18: Upgrades to facilities and technologies.</p>
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115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. 600.000 Heath Services Management 2. 610.025 Health Services Management of Alleged Sexual Misconduct Cases 3. 600.025 Health Care Copayment Program 4. 490.860 Prison Rape Elimination Act Investigation 5. 490.850 Prison Rape Elimination Act Response 6. 115.21 Advocate Selection excerpt 7. 115.21 Advocate Training Requirements excerpt 8. 115.21 Forensic Medical Exam Procedures - Transport Staff Procedures 11-2014 9. 115.21 Forensic Medical Exam Procedure for DOC Health Care Staff 10-2014 10. 115.21 In-person advocacy guide 10-23-15 11. 115.21 Memo from Health Services Asst Secretary 12. 115.21 K11494 OCVA expires 06-30-2025 13. 115.21 K8487 WSP MOU exp 06-30-2025 14. 115.21 National Protocol excerpt 04-13 15. 115.21 OCVA-JDI-support-Poster English 16. 115.21 OCVA-JDI-support-Poster Spanish 17. 115.21 Webinar transcript in-person advocacy 18. 115.21 Uniform Evidence Protocol 07-2016 19. 115.21 Recommendations for Administrators excerpt 08-13 20. 115.21 OCVA Brochures English and Spanish 21. Annual LE Meeting 2023-01-25 22. PREA Designated advocates <p>Interviews:</p>

1. PREA Compliance Manager
2. Medical Staff
3. Investigator
4. Community Advocate

Administrative investigations are conducted by specially trained Washington Department of Corrections staff. Clallam County Sheriff's Office conducts criminal investigations. If the Clallam County Sheriff's Office declines to conduct an investigation, the facility can make a referral to the Washington State Patrol. The Auditor's review of the MOU with the Washington State Patrol, a review of the Annual Law Enforcement Meeting notes and the National Protocols for Sexual Assault Medical Forensic Exams Adult/adolescent and WADOC 490.850 Prison Rape Elimination Act Response, and WADOC 490.860 Prison Rape Elimination Act Investigation, provides evidence to satisfy the requirements of 115.21 (a) and (b).

Any incarcerated individual alleging sexual assault, sexual abuse, and staff sexual misconduct will be referred to a healthcare provider to evaluate any injury. When clinically indicated, medical and mental health treatment services and follow-up care will be provided. Forensic medical examinations will be conducted at a community health care facility. The Clallam Bay Corrections Center provides all victims of sexual abuse access to forensic medical examinations at Forks Memorial Hospital in Forks, Washington. Forks Memorial Hospital provides comprehensive treatment for sexual assault victims through collaboration between the hospital, law enforcement agencies, forensic nurse specialists and sexual assault counseling advocates. These services are provided without cost to the victim. As noted in RCW 7.68.170, No costs incurred by a hospital or other emergency medical facility for the examination of the victim of a sexual assault, when such examination is performed to gather evidence for possible prosecution, shall be billed or charged directly or indirectly to the victim of such assault. The Auditor notes that no Clallam Bay Corrections Center offenders have participated in a forensic examination in the past 12 months.

WADOC 610.025 Health Services Management of Alleged Sexual Misconduct Cases, Policy I, WADOC 490.850, Prison Rape Elimination Act Response III.B.4. and RCW 7.68.170 provides evidence to satisfy the requirements of 115.21 (c).

The Washington State Department of Corrections has established offender advocacy support through an interagency agreement with the Department of Commerce, Office of Crime Victim Advocacy (OCVA). The designated advocacy support center for the Clallam Bay Corrections Center is Mariposa House (Forks Abuse Program). (see PREA Designated advocates). Specially designated and trained advocates respond to the community health care facility whenever an incarcerated individual is transported for a forensic medical examination. Upon reporting a sexual assault, sexual abuse, or staff sexual misconduct, the alleged victim has a right to legal advocacy for support. When an investigation is conducted, an advocate is made available to present with the alleged victim while meeting with the investigator during any investigatory interviews. The Shift Commander maintains a point of contact list and will notify one of the contact points to ensure the advocate has been scheduled if the alleged victim

does not decline to have an advocate. Clallam Bay Corrections Center has identified the PREA Compliance Manager and the PREA Compliance Specialist as the contact points in case such an investigation occurs.

Mariposa House services include crisis intervention, assessment of needs, referral to additional resources, and medical and legal advocacy. The medical and legal advocacy framework has many varied tasks or functions, such as accompaniment to the medical forensic exam, explanation of the exam proceedings, advocacy on behalf of the victim/survivor in asserting their choices for aspects of the exam, treatment, etc. Presence and support for incarcerated individuals who have undergone a sexual assault forensic medical exam; investigatory interviews, depositions, and other legal proceedings; advocacy for fulfilling victim rights in these processes; accompaniment, support, and information during any resulting criminal or civil proceedings.

WADOC Policy 490.800, XI A-F, Community Victim Advocates and the MOU with the Office of Crime Victims Advocacy (K11494 OCVA), the Advocate Training Requirements, the Office of Crime Victims Advocacy Brochures and the training curriculum provide evidence to support 115.21 (d) and (e) and (h).

The Washington State Department of Corrections is responsible for conducting all administrative investigations related to PREA. Washington Administrative Code (WAC) 137-28-190 states, "The Superintendent should report any felony under state or federal law committed in a facility to law enforcement." The Clallam County Sheriff's Office is the primary investigator for a crime committed within Clallam Bay Corrections Center. If the local agency refuses to investigate, the facility can make a referral to the Washington State Patrol (WSP). The WSP Crime Scene Response Unit is available to all local agencies should they request services. The Washington State Department of Corrections maintains a memorandum of understanding with WSP for conducting investigations in general.

The WADOC Policy 490.800, IV, the Washington State Patrol Memorandum of Understanding (WSP MOU), and the Annual Law Enforcement Meeting 2023 provide evidence to satisfy 115.21 (f).

The Clallam Bay Corrections Center complies with Standard 115.21: Evidence protocol and forensic medical examinations.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documents: <ul style="list-style-type: none"> 1. 490.800 Prison Rape Elimination Act Prevention and Reporting

2. 490.860 Prison Rape Elimination Action Investigation
3. Law Enforcement Meeting 2023-01-25
4. 115.22 K8487 WSP MOU

Interviews:

1. PREA Compliance Manager
2. Investigator

WADOC Policy 490.860 Prison Rape Elimination Act (PREA) Investigation states the Department will thoroughly, promptly, and objectively investigate all allegations of sexual misconduct involving offenders under the jurisdiction or authority of the Department. The Policy ensures the completion of administrative or criminal investigation for all allegations of sexual misconduct, even if the offender is no longer under the Department's jurisdiction or the Department's accused staff is no longer employed.

The investigator and the PREA Compliance Manager assured the Auditor that all sexual abuse or harassment allegations were investigated.

As reported in the Pre Audit Questionnaire, in the past 12 months, the number of allegations of sexual abuse and sexual harassment received was thirteen. The number of allegations resulting in an administrative investigation is thirteen, and the number of allegations referred for criminal investigation was three.

WADOC 490.800 Prison Rape Elimination Act Prevention and Reporting, Section IV, and 490.860 Prison Rape Elimination Act Investigation, Policy I.& II Directive I. A. 3. address 115.22 (a).

The PREA Compliance Manager documents all investigations and maintains digital records in the Incident Management Reporting System, a subfolder in the overall Incarcerated Individual Management Network Information System. Access to this data is restricted. The collection of this data provides the basis for the PREA Annual Reports.

Washington State Department of Corrections staff do not have law enforcement powers or certification and, as such, are not authorized to conduct any criminal investigation. An allegation that appears to be criminal is referred to local law enforcement, and each facility has identified a local law enforcement agency as its primary investigative Agency for criminal investigations. If that Agency declines to investigate, the facility can make a referral to a secondary agency. The Washington State Department of Corrections maintains an agreement with WSP for assistance as needed/requested. Each Superintendent meets with local law enforcement officials annually to discuss investigation processes and review procedures.

WADOC 490.860, Prison Rape Elimination Act Investigation Policy I.B., I.A.3, the Annual Law Enforcement Meeting and the WSP Memorandum of Understanding address 115.22 (b) and (c).

	<p>The Agency's Policy regarding the referral of sexual abuse and sexual harassment allegations for criminal investigation is published on the Agency website. The Auditor reviewed the Agency's website, including information about processing administrative and criminal PREA allegations. Policy 490.800 Prison Rape Elimination Act Prevention and Reporting and 490.860 Prison Rape Elimination Act Investigations are on the Agency website.</p> <p>The Clallam Bay Corrections Center complies with Standard 115.22: Policies to ensure referrals of allegations for investigations.</p>
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115.31	Employee training
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 2. 115.31 PREA 101 Online Training 3. 115.31 PREA 102 Facilitator Guide 4. 115.31 PREA Coordinator Explanatory Memorandum 5. 115.31 Staff Training Tracker 6. 115.31 Training Transcripts 7. Employee Record Worksheets <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff <p>The following policy and other documentation were reviewed: WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, PREA 102 Facilitator Guide, PREA 101 Online Training, the PREA Coordinator Explanatory Memorandum and various training records. The Auditor reviewed Employee Training, Contractor Training, and the staff training datasheet.</p> <p>Interviews were conducted with 12 random staff.</p> <p>The Auditor observed several informational signs throughout the facility detailing how to report sexual assault or sexual harassment. In addition, the Auditor saw staff announcing their presence before entering a housing unit. Finally, the Auditor interviewed staff to determine their knowledge and understanding of their training.</p> <p>The Clallam Bay Corrections Center trains employees on zero tolerance and an employee's responsibilities to prevent, detect, report, and respond to sexual abuse and harassment incidents. Employees are informed of the offenders' right to be free</p>

from sexual abuse and retaliation for reporting sexual abuse and harassment incidents. Employees are trained on the dynamics of sexual abuse in confinement, the reactions of victims, and how to detect sexual abuse. Employees receive training on standards of conduct, inappropriate relationships with offenders, and communication with all offenders effectively. In addition, mandatory reporting laws are reviewed. The general PREA training curriculum includes but is not limited to all elements required by this standard. The Learning Center online program provides initial training for new employees. Annual PREA training is provided through the Learning Center. All employees have been trained; they are trained annually, and the Auditor confirmed the employees' training records. All staff interviewed confirmed their participation in PREA training and knowledge of the training curriculum.

Employees are aware of the Clallam Bay Correction Centers' current sexual abuse and sexual harassment policies and standard operating procedures. Clallam Bay Corrections Center documents that employees understand the training they have received.

The Auditor reviewed ten Employee Training records, and each file contained documentation on the date of hire, PREA Training Dates, and Acknowledgement documents.

Staff members interviewed by the Auditor indicated a clear understanding of the Prison Rape Elimination Act. The random staff interviewed could recall information from the training, such as the zero tolerance for sexual assault and sexual harassment, professional and gender-specific pat search procedures, how to respond to sexual assaults and the first responder's duties. Staff members recalled how to avoid inappropriate relationships with offenders, the dynamics of sexual abuse in prison, and how to detect signs of sexual abuse. All staff interviewed confirmed their participation in PREA training and knowledge of the training curriculum.

The Washington State Department of Correction uses online training through the Learning Center for selected training courses. This ensures consistent and efficient information is provided to employees, contract staff and volunteers. Annual in-service PREA training is delivered using this medium.

The Learning Center tracks participation, scores obtained on quizzes, and completion of training requirements. A function within this system requires participants to answer "True" or "False" to the following statement.

- *I am verifying that I have viewed and understand all sections of the PREA training course.*

The PREA Coordinator receives a daily report from the Training and Development Unit if any employee answers false to this statement. If a false answer is provided, the appropriate Supervisor is notified. The Supervisor must review the information with the individual to resolve the potential conflict. If the false response was in error, the individual is required to retake the Learning Center segment.

	<p>By incorporating these self-disclosure questions into the Learning Center, the Agency can ensure a higher participation and compliance rate and generate more reliable documentation.</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, section X.B. address 115.31(a).</p> <p>The PREA 102 facilitator guide, PREA 102 training curriculum and PREA 101 Online Training curriculum address 115.31(b).</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, section X.B addresses 115.31(c)</p> <p>Training Records with electronic signatures, address 115.31(d).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.31: Employee training.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting 2. WADOC Policy 530.100 Volunteer Program 3. 115.32 Brochure Staff, Contractors, Volunteers 4. 115.32 PREA 101 online training 5. 115.32 PREA 102 facilitator guide 6. 115.32 Training for Contractors and Volunteers 7. 115.32 PEA Coordinator Explanatory Memorandum 8. Contract Staff Training Transcripts (5) 9. 03-523 Forms Random Volunteer Training Records (4) <p>Interviews:</p> <ol style="list-style-type: none"> 1. Contractor Education 2. Contractor Education <p>The documentation listed above was reviewed to determine compliance. The Auditor reviewed the Volunteer/Contractor training forms; participation in training is documented through signature and indicates that the volunteer/contractor understood the training they have received.</p>

	<p>The Auditor reviewed the training material and the documentation each contractor or volunteer must complete. Clallam Bay Corrections Center trains the volunteers and contractors on zero tolerance and responsibilities to prevent, detect, report, and respond to sexual abuse and harassment incidents. Volunteers and Contractors are informed of the incarcerated individuals' right to be free from sexual abuse and retaliation for reporting sexual abuse and harassment incidents. Volunteers and Contractors are trained on the dynamics of sexual abuse in confinement, the reactions of victims, and how to detect sexual abuse. Standards of Conduct are reviewed, as well as inappropriate relationships with incarcerated individuals and how to communicate with all incarcerated individuals effectively. The Auditor interviewed two contractors. Each of the contractors had received training within the past 12 months. Each was able to recall information from the training, such as responsibilities for recognizing potential sexual harassment issues or sexual assault issues, their responsibility to report any concerns, inappropriate relationships, and zero tolerance.</p> <p>WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, section X.B., WADOC Policy 530.100 Volunteer Program, III A-C and the Brochure staff contractors volunteers, the PREA 102 facilitator guide, and the PREA 101 online training address 115.32(a) and (b)</p> <p>Training Records for Contractors and Volunteers address 115.32(c).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.32: Volunteer and contractor training.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 310.000 Orientation 2. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 3. WADOC Policy 450.500 Language Services for LEP Individuals 4. 115.33 Prison English Brochure 5. 115.33 Prison Spanish Brochure 6. 115.33 PREA orientation script English and Spanish 7. 115.33 PREA Prison Poster Spanish 8. 115.33 PREA Prison Posters English

9. 115.33 PREA Posters English and Spanish
10. 115.33 Low comp Facilitator guide
11. 115.33 Individual Comic Charlie
12. 115.33 Statewide Orientation Handbook 2021
13. 115.33 PRA Tracking spreadsheet
14. CBCC Orientation Handbook
15. Orientation checklist examples
16. Inmate Records Worksheet
17. Site Review Checklist

Interviews

1. Intake staff
2. Staff who conduct Risk Assessments
3. Incarcerated Individuals

The Auditor reviewed the following documentation: WADOC Policy 310.000 Orientation, WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, 115.33 Prison English Brochure, 115.33 Prison Spanish Brochure, 115.33 PREA orientation script English and Spanish, 115.33 PREA Prison Poster Spanish, 115.33 PREA Prison Posters English, 115.33 Low comp Facilitator guide, 115.33 Individual Comic Charlie, 115.33 Statewide Orientation Handbook 2021, CBCC Orientation Handbook, and the Orientation checklist examples.

Interviews were conducted with intake staff, staff who conduct Risk Assessments, and incarcerated individuals.

The following observations were made during the on-site tour of the facility: Throughout the facility, there is information about PREA, Zero Tolerance, and how to report incidents of sexual abuse. This information is presented in both Spanish and English. This information is visible and readily available.

Incarcerated Individuals receive information on zero tolerance, how to report sexual abuse and harassment incidents, their right to be free from sexual abuse and harassment, and to be free from retaliation for reporting incidents. In addition, offenders are informed about how the Clallam Bay Corrections Center will respond to such events. (WADOC Policy 310.000 Orientation, Section III A-H, WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section XII A-F).

Intake Staff interviews verify that offenders receive the appropriate information. In addition to this information, incarcerated individuals are provided a handbook that includes information concerning Zero Tolerance and how to report sexual abuse and harassment. The Auditor reviewed the Statewide Incarcerated Individual Handbook English; the Handbook lists the policies related to PREA, a brief description of the information in the policies, a discussion about Zero-Tolerance, Investigations, referrals to law enforcement, discipline for sexual misconduct and the prohibition against retaliation for involvement in reporting. As noted in the Handbook, “*Consensual,*

non-coerced sexual activity between offenders is prohibited by Department rules and policies and may result in an infraction, but it is not defined as a violation of PREA policies or law.” Definitions related to sexual misconduct are provided, and finally, offenders are informed about how to report allegations; the Handbook provides seven methods to report and information concerning third-party reporting. The Auditor confirmed that offenders received this information, copies of the database listing the offenders' orientation date were provided, and copies of DOC 21-992 signed by offenders indicating receipt of the Handbook and the following information:

- *Video & Discussion; DOC 490.800 Prevention and Reporting of Sexual Misconduct, DOC 490.850 Response to and Investigation of Sexual Misconduct, related Operational Memorandums, the Prison Rape Elimination Act of 2003, and other applicable state or federal laws, including potential criminal penalties; Department zero tolerance stance, definitions and examples of prohibited and illegal behaviors that might constitute sexual misconduct, self protection strategies, prevention and intervention, sexual harassment, examples of conduct, circumstances, and behaviors that may be precursors to sexual misconduct; various ways sexual misconduct may be reported, that all allegations of sexual misconduct are taken seriously and investigated thoroughly, confidentiality in cases of sexual misconduct, treatment and counseling, staff requirement to report allegations, protection against retaliation and, and disciplinary actions for making false allegations.*

When incarcerated individuals complete orientation, they sign the DOC 21-992 Prison Orientation Checklist, which is scanned into OnBase (an electronic document warehouse). In addition, documentation of orientation completion is entered as a certificate in the Offender Management Network Information (OMNI) system.

The Auditor observed Orientation for several incarcerated individuals. This Orientation took place within 24 hours of the individuals' arrival at the facility. The Intake Counselor opened the session with an introduction and explained the purpose of the Orientation process. The Counselor then provided each incarcerated individual with a pamphlet explaining the Prison Rape Elimination Act and the Washington State Department of Corrections zero tolerance for sexual abuse and sexual harassment.

The Counselor reviewed and read each section of the pamphlet to the Incarcerated Individuals. The first section explains the reporting methods; there are five reporting methods listed in the pamphlet:

1. Verbally tell a staff member.
2. Call the PREA Hotline at 0-800-586-9431.
3. Submit a kite, kiosk message or grievance. (PREA reports received via grievance will be removed from the grievance process and addressed as a PREA allegation.)
4. Send legal mail addressed to the State Attorney General, law enforcement or the PREACoordinator at Headquarters.
5. Submit a Report of Prison rape Elimination Act Allegation form (available in

your living unit or the library)

The next section in the pamphlet provides information on Victim Services. In addition to medical and mental health services, Victim advocacy services are also available.

The PREA Hotline number is in bold, easy-to-read print in the pamphlet.

The Intake Counselor then explained PREA and the importance of reporting staff sexual misconduct and incarcerated individual sexual misconduct. Finally, the Intake Counselor explained how an incarcerated individual can prevent sexual assault.

Interviews with incarcerated individuals also confirm that Clallam Bay Corrections Center Staff provides information on reporting incidents of sexual abuse.

Interpretation services are offered to offenders who may not understand the presented material. PREA education is provided in formats accessible to all incarcerated individuals, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, and offenders who have limited reading skills. The Clallam Bay Corrections Center staff provides professional interpreters or translation services, including sign language, assisting individuals in understanding the PREA information, reporting allegations, and participating in investigations of sexual misconduct. (WADOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section III A-B).

The Auditor also reviewed a random sample of offender files. Each file contained documentation to support an offender's initial intake, the information concerning PREA that was provided during intake, and the offender's participation in the comprehensive PREA education. During the random interviews, all offenders indicated they had received a handbook and information concerning PREA.

The PREA Compliance Manager reports all offenders received within the last 12 months have been educated within 30 days of Intake.

WADOC Policy 310.000 Orientation, Section III A-H, WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section III, A-B, Section XII A-F, copies of the database listing the offenders' orientation date, and copies of DOC 21-992 signed by offenders, and the Auditor's Orientation observation addresses 115.33(a).

The PRA Tracking and Orientation Checklist examples address 115.33 (b).

The PRA Tracking and Orientation Checklist examples address 115.33 (c).

WADOC Policy 310.000 Orientation, Section III A-H, WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section III, A-B, Section XII A-F, and WADOC 450.500 Language Services for LEP Individuals addresses 115.33 (d)

Orientation checklist examples and Clallam Bay Inmate Records address 115.33 (e).

The Auditor's observation of posters in housing units and program/operational areas and the site review checklist address 115.33(f).

	The Clallam Bay Corrections Center complies with Standard 115.33: Resident education.
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115.34 Specialized training: Investigations	
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 2. WADOC Policy 490.860 Prison Rape Elimination Act Investigation 3. WADOC Policy 880.100 Corrections Training and Development 4. 115.34 Administrative Investigations Training 5. 115.34 Instructor guide 6. 115.34 PREA Investigator directory <p>Interviews:</p> <ol style="list-style-type: none"> 1. Investigative Agent <p>The following policies were reviewed: 490.800 Prison Rape Elimination Act Prevention and Reporting, 490.860 Prison Rape Elimination Act Investigation, and 880.100 Corrections Training and Development. The Auditor reviewed the Instructors Guide for Administrative Investigative Training and the Administrative Investigation Training Course. The Auditor notes the Administrative Investigation Training Course is designed to address the requirements outlined in the Prison Rape Elimination Act (PREA) standard 115.34, requiring specialized training for individuals tasked with investigating alleged incidents of sexual abuse in confinement settings. Additionally, this curriculum contains the information fundamental to understanding the concepts required by PREA standard 115.34.</p> <p>An interview was conducted with the Investigative Agent for the Clallam Bay Corrections Center.</p> <p>The Clallam Bay Corrections Center conducts administrative investigations involving sexual abuse and sexual harassment. The Investigator has received training in conducting investigations in confinement settings. The training includes the proper use of Miranda and Garrity warnings, evidence collection, and the criteria and evidence required to substantiate a case for administrative action or criminal referral. The Investigator is aware of his responsibilities during an investigation; he indicated that the investigation would begin immediately upon notification of an allegation. Any allegation that potentially involved criminal behavior would require either the Clallam County Sheriff's Office or the Washington State Patrol's involvement. The training she took covered all areas of the investigative process,</p>

interviewing techniques, evidence collection, evidence protection, and victim advocacy, securing and processing the scene for evidence, securing all evidence, maintaining the integrity of the evidence and seeing to the needs of the victim, providing advocacy support from the Mental Health Staff. The Investigator stated he would review memorandums, collect as much data as possible, and write a report. The training reviewed good interpersonal communication skills with offender victims, assailants, and witnesses, understanding the dynamics of offender sexual violence, and establishing good working relationships with outside agencies, hospitals, prosecutors, and other investigators.

The Investigator noted that Anonymous or third-party reports would be thoroughly investigated immediately. A third party or an anonymous tip would be treated the same as a direct report. The Investigator indicated she would aid the investigating agency by providing information about the victim and perpetrator, such as any pertinent central file information, prior complaints and reports of previous sexual abuse, and he would provide any information on prior investigations involving either the victim or the perpetrator.

WADOC has established specialized investigator training that provides information regarding the conduct of all PREA-related investigations. This includes but is not limited to how to conduct an investigation in confined settings, techniques for interviewing sexual abuse victims, the proper use of Miranda and Garrity Warnings, and evidence collection. PREA investigator training was initiated in 2011 when a formal specialized course was launched. When the final PREA standards were released, it was determined that the course content needed to be updated to ensure compliance with the standards. The updated course was launched in November 2013. In order to ensure all prior participants had been provided with the elements that were included in the training update, a PREA Booster Training course was launched. Existing investigators were provided with new information and additional interviewing and report-writing practice. This booster training was only available for a limited period and was intended only for individuals who had completed investigator training before the November 2013 update. In order to be a qualified PREA investigator after November 2013, a person must have completed the updated course or the previous version of the training and the PREA booster.

Criminal investigations are conducted by law enforcement. Washington Administrative Code (WAC) 139-05-240 outlines the requirements of the basic law enforcement academy, and WAC 139-05-250 outlines the basic law enforcement curriculum. WAC 139-25-110 outlines the career-level certification for law enforcement and corrections personnel. Additionally, on July 23, 2017, the Washington State Legislature amended the Revised Code of Washington (RCW) 43.330.470 and added new sections to 36.28A.430 and, 435 and 43.101. Among other provisions, these changes establish a task force on sexual assault forensic examination best practices, requiring ongoing specialized training for law enforcement officials responsible for investigating sexual assault cases involving adult victims. This training includes sexual assault evidence, victimization and trauma response to improve the quality and outcomes of sexual assault investigations. The law also dictates (1) the offering of the training beginning July 1,

	<p>2018, and requires officers assigned to regularly investigate sexual assault involving adult victims complete the training within one year of being assigned or by July 1, 2020, whichever is later; and (2) incorporation of victim-centered, trauma-informed approaches to policing in the basic law enforcement training curriculum, designed for commissioned patrol officers not regularly assigned to investigate sexual assault cases, to be deployed in annual trainings beginning in 2018.</p> <p>WADOC 490.800 Prison Rape Elimination Act Prevention and Reporting, Section X, H, addresses 115.34(a).</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act Prevention and Reporting, Section X, H, the Investigator's training records, the Instructor Guide, the Administrative Investigations Training Course and the interview with the Investigator addresses 115.34 (b) and (c).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.34: Specialized Training: Investigations.</p>
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115.35	Specialized training: Medical and mental health care
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 880.100 Corrections Training and Development 2. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 3. WADOC 610.025 Health Services Management of Alleged Sexual Assault Misconduct Cases 4. 115.35 PREA For Health Services Training 5. 115.35 Training Transcripts for Medical and Mental Health Staff 6. 115.35 Medical and Mental Health Training spreadsheet <p>Interviews:</p> <ol style="list-style-type: none"> 1. Medical Staff 2. Mental Health Staff <p>The following policies were reviewed: WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting and 610.025 Health Services Management of Alleged Sexual Assault Misconduct Cases. Additionally, the Auditor reviewed the specialized training curriculum for the medical and mental health staff. This curriculum included victim identification, interviewing, reporting, and required clinical interventions. Further review of training records confirmed that all mental health and medical staff received specialized training.</p>

	<p>Interviews were conducted with Mental Health and Medical staff.</p> <p>The Clallam Bay Corrections Center provides PREA training to the medical and mental health practitioners who work in the facility. The training includes detecting signs of sexual abuse/harassment, preventing the destruction of evidence, responding to victims, and reporting allegations or suspicions of sexual abuse and sexual harassment. Facility medical staff do not conduct forensic examinations.</p> <p>Additionally, Medical and Mental health staff receive training on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how and to whom to report allegations of sexual abuse and sexual harassment. The Auditor confirmed that the Medical and Mental Health staff was provided training. Interviews with the Mental Health staff and Medical staff confirmed the practice.</p> <p>Mental Health Staff members have received specialized training in detecting signs of sexual abuse and how to respond effectively to victims of sexual abuse. Forensic medical examinations are completed at Forks Memorial Hospital. The facility's Medical staff have not received training in conducting forensic examinations.</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section, X.B and G and 610.025 Health Services Management of Alleged Sexual Assault Misconduct Cases address 115.35(a).</p> <p>WADOC Policy 610.025 Health Services Management of Alleged Sexual Assault Misconduct Cases, pages 1-7, and the Pre Audit Questionnaire indicating the Clallam Bay Corrections Center medical staff do not conduct Forensic Evaluations (confirmed through interviews with Medical Staff), addresses 115.35(b).</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section, X.B and G and a review of training records confirmed that mental health and medical staff received specialized training and annual refresher PREA Training, addresses 115.35(c).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.35: Specialized Training: Medical and Mental Health Care.</p>
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments

2. WADOC Policy 280.310 Information Technology Security
3. WADOC Policy 280.515 Data Classification and Sharing
4. 115.41 PRA Risk Assessment Form
5. 115.41 Security Groups' Access to PRA Information
6. 115.41 PRA Assessors guide
7. 115.41 PRA Samples
8. 115.41 PRA Follow-up Samples
9. 115.41 PRA For Cause Samples
10. 115.41 PREA Coordinator Explanatory Memorandum
11. 115.41 PRA and Orientation Tracking spreadsheet
12. CBCC Site Review

Interviews:

1. Intake staff
2. Staff who conduct screening for risk of victimization and abusiveness
3. Random offender interviews

The following policies were reviewed: WADOC Policy DOC 490.820 Prison Rape Elimination Act Risk assessments and assignments, 280.310 Information Technology Security, and 280.515 Data Classification and Sharing Sections, The PREA Risk Assessment form, completed Risk Assessment forms and spreadsheets detailing completed PREA Risk Assessments were reviewed.

Interviews were conducted with staff who conducted screening for the risk of victimization and abuse, Intake Staff and Incarcerated Individuals.

The Auditor observed and was provided a step-by-step overview of the intake and Orientation process.

All Incarcerated Individuals are provided PREA Risk Assessments within 72 hours of arrival at the Clallam Bay Corrections Center. The PREA Risk Assessment is conducted privately by a staff member trained in conducting PREA Risk Assessments.

The PREA Risk Assessment is outlined in DOC Policy 490.820 Prison Rape Elimination Act (PREA) Risk Assessments and Assignments. This assessment assists staff in identifying and managing those Incarcerated Individuals with a higher likelihood of becoming victims of sexual assault while incarcerated and those with a higher likelihood of sexually preying on others. Risk Assessments are completed on all offenders specifically to reduce incidents of sexual assault and abuse at the Clallam Bay Corrections Center. Assessment results are considered in housing, bed, work, education and program assignment decisions. The Offender Management Network Information System (OMNI) PREA Risk Assessment is the electronic version of the DOC Form 07- 019 PREA Risk Assessment.

According to WADOC Policy 490.820 Prison Rape Elimination Act (PREA) Risk Assessments and Assignments, information for the PREA Risk Assessment is obtained

from available file information, an interview with the offender, and any other reliable sources. The source(s) of the information is documented. All PREA Risk Assessments must be completed in person with the offender.

The initial PREA Risk Assessment is completed within 72 hours of arrival at the first facility where an offender is received. This includes offenders returning to a facility from anything other than escorted leave (e.g., out-to-court, escape).

If an offender releases, regardless of the type of release, and then returns, a new initial PREA Risk Assessment must be completed, regardless of the reason for or timeframe of the return.

An Intake PREA Risk Assessment must be completed within 72 hours of the transfer of any offender between Washington Department of Corrections facilities.

A Follow-Up PREA Risk Assessment will be completed between 21 and 30 calendar days of the offender's arrival at any facility to incorporate any additional information received suggesting potential for victimization or predation. When meeting with the offender, the counselor has the option to ask the offender if anything has changed from the previous assessment rather than asking the offender all the individual assessment questions. A review of all available information is required (e.g., OMNI, OnBase, Incarcerated Individual file). Only For Cause PREA Risk Assessments can be completed before day 21.

If a For Cause PREA Risk Assessment is completed between days 0 and 21 (after the Initial or Intake PREA Risk Assessment), the Assessor will still need to complete a Follow-up PREA Risk Assessment between days 21 and 30. The For Cause PREA Risk Assessment does not count for or take the place of the Follow-up PREA Risk Assessment.

A For Cause PREA Risk Assessment is completed by the offender's assigned Classification Counselor or Work/Training Release CCO within ten business days when:

- Additional information is received suggesting potential for victimization or predation (e.g., reports of behavior while in jail or on the bus while in transit, court documents, Pre-Sentence Investigations, etc.). The offender self-discloses (e.g., reports prior abuse; sexual orientation/identity).
- There is a finding of guilt on an infraction for sexual assault or violence.
- Staff observes behavior suggesting potential for victimization or predation.
- An allegation of offender-on-offender sexual assault/abuse or staff sexual misconduct is substantiated.

Individuals are not obligated to answer PREA Risk Assessment questions and cannot be disciplined for refusing to answer or not disclosing complete information in response to assessments.

The Auditor reviewed the PREA Risk Assessment Form. The PREA Risk Assessment form evaluates the offender in several areas, including the offender's mental health and physical health, age of the offender, physical build of the offender, previous

incarcerations, criminal history, prior sex offenses, whether the offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex or gender non-conforming, prior sexual victimization and the offender's perception of their vulnerability.

All information gathered during intake is shared with only those staff that need to know. PREA Risk Assessments are completed within a restricted component of the Offender Management Network Information (OMNI) system. Access to this system is restricted to the following:

- Classification Counselors responsible for completing assessments.
- The staff identified by the facility Superintendent responsible for oversight of risk assessment for offenders who do not have an assigned Classification Counselor generally due to a vacancy.
- Identified Information Technology and PREA Unit staff responsible for system maintenance.

The Auditor notes that offenders identified as vulnerable to sexual abuse or harassment or at high risk of being sexually abusive are referred to Mental Health for appropriate follow-up and/or assessment. The Auditor interviewed a staff member who conducts risk assessments. The staff member was aware of his responsibilities in conducting risk assessments. Mental Health staff members indicated they conduct face-to-face interviews and consider all aspects, including suicide, mental health, drug issues, sexual assault victim, gang activity, physical build, verbal and social skills, special needs, and safety.

Random offender interviewees assert when they first came to the Clallam Bay Corrections Center, they were asked questions like whether they had ever been sexually abused, whether they identified as being lesbian/gay/bisexual/transgender (LGBTI), whether they have any disabilities, and whether they think they might be in danger of sexual abuse at the Clallam Bay Corrections Center. Interviewees were asked these questions during the intake PREA Risk Assessment and the follow-up PREA Risk Assessment.

WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section I.B.1, the interview with Staff who conduct screening for risk of victimization and abusiveness, and interviews with random incarcerated individuals address the requirements of 115.41(a).

WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section I.B.1, the interview with Staff who conduct screening for risk of victimization and abusiveness, and interviews with random incarcerated individuals addresses the requirements of 115.41(b).

115.41 PRA Risk Assessment (form), 115.41 PRA Assessors Guide, 115.41 PRA Samples, 115.41 PRA Follow-up Samples and 115.41 For Cause PRA Samples addresses 115.41 (c).

	<p>WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 A-F, the interview with Staff who conduct screening for risk of victimization and abusiveness, 115.41 PRA Samples and the 115.41 PREA Risk Assessment form addresses 115.41 (d).</p> <p>WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 A-F the interview with Staff who conduct screening for risk of victimization and abusiveness, 115.41 PRA Samples and the 115.41 PREA Risk Assessment form addresses 115.41 (e).</p> <p>WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 C, the interview with Staff who conduct screening for risk of victimization and abusiveness, interviews with random incarcerated individuals and 115.41 PRA Follow-up Samples addresses 115.41 (f).</p> <p>WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 D the interview with Staff who conduct screening for risk of victimization and abusiveness, interviews with random incarcerated individuals and 115.41 For Cause PRA Samples addresses 115.41 (g).</p> <p>WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 E. 2., and the interview with Staff who conduct screening for risk of victimization and abusiveness, address 115.41 (h).</p> <p>115.41 PREA Coordinator Explanatory Memorandum and 115.41 Security Groups' Access to PRA Information addresses 115.41 (i).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.41: Screening for risk of victimization and abusiveness.</p>
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.820 - Prison Rape Elimination Act Risk Assessment and Assignments 2. WADOC Policy 490.700 Transgender, Intersex Non-Binary Housing and Supervision 3. WADOC Policy 300.380 Classification and Custody Facility Plan Review 4. 115. 42 Housing of offenders without PRA 02-03-20 5. 115.42 PRA Housing Guide 2019 6. 115.42 Monitoring Plan Samples 7. 115.42 PREA Housing Movement Chrono Samples

8. 115.42 Incoming transport jobs screening ITJS samples
9. 115.42 02-384 housing protocol
10. 115.42 03-385 housing review

Interviews:

1. PREA Coordinator
2. PREA Compliance Manager
3. Staff who conduct risk assessments
4. Intersex Incarcerated Individual
5. Transgender Incarcerated Individual
6. Adrogenis Incarcerated Individual
7. Bisexual Incarcerated Individual
8. Pansexual Incarcerated Individual

The following policies were reviewed: WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments, 490.700 Transgender, Intersex Non-Binary Housing and Supervision and 300.380 Classification and Custody Facility Plan Review. Additionally, the Auditor reviewed Housing placement, work, education, and monitoring plan documents.

Interviews were conducted with the PREA Coordinator, PREA Compliance Manager and staff who conduct risk assessments.

During the on-site visit, the Auditor observed incarcerated individuals meeting with Mental Health staff, Medical Staff, and Case Management.

WADOC Policy 490.820 - Prison Rape Elimination Act Risk Assessment and Assignments addresses the appropriate assignment of those offenders at high risk for sexual victimization or sexual abusiveness. The policy indicates that information gathered through the risk screening shall be utilized to determine housing, bed placements, work assignments, education, and programs to separate offenders who demonstrate a high risk of being sexually victimized from those who show a high risk of sexual abusiveness. Before assigning an offender to a multi-person cell/dorm area, the PREA Risk Assessment is reviewed to ensure they are not assigned to an area that would place them at risk for victimization.

Upon intake, the staff relies on the PREA Risk Assessment information from the originating facility for placement decisions. Once the intake PREA Risk Assessment has been completed at the Clallam Bay Corrections Center (within 72 hours), the Assessment becomes the basis for subsequent custodial decisions, including offender housing, bed placement, work assignments, education, and programming. As indicated by the PREA Compliance Manager and staff who conduct risk assessments, the PREA Risk Assessment determines the offenders' housing placement, cell placement, work assignment, and programming considerations.

The auditor evaluated a sampling of housing assignment reviews, work education assignment reviews and monitoring plans. These documents indicate constant

monitoring of available information to ensure the appropriate placement of each offender. Further formal and informal offender interviews indicated they had been placed in living and programming assignments where they felt safe.

WADOC Policy 490.700 Transgender, Intersex Non-Binary Housing and Supervision indicates that placement of transgender or intersex offenders in a male or female facility is made on a case-by-case basis. In making facility placement decisions, the Agency must ensure the offender's health and safety and whether a placement would present management or security problems. When making subsequent housing or other program assignments for transgender or intersex offenders, the agency policy stipulates individualized consideration, ensuring the offender's health and safety and evaluating the potential for management or security problems.

Each facility within the Agency has a Multidisciplinary Review Committee. The committee ensures all individuals under Department supervision have equal access to programs and services. The committee will convene within ten days if an individual discloses transgender, intersex, or non-binary identity during incarceration. The committee will review housing and programming assignments and make recommendations. The PREA Compliance Manager chairs the Multidisciplinary Review Committee and will include, but not be limited to, the Captain, the Correctional Program Manager, a medical practitioner/provider, a mental health practitioner/provider, and the assigned case manager. Initial housing reviews are completed, approved, and submitted within ten business days of disclosure of the individual as transgender, intersex, or non-binary. The PREA Coordinator reviews housing protocol recommendations and forwards all related documentation to the Gender Responsive Administrator for final review and approval.

Housing and programming assignments for all transgender and intersex offenders are made on a case-by-case basis, including individual shower arrangements, feelings of safety and prioritizing the incarcerated individual's health and safety. The housing review process also considers management or security problems resulting from placement options. Housing reviews are documented in the Protocol for the Housing of Transgender and Intersex Offenders (DOC form 02-384, DOC form 02-385) by the Clallam Bay Corrections Center Multidisciplinary Review Committee. A formal review is conducted at least every six months for each offender identifying as transgender, intersex or non-binary.

WADOC Policy 490.820 - Prison Rape Elimination Act Risk Assessment and Assignments, section V. and VI. A-E, Policy 300.380 Classification and Custody Facility Plan Review, section II. A-D, 115.42 Incoming transport jobs screening ITJS samples and interviews with the PREA Compliance Manager and staff responsible for Risk Screening addresses 115.42 (a).

WADOC Policy 490.820 - Prison Rape Elimination Act Risk Assessment and Assignments, section V. and VI. A-E, Policy 300.380 Classification and Custody Facility Plan Review, section II. A-D, 115.42 Incoming transport jobs screening ITJS samples and the interview with staff who conduct Risk Screening addresses 115.42 (b).

WADOC Policy 490.700 Transgender, Intersex Non-Binary Housing and Supervision,

	<p>sections II-VI, 115.42 02-384 housing protocol, 115.42 02-385 housing review, and the interview with the PREA Compliance Manager addresses 115.42 (c).</p> <p>WADOC Policy 490.700 Transgender, Intersex Non-Binary Housing and Supervision, section V. C., 115.42 02-384 housing protocol, 115.42 02-385 housing review, and interviews with PREA Compliance Manager and staff responsible for Risk Screening addresses 115.42 (d).</p> <p>WADOC Policy 490.700 Transgender, Intersex Non-Binary Housing and Supervision, sections II-VI, and the interviews with the PREA Compliance Manager and staff responsible for Risk Screening addresses 115.42 (e).</p> <p>WADOC Policy 490.700 Transgender, Intersex Non-Binary Housing and Supervision, sections II-VI, and the interviews with the PREA Compliance Manager and staff responsible for Risk Screening addresses 115.42 (f).</p> <p>WADOC Policy 490.820 - Prison Rape Elimination Act Risk Assessment and Assignments, section VI. E., and interviews with the PREA Coordinator and PREA Compliance Manager address 115.42 (g)</p> <p>The Clallam Bay Corrections Center complies with Standard Standard 115.42: Use of screening information.</p>
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115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments 2. WADOC Policy 320.255 Restrictive Housing 3. WADOC Policy 320.200 Administrative Segregation 4. 115.43 Current Potential Victims with Housing Assignments <p>Interviews:</p> <ol style="list-style-type: none"> 1. Superintendent 2. PREA Compliance Manager 3. Staff who supervise offenders in segregated housing <p>The following policies were reviewed: WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments, Policy 320.255 Restrictive Housing and Policy 320.200 Administrative Segregation.</p>

Policy 490.820 states that the placement of offenders at potential risk of sexual victimization should not be housed in the same cell/room as an offender who scores at potential risk for sexual predation. Policy 490.820 mandates that the offender at risk of potential victimization not be placed in protective custody housing unless a thorough evaluation of alternatives has been conducted and a determination made that there is no viable alternative to the separation of the victim from the abuser.

Policy 490.820 also requires that any placement be immediately evaluated with an assessment completed within twenty-four (24) hours.

Policy 490.820 requires that if the involuntary segregation placement is made, the facility shall permit the offender access to programs, privileges, education, and work assignments to the extent possible. Furthermore, the facility must document the limited opportunities, duration, and reason if any programming is restricted. Any placement extending past thirty (30) days necessitates documentation that justifies the extension. If the placement lasted more than thirty (30) days, a review would be conducted to determine the continued need for the involuntary segregation placement.

Regarding facilities with dormitory/open housing, Policy 490.820 mandates each facility will establish procedures for appropriate bed assignment for at-risk offenders. The Clallam Bay Corrections Center is a minimum stand-alone facility and ensures that incarcerated individuals screened to be at risk for sexual victimization are placed in an environment safe from individuals who have been screened to be at risk for sexually predatory behaviors. Furthermore, incarcerated individuals in secured housing cannot be retained for more than 14 days; in limited circumstances, a 7-day extension may be approved to accommodate transportation needs. In her interview, the Superintendent indicated placement in involuntary segregation for offenders at risk of sexual victimization at the Clallam Bay Corrections Center would only occur if no suitable alternative housing exists and would last until arrangements could be made for transportation of the individual to a different facility. The Superintendent further stated that housing offenders at risk for sexual victimization is managed with consideration for their safety. She expressed that the movement of the individual at risk for sexual victimization to involuntary segregation would be utilized as the last alternative.

The Clallam Bay Corrections Center reported that no offenders were involuntarily placed in secured/restricted housing based on their risk for sexual victimization during the review period.

WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments section, VI. D., Policy 320.255 Restrictive Housing section II and the interview with the Superintendent, address 115.43 (a).

WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments section, VI. D., and the interview with Staff Supervising Incarcerated Individuals in Segregated Housing address 115.43 (b).

WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and

	<p>Assignments section, VI. D., and interviews with the Superintendent and Staff Supervising Incarcerated Individuals in Segregated Housing address 115.43 (c).</p> <p>WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments section, VI. D., and Policy 320.200 Administrative Segregation, sections I and II, address 115.43 (d).</p> <p>WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments section, VI. D., and the interview with Staff Supervising Incarcerated Individuals in Segregated Housing address 115.43 (e).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.43 – Protective custody.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 2. WADOC Policy 490.850 Prison Rape Elimination Act Response 3. WADOC Policy 450.100 Mail for Individuals in Prison 4. 115.51 Colorado MOU 5. 115.51 policy glossary excerpt 6. 115.51 PREA 101 Online Training Pages 60-67 7. 115.51 PREA orientation script English and Spanish 8. 115.51 PREA Prison Poster Spanish 9. 115.51 PREA Prison Posters English 10. 115.51 English Brochure 11. 115.51 Spanish Brochure 12. 115.51 Statewide Orientation Handbook 13. 115.51 Brochure Staff Contractors and Volunteers 14. 115.51 WAC 137-48-020 15. 2023 CDOC PREA LOG 16. CBCC Site Review <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 1. Random staff 2. Random Incarcerated Individuals 3. PREA Compliance Manager <p>The following policies were reviewed: WADOC Policy 490.800 Prison Rape Elimination</p>

Act Prevention and Reporting, Policy 490.850 Prison Rape Elimination Act Response and WADOC Policy 450.100 Mail for Individuals in Prison. The Auditor reviewed the Statewide Orientation Handbook, posters and brochures, and spreadsheets detailing PREA-related issues submitted by Washington State Incarcerated Individuals to the Colorado Department of Corrections. Finally, the Auditor reviewed the Washington State Department of Corrections website, which includes information on reporting an act of sexual harassment or sexual abuse. (<https://doc.wa.gov/corrections/prea/default.htm>)

Interviews were conducted with both random staff and offenders.

The following observations were made during the onsite tour of the facility: The housing units, program areas, and intake area had signs informing offenders of their right to be free of sexual abuse. There were signs informing offenders about how to report incidents of sexual abuse. The signs were posted in both English and Spanish.

Incarcerated Individuals have multiple ways to report allegations of sexual abuse and sexual harassment at the Clallam Bay Corrections Center; specifically, Incarcerated Individuals are encouraged to report pressure, threats, or instances of sexual abuse or sexual harassment immediately, as well as possible retaliation by other offenders or employees for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Incarcerated Individuals who are victims of sexual abuse have the option to report an incident to a designated employee other than an immediate point-of-contact line officer by using any of the following methods:

- Call the PREA Hotline at 0-800-586-9431
- Submit a kite, kiosk message or grievance (PREA reports received via grievance will be removed from the grievance process and addressed as a PREA allegation.)
- Send legal mail to the State Attorney General, law enforcement or the PREA Coordinator at Headquarters.
- Submit a Report of Prison Rape Elimination Act Allegation form. An Incarcerated individual can also report anonymously.
- Family or friends can report for an Incarcerated Individual by calling the PREA Hotline, writing a letter to the PREA Coordinator or emailing DOCPREA@doc.wa.gov.

The website (<https://www.doc.wa.gov/corrections/prea/default.htm>) provides the following information concerning reporting: Reporting Allegations of Sexual Abuse/ Sexual Harassment.

- If you have information regarding a DOC offender who has been the victim of sexual misconduct while under DOC custody or community supervision, please report it in one of the following ways:
- Call Toll-Free: (800) 586-9431 TTY: (844) 242-1201. Calls are recorded, and

- messages are checked Monday – Friday between 8:00 a.m. – 5:00 p.m.
- Email: (DOCPREA@doc1.wa.gov) Email to report sexual misconduct or request additional information.
 - Mail PREA PO BOX 41131 Olympia, WA 98504-1131 Mail to report sexual misconduct or request additional information.

These multiple reporting methods are posted throughout the facility, they are available in the PREA information provided to offenders, and they are reviewed with the offender during intake. Incarcerated Individual interviews confirm knowledge of the reporting procedures.

Staff reporting requirements are addressed in WADOC Policy 490.850 Prison Rape Elimination Act Response Section, I.A. and E. and Attachment 2. This information is addressed in PREA training and included in a PREA brochure for staff, contractors and volunteers. WADOC Policy 490.850 allows staff to report allegations of a highly sensitive nature (e.g., allegations against the Shift Commander or Community Corrections Supervisor or in which that person may have a conflict of interest) directly to the Superintendent or Duty Officer. The brochure for staff (Prison Rape Elimination A Resource for Staff, Volunteers and Contractors) also provides reporting information, including access to staff psychologists. Staff interviews confirm knowledge of reporting procedures.

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section XIII. A-D., WADOC Policy 490.850 Prison Rape Elimination Act Response, Section, I.A.-F., WADOC Policy 450.100 Mail for Individuals in Prison, Section, II.A - H., Interviews with Random staff and Incarcerated Individuals and the CBCC Site Review address 115.51 (a).

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section XIII. B. 3. e., 2023 CDOC PREA LOG, CBCC Site Review, Statewide Prison Handbook, page 16, Interviews with the PREA Compliance Manager and Incarcerated Individuals, 115.51 Colorado MOU, 115.51 English Brochure and 115.51 Spanish Brochure address 115.51 (b).

WADOC Policy 490.850 Prison Rape Elimination Act Response, Section 1. A. and E and Attachment 2, 115.51 Brochure Staff Contractors and Volunteers and Interviews with Random Staff and Incarcerated Individuals address 115.51(c).

WADOC Policy 490.850 Prison Rape Elimination Act Response, Section 1. A. and E and Attachment 2, 115.51 PREA 101 Online Training Pages 60-67, 115.51 Brochure Staff, Contractors, Volunteers and Interviews with Random Staff address 115.51 (d).

The Clallam Bay Corrections Center complies with Standard 115.51: Incarcerated Individual Reporting.

115.52	Exhaustion of administrative remedies
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Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents

1. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting
2. WADOC Policy 550.100 Resolution Program
3. 115.52 Resolution Program Manual English
4. 115.52 Resolution Program Manual Spanish

The Agency does not have procedures in place to address grievances of sexual misconduct. If an incarcerated individual submits a PREA allegation using the resolution request system, they are notified that the resolution is being submitted for a PREA investigation. This notification is generally provided within one business day of receipt of the resolution request. On the day the resolution request is processed, the allegation is submitted to the Shift Commander/Work Release Administrator or Duty Officer, and a report is made through the Incident Management Report System (IMRS). The PREA Triage Unit then reviews the allegation and opens a case, appends the allegation to an existing case, or determines the allegation does not meet the criteria of a PREA allegation.

If the issue falls within the scope of a PREA incident, a formal investigation is initiated and forwarded to the appropriate Appointing Authority for oversight and findings. All investigation-finding decisions remain with the Appointing Authority. All investigations resulting from grievances are subject to the same level of review, notification and follow-up as PREA investigations initiated from other sources of information.

The Washington State Department of Corrections provides for PREA allegations received through the grievance process to be handled with the same level of importance and scrutiny as allegations of sexual abuse received in any other manner. Additionally, there are no time limits within which an offender may submit a PREA-related allegation through the grievance process.

Although PREA investigations are not subjected to specific policy-defined timelines for completion, WADOC policy 490.860, Prison Rape Elimination Act (PREA) Investigation, states: "The Department will thoroughly, promptly, and objectively investigate all allegations of sexual misconduct involving offenders under the jurisdiction or authority of the Department." If an investigation has been open for 90 days or more, it is reviewed by the agency PREA Coordinator and the responsible Appointing Authority. This allows for oversight of investigations without restricting the investigation, particularly in cases involving law enforcement or issues such as witness availability, evidence processing, etc.

Generally, offenders must exhaust their administrative remedies (i.e., the grievance resolution process) before filing litigation. Since the Washington State Department of Corrections removes PREA allegations from the established grievance resolution process, submitting a formal grievance is not a prerequisite for an incarcerated

	<p>individual to file related litigation.</p> <p>The Washington State Department of Corrections is exempt from this standard.</p>
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115.53	Inmate access to outside confidential support services
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 2. 115.53 Advocate confidentiality summary 3. 115.53 In-person advocacy guide 4. 115.53 K11494 OCVA expires 06-30-2025 5. 115.53 Contract No. K11494 Amendment No. 4 6. 115.53 PREA Coordinator Explanatory Memo 7. 115.53 OCVA Brochures English and Spanish 8. 115.53 OCVA-JDI Support Poster English 9. 115.53 OCVA-JDI Support Poster Spanish 10. 115.53 PREA Advocacy Memo 11. 115.53 Orientation Script English and Spanish 12. 115.53 Statewide Orientation Handbook 13. Law Enforcement Meeting 2023-01-25 14. CBCC Site Review <p>Interviews</p> <ol style="list-style-type: none"> 1. Mental Health Staff 2. Victim Advocate Mariposa House 3. Random Incarcerated Individuals <p>The following policy was reviewed to determine compliance: WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting. Additionally, the Auditor reviewed the Statewide Handbook, various brochures, and posters presenting information about Advocacy services and the MOU between the Washington State Department of Corrections and the Office of Crime Victim Advocacy.</p> <p>Interviews were conducted with random offenders, mental health staff, and a Victim Advocate from Mariposa House.</p> <p>The following observations were made during the on-site tour of the facility: The housing units and programming areas all had signs/posters informing Incarcerated Individuals of their right to be free of sexual abuse. There were signs informing offenders about how to report incidents of sexual abuse. The signs were posted in</p>

both English and Spanish. The Auditor also reviewed the information provided to offenders concerning the Office of Crime Victim Advocacy, Just Detention International and Mariposa House.

The Auditor reviewed the Memorandum of Understanding between the Office of Crime Victim Advocacy and the Washington State Department of Corrections. Services begin with a telephone call to the Office of Crime Victim Advocacy Sexual Assault Support and Information Line. Calls are taken live during business hours; an Incarcerated Individual will reach a recording during non-business hours. The first step is to screen the call for its appropriateness as a PREA-related call. The Office of Crime Victim Advocacy Direct Services Specialist will provide crisis intervention assessment of need(s), support for the caller's experience, provide information on available responses and services, and provide short-term advocacy. The Office of Crime Victim Advocacy Direct Services Specialist will transfer the caller to a geographically appropriate Community Sexual Assault Program (CSAP) if the caller chooses to have additional ongoing services. For the Clallam Bay Corrections Center, the Community Sexual Assault Program is Mariposa House.

Mariposa House is the only approved domestic violence service provider for Clallam County, designated by the Washington State Department of Social and Health Services, and the only 24-hour Community Sexual Assault Program for Clallam County, accredited by Washington State. Mariposa House provides services and programs for survivors in Clallam County. The four core 24/7 crisis support services are

- a confidential emergency shelter for survivors of domestic violence and assistance with basic needs;
- a telephone helpline to connect individuals with resources to meet crisis needs;
- a sexual assault in-person response - hospital accompaniment from staff with support during a sexual assault exam and
- a prison sexual assault response.

The Office of Crime Victim Advocacy is committed to supporting the Washington State Department of Correction's capacity to prevent incidents and provide sexual assault services.

Before giving them access, the Clallam Bay Corrections Center informs Incarcerated Individuals 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. Incarcerated Individuals are informed about the confidential services provided by Mariposa House. In Washington State, advocates' communications with survivors and any client records maintained by Community Sexual Assault Programs (CSAPs) are protected by the following:

- RCW 5.60.070(7) communications with survivors and any record of those communications are privileged. This protection is similar in scope to attorney-

client privilege.

- RCW 70.125.065 CSAP records are protected from discovery.
- Violence Against Women Act (VAWA) requires survivor information to be kept confidential, which includes any identifying information.

As part of their orientation process, offenders are informed that all telephone calls (except properly placed legal calls) are subject to monitoring and recording and that all mail, except for legal mail, is subject to monitoring.

The Auditor interviewed the Program Director from Mariposa House. During the interview, the Director stated the organization was available to assist victims at the facility. The Director stated that the Mariposa House Victim Advocates had received Sexual Assault Advocacy Training. The training included How to detect and assess signs of sexual abuse and sexual harassment, How to respond effectively and professionally to victims of sexual abuse and sexual harassment, and How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. The Director indicated that at the initiation of services to an offender, the Mariposa House staff member would disclose the limitations of confidentiality and their duty to report. Further, victims of sexual abuse would receive timely and unimpeded access to emergency medical treatment and crisis intervention services, and the nature and scope of the services would be determined according to the professional judgment of the SANE and Advocacy staff. Finally, follow-up services would be provided as necessary, and the level of care was consistent with community standards.

- ***115.53 (a) Does the facility provide Incarcerated Individuals access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers of local State or national victim advocacy or rape crisis organizations, including toll-free numbers where available.***

The Washington State Department of Corrections and the Clallam Bay Corrections facility meet this standard's intent. However, the Auditor attempted to contact the Office of Crime Victim Advocacy support and information line several times. During these attempts, the Auditor was informed via a recorded message that the Direct Services Specialist was unavailable and the call should be attempted again later. The Auditor made ten such phone calls over three days; each time, a recorded message informed the Auditor the Direct Services Specialist was unavailable and the call should be attempted again later. The Auditor then emailed the Office of Crime Victim Advocacy through their website, indicating the inability to reach a Direct Services Specialist. The Auditor was contacted within 24 hours by the Direct Services Specialist, who indicated that she could not monitor the phone due to other work-related responsibilities. The Direct Services Specialist stated she was working on alternatives, including outsourcing the phone monitoring, but no specific plans had been established to accomplish this task.

As a result of the Office of Crime Victim Advocacy's inability to monitor the phone, the Clallam Bay Corrections Center cannot provide Incarcerated Individuals access to

outside confidential support services.

Corrective action plan:

Update the contract with the Department of Commerce and the Office of Crime Victim Advocacy to ensure a position is secured so that the hotline is answered during the identified hours and referrals to local support services are coordinated as needed.

The Office of Crime Victims Advocacy will subcontract to a Community Sexual Assault Program with experience working with incarcerated individuals. Provide sexual assault advocacy services to incarcerated individuals through the Sexual Assault Support and Information Line during Office of Crime Victim Advocacy business hours.

Provide training for new advocates and technical assistance to support current PREA-trained advocates as needed.

The Washington Department of Corrections will provide an updated contract to the Auditor. The Auditor will contact the Office of Crime Victim Advocacy via the hotline to ensure the process has been established. The corrective action due date is March 19, 2024.

March 12, 2024, Corrective Action Plan:

The Department of Commerce and the Washington State Department of Corrections signed an updated contract on October 23, 2023 (Contract No. K11494 Amendment No. 4). Beginning in November 2023, the Office of Crime Victim Advocacy solicited Community Sexual Assault Programs in the State of Washington to select a program that could answer the Office of Crime Victim Advocacy phone. The Office of Crime Victim Advocacy selected Rebuilding Hope, the Sexual Assault Center of Pierce County. The Office of Crime Victim Advocacy trained the staff at Rebuilding Hope. On February 15, 2024, the sexual assault support and information phone began operation. This service component entails a response to initial calls to the sexual assault support and information line. Calls are taken live during business hours. The first step is to screen the call for its appropriateness as a PREA-related call.

Rebuilding Hope staff will then provide crisis intervention, assessment of need(s), support for the caller's experience, information on responses and services available, and short-term advocacy. If the caller chooses to have additional ongoing services, the Rebuilding Hope staff member will transfer the call to a geographically designated Community Sexual Assault Program PREA advocate. The designated PREA advocates will also be available for in-person advocacy at Department of Corrections facilities as needed and appropriate.

The Auditor began testing this service on February 15, 2024. As of March 12, 2024, the phone has been answered consistently by a PREA Advocate from Rebuilding Hope. Each time the Auditor spoke to a PREA Advocate from Rebuilding Hope, he was provided with correct information concerning geographically designated Community Sexual Assault Program PREA Advocates. For example, the geographically designated Community Sexual Assault Program PREA Advocates for the Callum Bay Corrections Center and the Olympic Corrections Center is the Forks Sexual Assault Center (Mariposa House). The geographically designated Community Sexual Assault Program PREA Advocates for the Washington Corrections Center is SafePlace, and the

geographically designated Community Sexual Assault Program PREA Advocates for Airway Heights Corrections Center is Lutheran Community Services. In addition, the PREA Compliance Managers at each facility tested the phone connectivity.

The Corrective Action Plan for 115.53 (a) has been completed, and the Washington Department of Corrections complies with 115.53 (a)

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section XI, A -G, the Statewide Orientation Handbook page 18, the various information posters and brochures, CBCC Site Review, Interviews with Random Incarcerated Individuals and 115.53 K11494 OCVA (Memorandum of Understanding between the Office of Crime Victim Advocacy and the Washington State Department of Corrections Amendment No. 4), address the requirements of 115.53 (a).

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section XI, F., 115.53 Advocate confidentiality summary, 115.53 In-person advocacy guide, 115.53 K11494 OCVA (Memorandum of Understanding between the Office of Crime Victim Advocacy and the Washington State Department of Corrections), 115.53 PREA Coordinator Explanatory Memo and, the Statewide Orientation Handbook page 18, addresses 115.53 (b).

115.53 K11494 OCVA Amendment 4(Memorandum of Understanding between the Office of Crime Victim Advocacy and the Washington State Department of Corrections), the Interviews with Mental Health Staff and the Victim Advocate Mariposa House addresses 115.53 (c).

The Clallam Bay Corrections Center complies with Standard 115.53: Incarcerated Individual Access to outside confidential support services.

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 -Prison Rape Elimination Act Prevention and Reporting 2. 115.54 PREA-Family and Friends Brochure English 3. 115.54 PREA-family-friends-brochure-Spanish 4. 115.54 PREA-family-friends-Poster English 5. 115.54 PREA-family-friends-Poster Spanish 6. CBCC Site Review <p>Interviews:</p>

1. Random Incarcerated Individuals

The following policy was reviewed: WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting. The Auditor reviewed the Washington State Department of Corrections Website, which provides information to the public on how to report sexual abuse or sexual harassment on behalf of an offender. Finally, the Auditor reviewed the PREA Friends and Family brochure.

The Auditor observed signs in both English and Spanish informing offenders about reporting an incident of sexual assault or sexual harassment.

Interviews were conducted with random Incarcerated Individuals who confirmed their knowledge of third-party reporting capabilities.

The Washington State Department of Corrections has established a method to receive third-party reports of sexual abuse. This information is available on the Washington State Department of Corrections website (<https://www.doc.wa.gov/corrections/prea/default.htm>). Information is available to the public on how to report sexual abuse or sexual harassment on behalf of Incarcerated Individuals.

The Clallam Bay Corrections Center provides a pamphlet for Incarcerated Individuals and family and friends. These pamphlets include specific information about PREA, contact information, and reporting information. The Auditor examined the pamphlets and website. The Auditor tested the third-party reporting mechanism by emailing the address on the Washington State Department of Corrections website (docPREA@doc.wa.gov). The email was responded to in less than 24 hours. All appropriate procedures were followed. The Auditor also tested the third-party phone number (left a recorded message) the message was responded to in less than 24 hours. All appropriate procedures were followed. The Auditor reviewed two investigations in which the Incarcerated Individual utilized the external reporting method. All appropriate procedures were followed.

WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, section II.A.10; II.B.6., 7b., and section XIII. A-D, the Washington State Department of Corrections website (<https://www.doc.wa.gov/corrections/prea/default.htm>), 115.54 PREA-Family and Friends Brochure English, 115.54 PREA-family-friends-brochure-Spanish, 115.54 PREA-family-friends-Poster English, 115.54 PREA-family-friends-Poster Spanish and the CBCC Site Review address 115.54 (a).

The Clallam Bay Corrections Center complies with Standard 115.54: Third-party reporting.

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Documents:

1. WADOC Policy 490.850 Prison Rape Elimination Act Response
2. WADOC Policy 350.550 Reporting Abuse and Neglect Mandatory Reporting
3. 115.61 APS (Adult Protective Services) Interagency agreement
4. 115.61 PREA Coordinator Explanatory Memorandum
5. 115.61 RCW 74.34.020

Interviews:

1. PREA Compliance Manager
2. PREA Coordinator
3. Superintendent
4. Random Staff

The following policy was reviewed: WADOC Policy 490.850 Prison Rape Elimination Act Response, and Policy 350.550 Reporting Abuse and Neglect Mandatory Reporting. The Auditor also reviewed the Statewide Incarcerated Individual Handbook pages 11 - 12, 115.61 APS Interagency Agreement and 115.61 PREA Coordinator Explanatory Memorandum.

The Auditor interviewed random staff, the PREA Coordinator, the PREA Compliance Manager, and the Superintendent.

WADOC Policy 490.850 Prison Rape Elimination Act Response requires all staff, including employees, contractors, and volunteers, to immediately report incidents and allegations as identified in the standard. Reporting requirements also apply to all medical and mental health practitioners. Incarcerated Individuals are informed of these requirements in offender handbooks. All staff members must also report any retaliation against Incarcerated Individuals or staff who have reported an incident of sexual assault or sexual harassment. Regardless of its source, Clallam Bay Corrections Center employees who receive information concerning sexual misconduct, who observe an incident of sexual misconduct or have reasonable cause to suspect an offender is a victim of sexual misconduct, must immediately report the information or incident directly to their Supervisor.

Any Clallam Bay Corrections Center employee who fails to report an allegation or coerces or threatens another person to submit inaccurate, incomplete, or untruthful information intending to alter a report may face disciplinary action, including termination of employment. Staff members are required to report any violation of responsibilities that may have contributed to an incident or retaliation. All Clallam Bay Corrections Center staff have a duty to report any allegation of sexual abuse as required by mandatory reporting laws. Incarcerated Individuals are informed of the limitations of confidentiality between offenders and staff.

Aside from reporting to the designated supervisors or officials and designated State or local service agencies, the Clallam Bay Corrections Center 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 additional security and management decisions.

The Revised Code of Washington (RCW) 74.34.020 defines who is considered a vulnerable adult in Washington State. When an allegation is received, the Shift Commander completes a PREA Response and Containment Checklist, which includes a section on notification to Adult Protective Services if the alleged victim is classified as a vulnerable adult. If the allegation is determined to fall within established PREA definitions, a formal investigation is initiated.

Regarding the juvenile portion of this standard, all such allegations are reported to Child Protective Services (CPS) and the applicable facility administrator. When an Incarcerated Individual is the alleged victim of sexual abuse or assault while a juvenile in the community, the staff member receiving the information will offer the Incarcerated Individual the opportunity to meet with mental health per standard 115.81 (a). If the offender consents to meet with mental health professionals, they will be assessed to determine their mental health needs as well as the need to report this information to CPS under the mandatory reporting requirements associated with their licensure requirements.

Although no complaints have been received from a member of the public, a procedure has been established for third-party reporting (see 115.54).

The Clallam Bay Corrections Center requires immediate action to protect offenders from sexual abuse. Staff interviewed are aware of their reporting requirements and the steps that need to be taken to ensure the Incarcerated Individual's safety. All random staff interviewees assert they received training regarding reporting sexual abuse/harassment.

WADOC Policy 490.850 Prison Rape Elimination Act, section I.A. and interviews with Random Staff address 115.61 (a).

WADOC Policy 490.850 Prison Rape Elimination Act, Policy II, section I.F and Attachment 2, the Statewide Incarcerated Individual Handbook pages 11 - 12, and interviews with Random Staff address 115.61 (b).

WADOC Policy 490.850 Prison Rape Elimination, section 1. B-D and interviews with Medical and Mental Health Staff address 115.61 (c).

WADOC Policy 350.550 (all), Revised Code of Washington (RCW) 74.34.020, the Interagency Agreement with the Washington State Department of Social and Health Services Adult Protective Service and interviews with the Superintendent and the PREA Coordinator addresses 115.61 (d).

WADOC Policy 490.850 Prison Rape Elimination Act, section I.A. and interviews with Random Staff and the Superintendent address 115.61 (e).

The Clallam Bay Corrections Center complies with Standard 115.61: Staff and agency reporting duties.

115.62 Agency protection duties

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

1. WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments
2. WADOC Policy 490.850 Prison Rape Elimination Act Response
3. 115.62 Monitoring Plans
4. 115.62 PREA Risk Assessment CBCC

Interviews:

1. Superintendent
2. PREA Compliance Manager
3. Random staff

The following policies were reviewed: WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments and Policy 490.850 Prison Rape Elimination Act Response.

The Auditor interviewed random staff, the PREA Compliance Manager and the Superintendent.

The Auditor reviewed a sampling of monitoring plans and housing assignment reviews from the offenders' electronic records.

A review of policy and interviews with the Superintendent, the PREA Compliance Manager and Random Staff demonstrated the appropriate protective measures to be taken if an incarcerated individual was at imminent risk of sexual abuse. Additionally, all staff interviewed indicated specific knowledge of the protective measures that should be taken in the event an incarcerated individual was subject to a substantial risk of imminent sexual abuse.

As noted in Policy 490.820, section III B, Immediate actions will be taken to protect the incarcerated individual when it has been determined the incarcerated individual is at substantial risk of immediate sexual assault or abuse. A monitoring plan is developed when an incarcerated individual is assessed as a potential victim according to a PREA Risk Assessment. The plan is individualized based on the incarcerated individual's identified needs and risks. Risk identifiers are reviewed when a housing assignment is made to ensure cellmate(s) compatibility. Monitoring plans and housing reviews were documented in the electronic record. The Auditor evaluated a sampling of monitoring plans and housing assignment reviews from incarcerated individuals' electronic records.

When an allegation of sexual misconduct is received, the Shift Commander, Duty

Officer, or Appointing Authority reviews all available information regarding the alleged victim's needs, timeframes, severity, housing and job assignments of the named individuals and any other factors to determine if immediate actions are needed to prevent harm. In protecting incarcerated individuals from potential immediate sexual misconduct harm, the response may include housing reassignments, housing unit changes, or facility transfers of the alleged abuser or alleged victim. Decisions are documented in a response checklist and within the Incident Management Report System.

Based upon an interview with the Superintendent, when the facility learned that an incarcerated individual was at imminent risk of sexual abuse, immediate action would be taken to protect the victim. During the Superintendent's interview, he indicated that during such instances, the alleged perpetrator would be moved to a different housing unit, placed in segregation or transferred to another facility. The victim would remain in the general population unless doing so would involve a risk of imminent sexual abuse. Further, it was clear that staff members involved in PREA allegations would be removed from their posts and placed on Administrative Leave, prohibiting them from access to the potential victim in situations indicative of risk resulting from sexual abuse allegations.

All safeguarding options would be considered if the alleged perpetrator was an incarcerated individual and a staff member was the subject of abuse or harassment. If appropriate, options include reassigning the incarcerated individual to another housing unit, writing incident reports, and criminal prosecution.

The staff interviewed are aware of their reporting requirements and the steps that need to be taken to ensure the incarcerated individual's safety.

The PREA Compliance Manager asserts that when an offender is exposed to a substantial risk of imminent sexual abuse, the potential victim is immediately removed from the danger zone and placed in a safe environment.

Random staff interviewees assert if they learn an offender is at risk of imminent sexual abuse, they immediately remove the offender from the danger zone and place the potential victim under direct staff supervision to ensure safety.

WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments section III and WADOC Policy 490.850 Prison Rape Elimination Act Response section V. A., B., D. and the monitoring plans and housing assignment reviews from the incarcerated individuals' electronic records address 115.62 (a).

The Clallam Bay Corrections Center complies with Standard 115.62: Agency protection duties.

115.63	Reporting to other confinement facilities
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	Auditor Overall Determination: Meets Standard
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Auditor Discussion

Documents:

1. WADOC Policy 490.850 Prison Rape Elimination Act Response
2. WADOC Policy 490.860 Prison Rape Elimination Investigation
3. 115.63 Documented Reports from CBCC to other facilities spreadsheet (4 notifications)
4. 115.63 Documented reports to other facility's email notifications (6 notifications)

Interviews conducted with:

1. PREA Compliance Manager
2. Superintendent

The following policies were reviewed: WADOC Policy 490.850 Prison Rape Elimination Act Response and Policy 490.860 Prison Rape Elimination Investigation.

Interviews were conducted with the PREA Compliance Manager and the Superintendent.

The PREA Compliance Manager stated during the past 12 months, there has been four documented situation in which another institution was notified concerning an offender's allegation of sexual abuse. The PREA Compliance Manager stated the notification occurred within 72 hours of the time frame. The Auditor reviewed the documentation and found it compliant with the 72-hour time frame.

WADOC Policy 490.850 Prison Rape Elimination Act Response, section III.D addresses 115.63 (a).

WADOC Policy 490.850 Prison Rape Elimination Act Response, section III.D and 115.63 Documented Reports from CBCC to other facilities spreadsheet (4 notifications) address 115.63 (b).

WADOC Policy 490.850 Prison Rape Elimination Act Response, section III.D 115.63 Documented Reports from CBCC to other facilities spreadsheet (4 notifications) and 115.63 Documented reports to other facility's email notifications (6 notifications) address 115.63 (c).

WADOC Policy 490.850 Prison Rape Elimination Act Response, section III.D, WADOC Policy 490.860 Prison Rape Elimination Investigation (all) and 115.63 Documented reports to other facility's email notifications (6 notifications) address 115.63 (d).

The Clallam Bay Corrections Center complies with Standard 115.63: Reporting to other confinement facilities.

115.64 Staff first responder duties

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

- 1. WADOC Policy 490.850 Prison Rape Elimination Act Response
- 2. 1st Responder Duties

Interviews:

- 1. Random Staff
- 2. Non-security staff who acted as first responder

The following policy was reviewed WADOC Policy 490.850 Prison Rape Elimination Act Response.

During the Onsite tour, informal discussions were conducted by the Auditor with the Clallam Bay Corrections Center custody staff concerning how they would respond to different situations involving allegations of sexual assault or sexual harassment. In these informal discussions, staff indicated the most crucial step was to keep the victim safe, believe what the victim had stated, and take action as necessary to ensure the victim's safety.

The Random staff interviewed indicated they had received training that included the duties of a first responder.

Any employee who discovers or learns of sexual abuse or an allegation of sexual abuse shall ensure that the following actions are accomplished: The alleged victim is kept safe, prevent any contact with the alleged perpetrator, preserve the crime scene, and contact the Shift Commander. Ensure the alleged victim does not take any actions that could destroy physical evidence.

Interviews with random staff indicate they understand the duties of a first responder. Additionally, the policy clearly describes the steps to be taken in response to an allegation of sexual abuse, assault, or harassment. Those steps include separating the parties, cell reassignment, securing the scene, following evidentiary practices, and medical evaluation.

WADOC Policy 490.850 Prison Rape Elimination Act Response, section III., A., B., a review of the PREA Investigation Process (Attachment 1), the PREA Reporting Process (Attachment 2), the PREA Response Kit Contents (Attachment 3), the PREA Response Plan Contents (Attachment 4), the Prison Partners for Stand-Alone Level 2 Facilities and Reentry Centers (Attachment 5) and DOC FORMS: DOC 02-007 Aggravated Sexual Assault Checklist, DOC 02-011 PREA Response and Containment Checklist and DOC 02-021 Aggravated Sexual Assault Medical Follow-Up Checklist, address 115.64 (a).

	<p>Interview with non-security staff who acted as first responder addresses 115.64 (b).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.64: Staff first responder duties.</p>
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115.65	Coordinated response
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.850 Prison Rape Elimination Act Response 2. On-Site Response Plan without Policy Oms <p>Interviews:</p> <ol style="list-style-type: none"> 1. PREA Compliance Manager 2. Superintendent 3. Investigator 4. Medical Staff 5. Mental Health staff <p>The following policy and other documentation were reviewed: WADOC Policy 490.850 Prison Rape Elimination Act Response and the On-Site Response Plan without Policy Oms.</p> <p>The Auditor interviewed random staff, the PREA Compliance Manager, the Investigator, Medical staff, Mental Health staff and the Superintendent.</p> <p>During the Onsite tour, informal discussions were conducted by the Auditor with Clallam Bay Corrections Center Custody staff concerning how they would respond to different situations involving allegations of sexual assault or sexual harassment. In these informal discussions, staff indicated the most crucial step was to keep the victim safe, believe what the victim had stated, and take action as necessary to ensure the victim's safety.</p> <p>WADOC Policy 490.850, Section II. A. indicates the facility shall be responsible for maintaining a PREA Response Plan; the PREA Response Plan will consist of 4 sections; those sections are listed in attachment 4 of Policy 490.850.</p> <ol style="list-style-type: none"> 1. Response to Aggravated Sexual Assault Allegations 2. Response to all other Sexual Misconduct Allegations 3. Checklists and Forms for use in all Sexual Misconduct Allegations 4. Policies/Operational Memorandums composed of the documents listed in PREA

Response Plan Contents (Attachment 4).

The PREA Compliance Manager maintains the PREA Response Plan, which is located in the Shift Commander's office. The Clallam Bay Corrections Center PREA Response Plan involves coordinating staff, including First Responders, Medical and Mental Health providers, Investigators and outside law enforcement, and Executive staff.

The Auditor interviewed the PREA Compliance Manager, the Investigator and the Superintendent. In addition, the Auditor interviewed Medical and Mental Health staff. Each interviewee understood their role in response to an incident of sexual abuse/sexual misconduct at the Clallam Bay Corrections Center.

The Auditor held informal discussions with the Day Shift Lieutenant and the Swing Shift Lieutenant. Both Lieutenants were able to access the Coordinated Response Plan quickly. Both provided a detailed description of the steps required to respond appropriately to an allegation of sexual abuse or sexual harassment. In addition to directing staff to secure the victim and protect any evidence, involving medical and mental health staff was vital. Both Lieutenants stated the checklists were important and the need to document was crucial. The Coordinated Response plan contained up-to-date phone numbers for key members of the PREA Response Team, hospital and advocacy personnel. Photos maintained in the Response plan identified community advocates who could potentially respond to the hospital.

WADOC Policy 490.850, Section II, a review of the PREA Response Plan, interviews with the PREA Compliance Manager, Investigator, Superintendent, and Medical and Mental Health staff and a review of the PREA Investigation Process (Attachment 1), the PREA Reporting Process (Attachment 2) the PREA Response Kit Contents (Attachment 3) the PREA Response Plan Contents (Attachment 4), the Prison Partners for Stand-Alone Level 2 Facilities and Reentry Centers (Attachment 5) and DOC FORMS: DOC 02-007 Aggravated Sexual Assault Checklist, DOC 02-011 PREA Response and Containment Checklist and DOC 02-021 Aggravated Sexual Assault Medical Follow-Up Checklist, address 115.65 (a).

The Clallam Bay Corrections Center complies with Standard 115.65: Coordinated response.

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documents:

	<ol style="list-style-type: none"> 1. 115.66 Collective Bargaining Agreement 2. RCW 72.09.225 3. WAC 357.40.010 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Agency Head <p>The following documents were reviewed: Collective Bargaining Agreement, Article 8 Discipline and Article 3 Management Rights, RCW 72.09.225 and WAC 357.40.010.</p> <p>The Clallam Bay Corrections Center has no limit on its ability to remove alleged sexual abusers from contact with any offenders pending the outcome of an investigation. As indicated in the interview with the Agency Head, the collective bargaining agreement, RCW 72.09.225 and WAC 357.40.010, permits the agency to remove an employee from an institution when an allegation adversely affects the agency's confidence in the employee or the security of the institution. The employee may be removed from the institution setting pending an investigation and resolution of the matter in accordance with applicable laws, rules, and regulations.</p> <p>The Clallam Bay Corrections Center complies with Standard 115.66: Preservation of ability to protect offenders from contact with abusers.</p>
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115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.860 Prison Rape Elimination Act Investigation 2. Retaliation Monitoring sample <p>Interviews:</p> <ol style="list-style-type: none"> 1. Staff who Monitor Retaliation 2. Agency Head 3. Superintendent <p>The following policy was reviewed: WADOC Policy 490.860 Prison Rape Elimination Act Investigation.</p> <p>The Auditor interviewed the Agency Head, the Superintendent and staff who monitor</p>

retaliation. The Clallam Bay Corrections Center reports zero incidents of retaliation have occurred at the facility in the past 12 months.

The Clallam Bay Corrections Center prohibits retaliation against incarcerated individuals and staff who report sexual abuse or sexual harassment or cooperate with investigations.

The components of the monitoring include:

- 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 inmates or staff;
- The conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff;
- Monitor any inmate disciplinary reports;
- Monitor inmate housing changes;
- Monitor inmate program changes;
- Monitor negative performance reviews of staff; and,
- Monitor reassignments of staff.

The facility will continue monitoring beyond 90 days if initial monitoring indicates a continuing need. All retaliation cases involve an in-person interview with the offender. Additionally, emotional support services would be continuously offered and available to the victim through Mental Health.

The Superintendent indicated the facility monitors the conduct and treatment of the incarcerated individuals or staff who reported sexual abuse and those who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation. There were no incidents of retaliation during the last 12 months.

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Section II A-D., the interview with the Superintendent and staff monitoring retaliation addresses 115.67 (a).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Section II A-D., the interview with the Superintendent and staff monitoring retaliation addresses 115.67 (b).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Section II A-D., the interview with the Superintendent and staff monitoring retaliation addresses 115.67 (c).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Section II A-D., Retaliation Monitoring samples and the interview with the Superintendent and staff monitoring retaliation addresses 115.67 (d).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Section II A-D.,

	<p>Retaliation Monitoring samples and the interview with the Superintendent and staff monitoring retaliation addresses 115.67 (e).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.67: Agency protection against retaliation.</p>
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115.68	Post-allegation protective custody
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 320.200 Administrative Segregation 2. WADOC Policy 490.850 Prison Rape Elimination Act Response 3. Chrono initial placement -JR- 4. Custody Facility Plan -JR- <p>Interviews:</p> <ol style="list-style-type: none"> 1. Superintendent 2. Staff who supervise incarcerated individuals in segregated housing <p>The following policies were reviewed: WADOC Policy 320.200 Administrative Segregation and 490.850 Prison Rape Elimination Act Response.</p> <p>The PREA Compliance Manager asserts there were no circumstances within the last 12 months wherein involuntary isolation was used to protect an alleged incarcerated individual who had suffered sexual abuse.</p> <p>Incarcerated Individuals who allege to have suffered sexual abuse may not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there are no available means of separation from likely abusers. To the extent possible, access to programs, privileges, education, and work opportunities are not limited for those incarcerated individuals placed in the Administrative Segregation unit for protective custody. The facility would document the reasons for restricting access and the length of time the restrictions would last. During the audit documentation period, eight incarcerated individuals were named as victims of incarcerated individual-on-incarcerated individual sexual assault/abuse or staff sexual misconduct. After submitting an allegation, one incarcerated individual requested protective custody and was placed in segregated housing. The individual requested placement in protective custody on 10/18/2022. His placement was reviewed on 10/19/2022 and 11/02/2022. The individual was transferred to another facility on 11/18/2022 and returned to the general population.</p>

	<p>WADOC Policy 490.850 Prison Rape Elimination Act Response, Section V. D. and WADOC Policy 320.200 Administrative Segregation, Section III.A, and IV.A.1 - 3 addresses 115.68 (a).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.68: Post-allegation protective custody.</p>
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115.71	Criminal and administrative agency investigations
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	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.860 Prison Rape Elimination Act Investigation 2. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 3. WADOC Policy 400.360 Polygraph Testing of Offenders 4. 115.71 Administrative Investigations Training 5. 115.71 Appointing Authority Curriculum 6. 115.71 DOC Records Retention V1.6 7. 115.71 K8487 WSP MOU 8. Law Enforcement Meeting 2023-01-25 9. PREA - Investigators Directory 10. Clallam Bay Investigative Records <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 1. Investigator 2. Superintendent <p>The following Policies were reviewed to determine compliance with this standard: WADOC Policy 490.860 Prison Rape Elimination Act Investigation; Policy 490.800 Prison Rape Elimination Act Prevention and Reporting; and Policy 400.360 Polygraph Testing of Offenders. The training records and curriculum for the Superintendent and the Investigator were also reviewed. Interviews with the Superintendent and the Investigator were conducted, and 16 investigative files were reviewed.</p> <p>The Clallam Bay Corrections Center objectively conducts Administrative investigations into sexual abuse and sexual harassment. Criminal Investigations are referred to the Clallam County Sheriff's Office. Third-party and anonymous reports are investigated in addition to reported allegations. As noted in WADOC Policy 490.860 Prison Rape Elimination Act Investigation, the Department will thoroughly, promptly, and objectively investigate all allegations of sexual misconduct involving individuals under the jurisdiction or authority of the Department. Investigations will be completed even if the individual is no longer under Department jurisdiction or authority and the</p>
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accused staff, if any, is no longer employed by or providing services to the Department. When appropriate, the Department may discipline and refer for prosecution persons determined to be perpetrators of sexual misconduct. Investigations involving represented employees will be conducted per the applicable collective bargaining agreement provisions. Information related to investigations of sexual misconduct is confidential and will only be disclosed when necessary for related treatment, security, and management decisions. Staff who breach confidentiality may be subject to corrective/disciplinary action.

If a report is made within a one hundred twenty (120) hour time frame, staff shall ensure that the alleged victim and alleged abuser do not take any action(s) that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. If the situation warrants, staff shall ensure the security of the crime scene, including the alleged victim and alleged abuser's clothing, bedding, and object(s) used for penetration. If the alleged abuser is known, facility Investigators shall require them to follow the same actions as the alleged victim to preserve any possible evidence of sexual abuse.

Facility Investigators conducting Administrative investigations are responsible for gathering and preserving direct and circumstantial evidence; interviewing alleged victims, suspected perpetrators, and witnesses; and reviewing prior complaints and reports of sexual abuse involving the suspected perpetrator. The facility investigator described evidence collection as integrating data from various sources for corroboration, including direct and indirect evidence. The Auditor reviewed an Agency-wide Spreadsheet documenting the investigators' participation in the required training. During the interview, the facility Investigator was able to specify the training she had received, which covered how to conduct administrative sexual abuse and sexual harassment investigations.

The facility Investigator has been trained to gather and preserve direct and circumstantial evidence. Additionally, the Investigator was trained in interviewing alleged victim(s), the perpetrator(s), and potential witness(es). The Investigator stated he would review prior complaints and reports of sexual abuse involving the suspected perpetrator. When interviewed, the facility Investigator was able to describe evidence-gathering techniques and the process to substantiate an administrative allegation of sexual abuse or sexual harassment. The facility Investigator described how he would utilize telephone conversations and written correspondence to substantiate the presence or absence of individuals in locations where PREA allegations had reportedly occurred.

Interviews with the Superintendent and the Investigator indicate that all reported incidents of alleged sexual abuse and sexual harassment were investigated, direct reports, third party and anonymous reports. Reports of alleged sexual abuse and harassment were all investigated objectively at the appropriate administrative or criminal level.

When sexual abuse is alleged, only those staff who have completed specially

designed investigator training are assigned to investigate. If an investigation is under the responsibility of an appointing authority other than the facility Superintendent or is an investigation of a sensitive nature, the investigation may be assigned to a trained investigator outside of the facility.

The Washington State Department of Corrections (WADOC) Investigators are trained to complete reports detailing all facts available regarding a PREA allegation. The Investigator remains separate from the finding process to ensure neutrality and consistency in sanction application. The finding process employed is as follows:

1. The assigned Investigator submits the investigation packet to the Appointing Authority, ensuring all evidence and witness testimony is documented in the report, which the Appointing Authority then reviews for completeness.
2. Once the investigation is determined to be complete, the Appointing Authority reviews evidence, witness testimony, and prior complaints and reports of sexual misconduct. The Appointing Authority also assesses the credibility of all witnesses involved in the investigation. This information is documented on the investigation finding sheet completed by the Appointing Authority.
3. The Appointing Authority determines if the allegations are substantiated, unsubstantiated or unfounded based upon a preponderance of the evidence.

Appointing Authorities are required to complete PREA training specific to their role. They must also complete the same training provided to all PREA investigators to ensure a thorough working knowledge of the investigation process.

The Auditor reviewed 15 investigation files. Each closed case contained all the appropriate documentation, and each incident was investigated promptly, thoroughly, and objectively by a qualified Investigator who had received training and education and had the authority to conduct such investigations. The Auditor noted each file contained documentation, including but not limited to the initial incident report, Investigators' report, Multiple Checklists, and Memorandums. The Auditor noted that each case file was well organized, extremely detailed, and contained all the required documentation. Upon the Auditor's review of the eight PREA investigations conducted at the facility, it was clear that multiple evidence-gathering techniques were used to investigate each allegation of sexual abuse or sexual harassment thoroughly (e.g., interviews from a variety of sources, secondary interviews with key subjects, location of the alleged victim and abuser, telephone conversation review, historical video monitoring, etc.).

All investigations that appear criminal must be referred to local law enforcement. If an administrative investigation appears to be moving towards the possibility of criminal prosecution, Facility investigators are obligated to consult with law enforcement regarding conducting compelled interviews.

The facility Investigator indicated that during investigations that appear to support a criminal prosecution, training stipulated only to conduct compelled interviews after consultation with local law enforcement about whether compelled interviews may

pose an obstacle for subsequent criminal prosecution.

The Investigator assesses each alleged victim, suspect, or witness individually and does not determine the individual's credibility based on their status as an offender or staff member. Additionally, the offender who alleges sexual abuse will not be required to submit to a polygraph or other truth-telling device.

The Investigator stated that each investigation attempts to determine whether staff actions or failures to act contributed to the alleged sexual abuse; WADOC Form 02-378, Investigative Finding Sheet contains a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

As reported in the Pre Audit Questionnaire, in the past 12 months, the number of allegations resulting in an administrative investigation was 13, and the number of allegations referred for criminal investigation was three. The Auditor notes that the Clallam Bay Corrections Center provided information on 16 investigations between June 2022 and May 2023.

If local law enforcement could not respond or declined to investigate the crime scene, the Washington State Patrol (WSP) Crime Scene Response Unit could conduct a criminal investigation at the facility. The Washington State Department of Corrections maintains a Memorandum of Understanding with the Washington State Patrol to conduct general investigations. All substantiated cases of sexual misconduct that appear to be criminal are referred for prosecution. Two of the eight investigations reviewed by the Auditor had been referred to Law Enforcement. Both cases were declined, and Administrative Investigations were conducted.

The Clallam Bay Corrections Center holds annual meetings with the Clallam County Sheriff's Office to delineate investigatory needs, standards, and expectations. The Auditor reviewed the meeting minutes of March 1, 2023, which included a discussion regarding the need to maintain compliance with PREA standards. Additionally, Policies 490.850, 490.860, and 610.025 were distributed and discussed. The Clallam Bay Corrections Center Staff discussed that they would continue to make referrals in the future to ensure full compliance with the Department of Justice (DOJ) PREA standards around referring any allegation that appears criminal. It was determined that the current process works well for Clallam Bay and Clallam County Sheriff's Department. The Washington State Patrol has not been called upon to investigate an allegation. There was also a discussion regarding Advocates and the Local Advocacy Group Mariposa House.

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Policy I - IV addresses 115.71 (a).

Interview with the Facility Investigator and the Superintendent and a review of the training records address 115.71 (b).

Interview with the Facility Investigator, the Superintendent and 115.71 Administrative Investigations pages 18-20 address 115.71 (c).

	<p>Interviews with the Facility Investigator and 115.71 Administrative Investigations Training, pages 38-42 address 115.71 (d).</p> <p>WADOC Policy 400.360 Polygraph Testing of Offenders, Policy IV., Interviews with the Facility Investigator, 115.71 Appointing Authority Curriculum section 4.7 Assessing Witness Credibility and 115.71 Administrative Investigations Training, page 72, Credibility Indicators address 115.71 (e).</p> <p>Interviews with the Facility Investigator and a review of Form 02-378 address 115.71 (f).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation section 1. A. 3 and X. A. 1. f., interviews with the Facility Investigator, Superintendent and the Annual Law Enforcement Meeting minutes, addresses 115.71 (g).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation section 1. A. 3., interviews with the Facility Investigator, Superintendent and the Annual Law Enforcement Meeting (h)</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation section X., and 115.71 DOC Records Retention V1.6 page 37, addresses 115.71 (i).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Policy 1. A. addresses 115.71 (j).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.71: Criminal and administrative agency investigations.</p>
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115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting 2. WADOC Policy 490.860 Prison Rape Elimination Act Investigations 3. 115.72 RCW 72-09-225 4. Clallam Bay Investigation Records <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 1. Investigative Agent 2. Superintendent

The following policies were reviewed: WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, and Policy 490.800 Prison Rape Elimination Act Prevention and Reporting. RCW 72-09-225 was also reviewed.

The Auditor interviewed the Investigator and the Superintendent.

The Washington State Department of Corrections Investigators are trained to complete reports detailing all facts regarding a PREA allegation. The investigator remains separate from the finding process to ensure neutrality and consistency in sanction application. The finding process employed is as follows:

1. The assigned investigator submits the investigation packet to the Appointing Authority to review for completeness.
2. Once the investigation is complete, the Appointing Authority reviews evidence, witness testimony, and prior complaints and reports of sexual misconduct. The Appointing Authority also assesses the credibility of all witnesses involved in the investigation.
3. The Appointing Authority determines if the allegations are substantiated, unsubstantiated or unfounded based on a preponderance of the evidence.

Appointing Authorities must complete training specific to their role as decision-makers in these investigations. They must also complete the same training provided to all PREA investigators to ensure a thorough working knowledge of the investigation process. The Revised Code of Washington (RCW) 72.09.225 also directs actions to be taken with employees or contractors who have sexual contact with offenders.

As noted in 490.860, section 1.F., For each allegation in the report, the Appointing Authority will determine whether the allegation is:

- Substantiated: The allegation was determined to have occurred by a preponderance of the evidence.
- Unsubstantiated: Evidence was insufficient to determine whether the allegation was true or false.
- Unfounded: The allegation was determined not to have occurred.

In his interview, the Superintendent (Appointing Authority) stated that he imposes a standard of a preponderance of the evidence in determining the outcome of an administrative investigation.

WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section I.F.1. and interviews with the Investigator and the Superintendent, address 115.72 (a)

The Clallam Bay Corrections Center complies with Standard 115.72: Evidentiary standard for administrative investigations.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

1. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting
2. WADOC Policy 490.860 Prison Rape Elimination Act Investigations
3. Clallam Bay Investigation Records

Interviews:

1. Superintendent
2. Investigator

The following policies were reviewed: WADOC Policy 490.860 Prison Rape Elimination Act Investigations, and Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting.

Incarcerated Individuals are informed of the results of the investigation. That information includes whether the staff member is or is not allowed to work in the incarcerated individual's unit, whether the staff member is or is not employed, whether the staff member has been indicted, or whether the staff member has been convicted. In addition, if the alleged abuser is an incarcerated individual, the victim would be informed if the alleged abuser was indicted and or convicted. All notifications are documented.

Policy DOC 490.860 Prison Rape Elimination Act Investigations, 490.860 section I.G.,

- *Once the Appointing Authority has made a determination, the alleged victim will be notified of the findings.*
- *1. The Appointing Authority/designee of the facility where the individual is housed will inform the individual of the findings in person in a confidential manner.*
 - *a. Notification may be provided in writing if the individual is in restrictive housing.*
- *2. If the individual has been released, the Appointing Authority will inform the individual of the findings in writing to the last known address as documented in the electronic file.*

If an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity to inform the incarcerated individual of the outcome of the investigation. Policy 490.860 Prison Rape Elimination Act Investigations, section 1 A 3: "All allegations that appear to be criminal will be referred to law enforcement for investigation by the Appointing Authority/designee. Investigation reports received from law enforcement will be submitted as an

attachment to the final PREA investigation report".

Following an investigation into an incarcerated individual's allegation that they suffered sexual abuse at the facility, the incarcerated individual shall be informed whether the allegation has been substantiated, unsubstantiated or unfounded. If the facility did not conduct the investigation, the relevant information shall be requested from the outside investigating agency or entity in order to inform the incarcerated individual.

Following an incarcerated individual's allegation that an employee has committed sexual abuse against the incarcerated individual, the facility shall subsequently inform the incarcerated individual (unless the facility has determined that the allegation is unfounded) whenever the employee is no longer posted within the incarcerated individual unit as a result of the findings of the investigation; the employee is no longer employed at the facility as a result of the allegation; the facility learns that the employee has been indicted on a charge related to sexual abuse within the facility, or the facility learns that the employee has been convicted on a charge related to sexual abuse within the facility. (Policy 490.860 Prison Rape Elimination Act Investigation section VIII.)

Following an incarcerated individual's allegation that they have been sexually abused by another incarcerated individual, the facility shall subsequently inform the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility or the facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. All notifications or attempted notifications shall be documented. The agency's obligation to notify the incarcerated individual shall terminate if the incarcerated individual is released from custody. The Superintendent is responsible for tracking all cases and the required notifications and forwarding copies to the PREA Coordinator. (Policy 490.860 Prison Rape Elimination Act Investigation section VIII.)

The Auditor reviewed 16 investigation files. The date range for the investigations was from June 2022 through July 2023. The review of the investigative files included the date of the allegation, the date of investigation initiation, and whether it involved staff, an incarcerated individual or both. The classification of sexual abuse or sexual harassment, the case disposition, was the disposition justified, who the investigating officer was, and the date of notification to the incarcerated individual.

WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section VIII, Clallam Bay Investigation Records, interviews with the Superintendent, and the Investigator addresses 115.73 (a).

WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section I.A.3, and Clallam Bay Investigation Records address 115.73 (b).

WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section VIII, A., and Clallam Bay Investigation Records, address 115.73 (c).

WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section VIII,

	<p>A., and Clallam Bay Investigation Records, address 115.73 (d).</p> <p>WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section VIII, B., and Clallam Bay Investigation Records, address 115.73 (e).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.73: Reporting to Incarcerated Individuals.</p>
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115.76	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 2. WADOC Policy 490.860 Prison Rape Elimination Act Investigation 3. 115.76 WAC 357-40-010 4. 115.76 RCW 72-09-225 5. 115.76 CBA Teamsters 6. 115.76 Secretary memorandum Discipline <p>The following policies were reviewed: WADOC Policy DOC 490.800 Prison Rape Elimination Act Prevention and Reporting, and 490.860 Prison Rape Elimination Act Investigation. The Auditor also reviewed 115.76 CBA Teamsters, Washington Administrative Code 357-40-010, Revised Code of Washington 72-09-225, 115.76 Secretary memorandum Discipline and 115.76 LE notification Response 03-505.</p> <p>The Clallam Bay Corrections Center staff are subject to disciplinary sanctions, including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>Agency Human Resource policies do not specify termination as a presumptive discipline in instances of sexual abuse. However, RCW 72.09.225, "Sexual misconduct by state employees, contractors, states:</p> <ul style="list-style-type: none"> • <i>The Secretary shall immediately institute proceedings to terminate the employment of any person:</i> • <i>Who is found by the department, based on a preponderance of the evidence, to have had sexual intercourse or sexual contact with the offender; or</i> • <i>Upon a guilty plea or conviction for any crime specified in chapter 9A.44 RCW when the victim was an offender.</i> <p>Washington State Department of Corrections employees must adhere to all state and federal laws. Concerning a PREA allegation, the Agency shall conduct proceedings for</p>

staff who have engaged in sexual misconduct per RCW 79.02.225. Sanctions for violations of agency policies related to sexual misconduct (other than actually engaging in sexual abuse) shall be commensurate with the act committed, the staff member's employment history and the sanctions imposed for comparable offenses by other staff with similar histories. As Policy 490.800, Prison Rape Elimination Act (PREA) Prevention and Reporting, states, "The Department has zero tolerance for all forms of sexual misconduct. The Department will impose disciplinary sanctions for such conduct, up to and including dismissal for staff." (Policy 490.800, Policy I. A.)

The Agency tracks all staff terminations and licensing notifications. The PREA Compliance Manager indicated zero staff terminations for violations of agency sexual abuse or sexual harassment policies at the Clallam Bay Corrections Center in the past 12 months. The PREA Compliance Manager stated appropriate notifications would be made to licensing boards or other agencies by the Agency. As Policy 490.860 Prison Rape Elimination Act (PREA) Investigations noted, the Superintendent will ensure the finding(s) are reported to relevant licensing bodies. (Policy 490.860 Prison Rape Elimination Act (PREA) Investigations, IV, C.2.)

WADOC Policy DOC 490.800 Prison Rape Elimination Act Prevention and Reporting, page 1, Policy I. A., 115.76 RCW 72.09.225 Sexual misconduct by state employees, contractors, 115.76 WAC 357.40.01, and 115.76 notification of employee termination, addresses 115.76 (a).

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, page 1, Policy I. - IV., Policy 490.860 115.76 RCW 72.09.225 Sexual misconduct by state employees, contractors, and 115.76 Secretary memorandum Discipline address 115.76 (b).

115.76 RCW 72.09.225 Sexual misconduct by state employees, contractors, 115.76 WAC 357.40.01 and 115.76 Secretary memorandum Discipline address 115.76 (c).

WADOC Policy DOC 490.800 Prison Rape Elimination Act Prevention and Reporting, page 1, Policy I. A., Policy 490.860, Prison Rape Elimination Act Investigation, section IV. A. - D., and LE Notification Response 03505 address 115.76 (d).

The Clallam Bay Corrections Center complies with Standard 115.76: Disciplinary sanctions for staff.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documents:
	1. WADOC Policy DOC 450.050 Prohibited contact

2. WADOC Policy DOC 490800 Prison Rape Elimination Act Prevention and Reporting
3. WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigation
4. 115.77 RCW 72-09-225

Interviews

1. Superintendent

The following policies were reviewed: WADOC Policy 450.050 Prohibited Contact, 490.800 Prison Rape Elimination Act Prevention and Reporting, and 490.860 Prison Rape Elimination Act Investigation. In addition, the Auditor reviewed the Revised Code of Washington 72-09-225.

Any volunteer or contractor who engages in sexual abuse or sexual harassment shall be prohibited from contact with offenders and reported to law enforcement agencies and any relevant licensing body. The PREA Compliance Manager stated appropriate notifications would be made to licensing boards or other agencies by the agency.

The PREA Compliance Manager reports there have been no incidents of contractors or volunteers violating the Standards of Conduct at the Clallam Bay Corrections Center within the past 12 months.

WADOC Policy DOC 490.800 Prison Rape Elimination Act Prevention and Reporting, section, I.A.2, Policy 450.050 Prohibited Contact, section III, and Policy DOC 490.860 Prison Rape Elimination Act Investigation, Policy I.A. II., section I.L. and IV.B. and Revised Code of Washington 72-09-225 address 115.77(a).

WADOC Policy DOC 490.800 Prison Rape Elimination Act Prevention and Reporting, section, I.A.2, Policy 450.050 Prohibited Contact, section III, Policy DOC 490.860 Prison Rape Elimination Act Investigation, Policy I.A. II., section I.L. and IV.B. and the interview with the Superintendent address 115.77 (b).

The Clallam Bay Corrections Center complies with Standard 115.77: Corrective action for contractors and volunteers.

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Documents: <ol style="list-style-type: none"> 1. WADOC Policy 450.050 Prohibited Contact 2. WADOC Policy 460.050 Disciplinary Sanctions

3. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting
4. WADOC Policy 460.000 Disciplinary Process for Prisons
5. WADOC Policy 490.860 Prison Rape Elimination Act Investigation
6. 115.78 WAC 137-25-020 - Definitions
7. 115.78 WAC 137-28-310 - Decision of Hearing Officer
8. 115.78 WAC 137-28-360 - Sanctions and Mental Status
9. 115.78 WAC 137-28 - Discipline in Prisons
10. 115.78 WAC 137-28-140 Purpose
11. 115.78 Statewide Orientation Handbook 2021
12. 637.pdf

Interviews conducted with

1. Mental Health Specialist
2. Superintendent

The Auditor reviewed WADOC Policies 450.050 Prohibited Contact, 460.050 Disciplinary Sanctions, Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Policy 460.000 Disciplinary Process for Prisons and Policy 490.860 Prison Rape Elimination Act Investigation.

Clallam Bay Corrections Center incarcerated individuals are subject to disciplinary sanctions following an administrative finding that the incarcerated individual had engaged in incarcerated individual-on-incarcerated individual sexual abuse. The Disciplinary Sanctions Policy 460.050, page 5, section VI indicates for substantiated PREA allegations against an individual, an infraction report must be written against the accused, and an individual who is found guilty of committing sexual assault against a staff member (code violation 611), committing an act of sexual contact against a staff member (code violation 613), committing a sexual assault against another incarcerated individual (code violation 635) or committing sexual abuse against another offender (code violation 637) may be sanctioned to a multidisciplinary Risk Management Team review for consideration of available interventions (e.g., Mental Health Therapy, Sex Offender Treatment and Assessment Program, Anger Management). The Auditor's interview with the Mental Health Specialist verified these programs were available at other WADOC facilities and generally offered by Mental Health. Should an incarcerated individual require programming of this nature, they would be referred for placement at the appropriate location where an assessment regarding the incarcerated individual's treatment needs would be conducted. The Clallam Bay Corrections Center may discipline an incarcerated individual for sexual contact with a staff member if the staff member does not consent to such contact. (Policy 460.050 Attachment 1, Codes 604, 611 and 614).

The PREA Compliance Manager indicates one substantiated administrative investigation of incarcerated individual-on-incarcerated individual sexual abuse/assault has occurred in the past 12 months. The perpetrator was subjected to a formal disciplinary process and was found to have committed the prohibited act. (637. pdf)

Disciplinary sanctions administered for an incarcerated individual found guilty of engaging in incarcerated individual-on-incarcerated individual sexual abuse or sexual harassment would be commensurate with the nature and circumstances of the abuse committed. The incarcerated individual's disciplinary record, prior conduct, mental status, overall facility adjustment, and employee/contract staff recommendations may be considered when determining appropriate sanctions. Up to the maximum sanction allowed for any offense may be imposed under the Washington Administrative Code (WAC) 137-28-240 and WAC 137-28-350.

Policy 490.860, Prison Rape Elimination Act Investigation, indicates a report of sexual abuse made in good faith will not constitute providing false information, even if the investigation does not establish sufficient evidence to substantiate the allegation. (490.860 section, V.B.2.b). The PREA Compliance Manager reports that no offenders were disciplined for sexual conduct with a staff member in the past 12 months at the Clallam Bay Corrections Center.

Consensual, non-coerced sexual activity between individuals under the Department's jurisdiction is prohibited by Department rule as noted in Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, attachment 1. Infractions for providing false or misleading information during any stage of an investigation of sexual misconduct, as defined in Policy 490.860 Prison Rape Elimination Act Investigation, require the completion of a formal investigation with an unfounded finding and a determination by the Appointing Authority that the allegation was not made in good faith.

WADOC Policy 460.050, Disciplinary Sanctions, section 1. A. and section VI, Policy 490.860 Prison Rape Elimination Act Investigation, section V., and Policy 460.000 Disciplinary Process for Prisons, section II.B. and section IV.G.3.a. and 637.pdf, addresses 115.78 (a).

115.78 WAC 137-28 - Discipline in Prisons (all), 115.78 WAC 137-28-360 - Sanctions and Mental Status (specifically), WADOC Policy 460.050, Disciplinary Sanctions (all) and the interview with the Superintendent address 115.78 (b).

115.78 WAC 137-28 - Discipline in Prisons (all), 115.78 WAC 137-28-360 - Sanctions and Mental Status (specifically), 637.pdf, and the interview with the Superintendent address 115.78 (c).

WADOC Policy Disciplinary Sanctions Policy 460.050, page 5, section VI and the interview with Mental Health staff address 115.78 (d).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section V.B.1 addresses 115.78 (e).

WADOC Policy 490.860 section, V.B.2.b addresses 115.78 (f).

WADOC Policy 490.800, Prison Rape Elimination Act Prevention and Reporting, attachment 1, and Statewide orientation handbook 2021 page 11, addresses 115.78 (g).

	The Clallam Bay Corrections Center complies with Standard 115.78: Interventions and disciplinary sanctions for incarcerated individuals.
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115.81	Medical and mental health screenings; history of sexual abuse
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 610.025 Health Services Management of alleged Sexual Misconduct cases 2. WADOC Policy 640.020 Health Records Management 3. WADOC Policy 630.500 Mental Health Services 4. WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments 5. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 6. 115.81 Health Record Procedure (HRP) 7. 115.81 HRP Minimum Necessary for No-Health Services Staff 8. 13-509 Yes 9. 13-509 No 10. Incoming transport job screen.pdf <p>Interviews:</p> <ol style="list-style-type: none"> 1. Mental Health Specialist 2. Staff who conduct Risk assessments (Classification Counselor) 3. Incarcerated Individuals who disclosed sexual victimization during risk screening <p>The following policies were reviewed: WADOC Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases, 640.020 Health Records Management, 630.500 Mental Health Services, 490.820 Prison Rape Elimination Act Risk Assessments and Assignments, and 490.800 Prison Rape Elimination Act Prevention and Reporting. The Auditor interviewed a Mental Health Specialist who indicated that incarcerated individuals who experienced prior sexual victimization are provided the opportunity to meet with a Mental Health Specialist within 14 days of intake screening.</p> <p>The Clallam Bay Corrections Center staff (Classification Counselors) arrange a follow-up meeting with a mental health practitioner for incarcerated individuals who disclose any prior sexual victimization during screening.</p> <p>During his interview, the Mental Health staff member indicated that sexual harassment or abuse victims are offered treatment. Treatment plans and information</p>

related to sexual victimization are limited to mental health practitioners as necessary. Applicable rules concerning private medical information are strictly enforced. Incarcerated Individuals are made aware of the reporting requirements and what is considered protected information.

The Clallam Bay Corrections Center and Mental Health staff work together to collect and monitor information indicating prior sexual victimization. Any information about victimization is limited to a need-to-know basis. Supervisory staff members are informed of the information for housing placement. Interviews with Staff confirm compliance with this standard.

Relevant information informs mental health treatment plans and security decisions, such as housing and program assignments. Mental Health clinical notes are maintained separately from the offenders' central file.

The PREA Compliance Manager indicated that the Clallam Bay Corrections Center ensures that offenders who have previously perpetrated sexual abuse are offered a follow-up meeting with a mental health practitioner. Mental health staff members maintain secondary materials (e.g., screening assessment, treatment documentation) that document all incarcerated individuals who have disclosed any prior sexual victimization during a screening pursuant to 115.41. Incarcerated Individuals are offered a follow-up meeting with a medical or mental health practitioner. Information about sexual victimization or abuse in the institutional setting is strictly limited. The Clallam Bay Corrections Center ensures that incarcerated individuals who have previously been victims of sexual abuse outside an institutional setting are offered supportive services and that the information related to their prior victimization is not disclosed without their consent. Mental Health and Medical Staff inform all incarcerated individuals through standard confidentiality disclosures as part of their routine practices.

During the onsite visit, a Classification Counselor provided information about the referral process for incarcerated individuals who needed medical or mental health follow-up. The Classification Counselor indicated the PREA Mental Health Notification form (DOC 13-509) would be used to provide information to Mental Health. This form documents the reason for the notification and provides a response as to whether or not the Incarcerated individual would participate in a follow-up meeting. Finally, the form documents the Mental Health Staff's response.

The Classification Counselor understood that if the Incarcerated individual expressed a history of sexual victimization or perpetration, the Incarcerated individual was to be offered a referral to Mental Health to discuss potential treatment needs. The Incarcerated Individual has the right to refuse this contact, but the Counselor must document the referral offer. If the Incarcerated Individual reports a history of sexual victimization or sexual abusiveness and accepts the referral to Mental Health, the Staff ensures that the Incarcerated Individual is offered a follow-up meeting with a medical or mental health practitioner within fourteen (14) days of the PREA Risk Assessment to discuss their history.

WADOC Policies 490.820 Prison Rape Elimination Act Risk Assessments and

	<p>Assignments, section IV, 630.500 Mental Health Services, section III.B.1.b., and interviews with Staff who conduct risk assessments, mental health staff and incarcerated individuals who disclosed sexual victimization during risk screening, addresses 115.81 (a).</p> <p>WADOC Policies 490.820 Prison Rape Elimination Act Risk Assessments and Assignments, section IV, 630.500 Mental Health Services, section III.B.1.b., 13-509 Yes 13-509 No and interviews with Staff who conduct risk assessments, and mental health staff address 115.81 (b).</p> <p>490.800 Prison Rape Elimination Act Prevention and Reporting Policy IV., 640.020 Health Records Management section V. A., 610.025 Health Services Management of alleged Sexual Misconduct cases, section, I.C.,11581 Health Record Procedure Page 28, Health Record Management Procedure Non-Health Services Staff Page 2, addresses 115.81 (d)</p> <p>610.025 Health Services Management of alleged Sexual Misconduct cases, section I.C, addresses 115.81 (e).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.81: Medical and mental health screenings; history of sexual abuse.</p>
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 600.025 Health Services Co-payment Program 2. WADOC Policy 600.000 Health Services Management 3. WADOC Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases 4. WADOC Policy 490.850 Prison Rape Elimination Act Response 5. RCW 7.68.170 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Medical Staff 2. Mental Health staff 3. Security Staff and Non-Security Staff First Responders 4. Incarcerated Individual who reported sexual abuse <p>The following policies were reviewed: WADOC Policy 600.025 Health Services Co-payment Program, Policy 600.000 Health Services Management, Policy 610.025</p>

Health Services Management of Alleged Sexual Misconduct Cases and Policy 490.850 Prison Rape Elimination Act Response.

The Auditor interviewed Medical Staff, Mental Health Staff, Security Staff First responders and an Incarcerated Individual who reported sexual abuse.

The following observations were made during the on-site tour of the facility: The Auditor observed the information provided to the offenders concerning the Office of Crime Victims Advocate and the services provided to incarcerated individuals who have been victims of sexual abuse.

The Clallam Bay Corrections Center's procedures for access to emergency and mental health services are well documented. Medical staff members are responsible for examining, documenting, and treating offender injuries arising from sexually abusive behaviors, including testing when appropriate for pregnancy and sexually transmissible infections (STIs), including HIV. When an incarcerated individual self-reports or is referred to Health Services, medical staff notify Mental Health and Correctional Services before conducting an injury assessment. The injury assessment and the incarcerated individuals' subjective/objective findings are documented fully in the electronic health record. Health Services staff perform the injury assessment without compromising forensic evidence.

Qualified sexual assault examiners perform the forensic examination (e.g., Sexual Assault Nurse Examiner, Forensic Nurse Examiner, or Sexual Assault Forensic Examiner). The incarcerated Individual is examined at a local community facility (e.g., Forks Memorial) equipped to conduct such examinations. The forensic examination occurs as soon as practicable. An incarcerated individual's refusal of a forensic examination is documented in the electronic health record.

When community care is completed, institution providers render follow-up care, including screening for infectious disease (HIV, viral hepatitis, or other sexually transmissible infections), pregnancy testing for female victims, and administration of prophylactic medication (if exposure to bloodborne pathogens is suspected) if these services were not already rendered during the community visit.

Health Services clinicians also perform a physical injury assessment on any alleged perpetrators without compromising forensic evidence. Providers document the assessment in the electronic health record. Forensic examinations of perpetrators will be in consultation with relevant law enforcement agencies, conducted at the community hospital and consistent with applicable laws and policies.

Information and access to care are offered to all victims, as clinically indicated. Washington State Department of Corrections policies concerning offender co-pays for medical treatment are not applied to victims of sexual abuse.

During the audit documentation period, there were no reported cases of an aggravated sexual assault that indicated a forensic medical examination.

WADOC Policy 610.025 Health Services Management of Alleged Sexual Misconduct

	<p>Cases, section II B. and section III A - G and interviews with Medical Staff, Mental Health Staff and Incarcerated Individuals who reported sexual abuse, address 115.82 (a).</p> <p>WADOC Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases, section II B. and section III A - G and the interview with Security Staff and Non-Security Staff First Responder address 115.82 (b).</p> <p>Interview with Medical Staff, Mental Health Staff and Incarcerated Individuals who reported sexual abuse, address 115.82 (c).</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act Response, section VI. A., Policy 600.000 Health Services Management, Policy I. B.1, Policy 600.025 Health Services Co-payment Program I.B.6., and RCW 7.68.170 address 115.82 (d).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.82: Access to emergency medical and mental health services.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 600.025 Health Services Co-payment Program 2. WADOC Policy 600.000 Health Services Management 3. WADOC Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases 4. WADOC Policy 490.850 Prison Rape Elimination Act Response 5. WADOC Policy 630.500 Mental Health Services 6. RCW 7.68.170 7. 13-509 O.B. <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 1. Mental Health Staff 2. Medical Staff <p>The following policies were reviewed: WADOC Policy 600.025 Health Services Co-payment Program, Policy 600.000 Health Services Management, Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases, Policy 630.500 Mental Health Services and Policy 490.850 Prison Rape Elimination Act Response. In addition, the Auditor interviewed a Mental Health Staff member and a Medical Health</p>

staff member.

When an allegation is reported to the Clallam Bay Corrections staff, the alleged victim is referred to medical as necessary and asked if they want to see a mental health provider. The request is documented in the PREA Response and Containment Checklist. Mental health referrals are made using the Mental Health Notification forms, which document the incarcerated individual's participation or declination of services. Policy 610.025, Health Services Management of Offenders in Cases of Alleged Sexual Misconduct, states: "If a report of sexual assault or staff sexual misconduct is made more than 120 hours after and within 12 months of the alleged incident, incarcerated individuals will be referred for medical follow-up. The health care provider will evaluate and treat the incarcerated individual as medically necessary, including testing for and treatment of infections and prevention of pregnancy, if applicable."

The following mental health process has been implemented to ensure continuity of care for incarcerated individuals: The Primary Therapist will develop and implement a treatment plan. If the incarcerated individual is scheduled for transfer or release before the completion of the treatment plan, the Primary Therapist offers release planning services. For incarcerated individuals scheduled for release and screened as eligible for Department of Social and Health Services benefits, a Behavioral Health Discharge Summary will be completed and provided to the incarcerated individual.

The Primary Therapist or social worker will document referral efforts and results in the Primary Encounter Report entry in the patient's medical record.

The Clallam Bay Corrections Center provides ongoing medical and mental health care for sexual abuse victims through facility and community health providers.

Appropriate follow-up services, treatment plans, and continuing care are available. Appropriate STD tests, as medically indicated, would be provided. There would be no cost to the incarcerated individual for this care. Information and access to care are offered to all victims, as clinically indicated. Clallam Bay Corrections Center policies concerning incarcerated individuals' co-pays for medical treatment are not applied to victims of sexual abuse.

WADOC Policy 600.000 Health Services Management, section I.A.1., Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases, section III. A -I and Policy 630.500 Mental Health Services, section III.B.1.b., addresses 115.83 (a).

Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases, Policy 630.500 Mental Health Services, and interviews with Medical and Mental Health staff address 115.83 (b).

Interviews with Medical and Mental Health Staff address 115.83 (c).

Clallam Bay Corrections Center is an all-male facility. 115.83 (d) and (e) are not applicable.

WADOC Policy 610.025, Health Services Management of Alleged Sexual Misconduct

	<p>Cases section III A – I, section V A. – C., and interviews with Medical Staff, address 115.83 (f).</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act Response, section VI. A., Policy 600.000 Health Services Management, Policy I. B.1, Policy 600.025 Health Services Co-payment Program I.B.6., and RCW 7.68.170, address 115.83 (g).</p> <p>WADOC Policy 610.025 section VI and the interview with Mental Health staff and 13-509 O.B., addresses 115.83 (h).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.83: Ongoing medical and mental health care for sexual abuse victims and abusers.</p>
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WDOC Policy 490.860 Prison Rape Elimination Act Investigation 2. DOC 02-383 Local PREA Investigation Review Checklist 3. Clallam Bay SAIR records <p>Interviews:</p> <ol style="list-style-type: none"> 1. Incident Review Team member 2. Superintendent 3. PREA Compliance Manager <p>The following policy was reviewed: WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigation. In addition, the Auditor reviewed two Local PREA Review Committee reports.</p> <p>The Superintendent will ensure that a post-investigation review (Local PREA Review) of a sexual abuse incident is conducted at the conclusion of every sexual abuse investigation unless the allegation has been deemed unfounded. In addition to the Superintendent, the incident review team shall include upper-level facility management and the PREA Compliance Manager, with input from line supervisors, investigators, and medical or mental health practitioners. Such a review shall ordinarily occur within thirty (30) days of the conclusion of the investigation. The review team shall consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;</p>

consider whether the incident or allegation was motivated by race, ethnicity, gender identity; LGBTI and/or Gender Non-Conforming identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts, and assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

All findings and recommendations for improvement will be documented in the Local PREA Review. The PREA Compliance Manager and the Agency PREA Coordinator review the Local PREA Review. The facility shall implement the recommendations for improvement or shall document reasons for not doing so.

The Clallam Bay Corrections Center reports that in the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that was followed by a sexual abuse incident review within 30 days, excluding only “unfounded” incidents, is seven. Upon review, the Auditor determined each of these incidents was reviewed within 30 days of the completion of the investigation and considered:

- Whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
- Whether the incident or allegation was motivated by race, ethnicity, gender identity; LGBTI and/or Gender Non-Conforming identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility;
- Examined the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
- Assessed the adequacy of staffing levels in that area during different shifts and
- Assessed whether monitoring technology should be deployed or augmented to supplement supervision by staff.

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section III, the Clallam Bay SAIR records and the interview with an Incident Review Team member, addresses 115.86 (a)

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section III, B., the Clallam Bay SAIR records and the interview with an Incident Review Team member address 115.86 (b).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section III, C., the Clallam Bay SAIR records and the interview with the Superintendent address 115.86 (c).

DOC 02-383 Local PREA Investigation Review Checklist and interviews with the Superintendent, PREA Compliance Manager and Incident Review Team Member

	<p>address 115.86 (d).</p> <p>DOC 02-383 Local PREA Investigation Review Checklist and interviews with the Superintendent, PREA Compliance Manager and Incident Review Team Member address 115.86 (e).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.86: Sexual abuse incident reviews.</p>
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115.87	Data collection
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	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 2. WADOC Policy 490.860 Prison Rape Elimination Act Investigation 3. WADOC Policy 490.850 Prison Rape Elimination Act Response 4. 2021 SSV Summary <p>The following policies were reviewed, WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Policy 490.860 Prison Rape Elimination Act Investigation and Policy 490.850 Prison Rape Elimination Act Response. In addition, the Survey of Sexual Victimization State Prison Systems Summary for 2021 was reviewed.</p> <p>The Washington State Department of Corrections has established a PREA allegation and case database within the Offender Management Network Information (OMNI) system. This system allows for the standardized collection of the following data elements:</p> <ul style="list-style-type: none"> • Case outcomes and sanctions • Accused (gender, age, race, also height and weight if the accused is an incarcerated individual) • Investigation participants (witnesses, alleged victim, accused, reporter) • Source of allegation • Location (facility and location within the facility) Date allegation was received • Date and time of incident Type of allegation • Individual reporting the information Date and time reported • Who the information was reported to Incident description • Investigation finding • Alleged victim (gender, age, race, height, weight if the accused is an Incarcerated Individual) • Referral (law enforcement, prosecution, licensing body) and disposition of

<p>Case notes</p> <p>The Washington State Department of Corrections utilizes an Incident Report Database to record and track all PREA incidents from the initial report made at the facility level through the investigative and review process. Data is gathered consistent with the definitions found in the United States Department of Justice PREA Standards. The aggregated data includes all categories of data necessary to respond to the Survey of Sexual Victimization. Data collected for this purpose is securely stored and retained. All case records associated with claims of sexual abuse, including incident reports, investigative reports, incarcerated individual information, case disposition, medical and counseling evaluation findings, and recommendations, are retained for at least ten years after the initial collection date.</p> <p>WADOC Policy 490.800 section, I.A.1.a. and Attachment 1, PREA Definitions and 490.860 section, I.D. address 115.87 (a).</p> <p>WADOC Policy 490.860 section, Section IX.B.1. and 2021 SSV Summary address 115.87 (b)</p> <p>WADOC Policy 490.860 section, Section IX.B.1., addresses 115.87 (c).</p> <p>WADOC Policy 490.860 section, Section IX.B.1., and the PREA allegation and case database within the Offender Management Network Information (OMNI) system addresses 115.87 (d).</p> <p>WADOC Policy 490.860 section, Section IX.B.1., addresses 115.87 (e).</p> <p>2021 Survey of Sexual Victimization State Prison Systems Summary addresses 115.87 (f).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.87: Data collection.</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.860 Prison Rape Elimination Act Investigation 2. 2022 Annual Report <p>Interviews:</p> <ol style="list-style-type: none"> 1. Agency Head

2. PREA Coordinator
3. PREA Compliance Manager

The following documentation was reviewed: WADOC Policy 490.860 Prison Rape Elimination Act Investigation and the Washington State Department of Corrections Annual PREA Report.

The PREA Coordinator reviews the data, identifies problem areas, identifies the corrective actions taken at the facility level, and prepares a final report. The report assesses the agency's progress in addressing sexual abuse. The Agency Head reviews the report, and it is available online.

The PREA Coordinator indicated that incident-based sexual abuse data statistics are evaluated to identify and assess any patterns. Based on the assessments, adjustments to staff training, incarcerated individual education, the staffing plan, policies, and programming/ operations routines are considered for implementation. No information that identifies victims or perpetrators is included in the report, nor is any information that could threaten an institution's security. If information needs to be redacted, the nature of the redacted material will be indicated.

The PREA Coordinator reports that the documentation is securely maintained at Headquarters. Data is maintained in locked files or computer databases that are user ID and password protected.

The Auditor did review the Annual Report for 2022. The report is available online at <https://www.doc.wa.gov/docs/publications/reports/400-RE004.pdf> . The report captures the Washington State Department of Correction's strategies for establishing a healthy staff and incarcerated individual sexual safety culture, including zero tolerance for sexual abuse and sexual harassment. The Auditor notes that the Annual Report for 2022 is listed on the website as 2021 PREA Annual Report (DOC 2022). The Auditor recommends correctly listing the report as the 2022 PREA Annual Report.

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX A. - D., interviews with the Agency Head, the PREA Coordinator, the PREA Compliance Manager and the 2022 Annual Report address 115.88 (a).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX C. 1. c., and the 2022 Annual Report address 115.88 (b).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX C. 2., interview with the Agency Head, the 2022 Annual Report, and the website <https://www.doc.wa.gov/docs/publications/reports/400-RE004.pdf> addresses 115.88 (c).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX C. 2. a., interview with the PREA Coordinator and the 2022 Annual Report, address 115.88 (d).

The Clallam Bay Corrections Center complies with Standard 115.88: Data review for corrective action.

115.89 Data storage, publication, and destruction

Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents

1. WADOC Policy 280.310 Information Technology Security
2. WADOC Policy 280.515 Data Classification and Sharing
3. WADOC Policy 490.860 Prison Rape Elimination Act Investigation
4. 115.89 OMNI PREA database access
5. 115.89 DOC Records Retention V1.6
6. 2022 Annual Report

Interviews:

1. PREA Coordinator

The following policies were reviewed, WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigation, Policy 280.310 Information Technology Security, and Policy 280.515 Data Classification and Sharing. Additionally, the Auditor reviewed the Washington State Department of Corrections Annual Report.

The following systems are in place to ensure restricted access to all PREA allegations, investigations, and related data within the Washington Department of Corrections.

All allegations are reported via the Incident Management Report System within the Offender Management Network Information system. Access to any Incident Management Report regarding PREA is restricted, confidential, and limited to only those staff who need to know. The agency’s Emergency Operations Administrator reviews access to this system to ensure access is essential to PREA-related responsibilities.

The PREA database within the Offender Management Network Information system is the primary source of information regarding allegations and investigations. Access is restricted to:

- Agency executive administrators
- Appointing Authorities
- Facility staff to include Associate Superintendents, Captains, Human Resources, Shift Commanders, Intelligence and Investigations Chiefs, PREA Compliance Managers, PREA Compliance Specialists and staff designated to manage investigations within the facility.
- Identified Information Technology staff responsible for system maintenance.

All access is reviewed and approved at the Headquarters level to ensure compliance with established restricted access parameters.

	<p>All investigation reports, hotline call recordings, and related allegation information are maintained within an access-restricted drive. Access to that drive is limited to the agency PREA Unit responsible for managing all allegations and maintaining related information. The Annual Agency PREA reports from previous calendar years, including identified agency and facility-level issues and corresponding action/strategic plans, are accessible at https://www.doc.wa.gov/corrections/prea/resources.htm#reports . Reports beginning with the calendar year 2013 are available. The Auditor recommends correctly listing each report with the correct year. As noted in the previous standard, the 2022 Annual Report is listed as the 2021 PREA Annual Report, and the 2021 Annual Report is listed as the 2020 Annual Report etc.</p> <p>The Auditor did not observe any personal identifiers in the statistics reflected on the website.</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section X., Policy 280.310 Information Technology Security, Policy I and section V., Policy 280.515 Data Classification and Sharing, section II., and the interview with the PREA Coordinator, addresses 115.89 (a).</p> <p>The Annual Agency PREA reports from previous calendar years, including identified agency and facility-level issues and corresponding action/strategic plans, are accessible at https://www.doc.wa.gov/corrections/prea/resources.htm#reports addresses 115.89 (b).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX C. 2. a., and the 2022 Annual Report addresses 115.89 (c).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX. B., and the 115.89 DOC Records Retention V1.6 page 37, addresses 115.89 (d).</p> <p>The Clallam Bay Corrections Center complies with Standard 115.89: Data storage, publication, and destruction.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Clallam Bay Corrections Center participated in its first PREA Audit in July 2015. The facility had its second PREA Audit in September 2017. The facility had its third PREA Audit in June 2021. This audit is the facility’s fourth PREA audit.</p> <p>The Auditor was provided access to and observed all facility areas. The Auditor was permitted to request and receive copies of any relevant documents.</p> <p>The Auditor was permitted to conduct private interviews with offenders and staff. The Auditor verified the posting of the audit notifications, housing units and</p>

	<p>common areas accessible to offenders and staff. Through offender interviews, the Auditor verified that offenders were permitted to send confidential correspondence in the same manner as if they were communicating with legal counsel.</p> <p>During the three years, starting on August 20, 2013, and every three years after, the Washington State Department of Corrections has ensured that each facility operated by the agency or by a private organization on behalf of the agency has been audited at least once.</p> <p>The Auditor reviewed the relevant agency-wide policies, Clallam Bay Corrections Center, procedures, reports, internal and external audits, and accreditations for the facility. The Auditor was provided a sampling of relevant documents for the most recent one-year period. The Auditor was permitted access to and observed all areas of the Clallam Bay Corrections Center. The Auditor was permitted to request and receive copies of all relevant documents. The Auditor interviewed staff, supervisors, and administrators. The Auditor was permitted to conduct private interviews with offenders. Offenders were allowed to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel. The Auditor was able to interview community-based victim advocates.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Washington State Department of Corrections publishes PREA Audit Reports for all facilities within the organization on the agency website. The auditor reviewed the Agency's prior PREA Audit Reports.</p> <p>The Clallam Bay Corrections Center participated in its first PREA Audit in July 2015. The facility had its second PREA Audit in September 2017. The facility had its third PREA Audit in June 2021. This audit is the facility's fourth PREA audit. Each report is located on the Agency's website https://www.doc.wa.gov/corrections/prea/resources.htm.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(f)		
	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