

PREA Facility Audit Report: Final

Name of Facility: Monroe Correctional Complex

Facility Type: Prison / Jail

Date Interim Report Submitted: 12/31/2024

Date Final Report Submitted: 04/23/2025

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Robert Palmquist	Date of Signature: 04/23/2025

AUDITOR INFORMATION	
Auditor name:	Palmquist, Robert
Email:	robobem@gmail.com
Start Date of On-Site Audit:	11/18/2024
End Date of On-Site Audit:	11/22/2024

FACILITY INFORMATION	
Facility name:	Monroe Correctional Complex
Facility physical address:	16550 177th Avenue Southeast, Monroe, Washington - 98272
Facility mailing address:	PO Box 777, Monroe,

Primary Contact

Name:	Kari Styles
Email Address:	kastyles@doc1.wa.gov
Telephone Number:	3607942239

Warden/Jail Administrator/Sheriff/Director

Name:	Jack Warner
Email Address:	jkwarner@doc1.wa.gov
Telephone Number:	3607942601

Facility PREA Compliance Manager

Name:	Kari Styles
Email Address:	kastyles@doc1.wa.gov
Telephone Number:	
Name:	Todd Olmsted-Fredrickson
Email Address:	rtolmstedfredrickson@doc1.wa.gov
Telephone Number:	(360) 794-2624

Facility Health Service Administrator On-site

Name:	Rachel Symon, HSM 3
Email Address:	rssymon@doc1.wa.give
Telephone Number:	(360) 794-2808

Facility Characteristics

Designed facility capacity:	2400
Current population of facility:	1492
Average daily population for the past 12 months:	1492

Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Mens/boys
In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of "intersex" and "transgender," please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	18-65
Facility security levels/inmate custody levels:	Minimum, Medium, Close, Maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	1091
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	61
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	312

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

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-11-18
2. End date of the onsite portion of the audit:	2024-11-22

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:	Providence Intervention Center for Assault and Abuse 1509 California St, Inside the Dawson Place Advocacy Center, Everett, WA 98201 Advocate Specialist 425-261-2000

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	2400
15. Average daily population for the past 12 months:	1492
16. Number of inmate/resident/detainee housing units:	15
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	1506
19. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	34
20. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	20
21. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	14
22. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	9
23. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	14
24. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	56

25. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	27
26. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	3
27. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	946
28. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
30. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	1029
31. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	336

32. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	48
33. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	40
35. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<div> <input checked="" type="checkbox"/> Age </div> <div> <input type="checkbox"/> Race </div> <div> <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) </div> <div> <input checked="" type="checkbox"/> Length of time in the facility </div> <div> <input checked="" type="checkbox"/> Housing assignment </div> <div> <input type="checkbox"/> Gender </div> <div> <input type="checkbox"/> Other </div> <div> <input type="checkbox"/> None </div>
36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	<p>Random incarcerated individuals were selected across all housing units. Selections of incarcerated individuals with various custody levels and time in custody.</p> <p>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>

37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="checked" type="radio"/> Yes <input type="radio"/> No
38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	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.
Targeted Inmate/Resident/Detainee Interviews	
39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	26
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	3
41. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1

42. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1
43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1
44. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	2
45. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	5
46. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	8
47. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	3
48. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	2

49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
49. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div> <input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	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.
50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	Twenty six targeted interviews were conducted utilizing eight target categories.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
51. Enter the total number of RANDOM STAFF who were interviewed:	13

52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
53. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
54. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	Random staff interviews were selected across all shifts. A total number of 13 random staff interviews were conducted. Staff interviews were conducted in a private office.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	23
56. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No

58. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
59. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

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

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

☒ Yes

☐ No

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

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

☒ Yes

☐ No

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

☒ Yes

☐ No

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

☒ Yes

☐ No

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

☒ Yes

☐ No

69. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).

During the audit, the Auditor executed comprehensive surveillance of personnel and contractors across all shifts, with an emphasis on residential units, segregation, and areas of programmatic activity such as correctional industries and educational facilities. A primary obligation of the Auditor was the proactive identification of facility blind spots. This necessitated a thorough evaluation of staff sightlines and the implementation of requisite modifications. The principal facility, replete with an extensive array of cameras and mirrors, was suitably equipped. The Auditor observed the supervisory level and frequency of cell inspections in residential areas where confined individuals are housed. The Auditor scrutinized indirect supervision practices, including camera positioning. The Auditor inspected the Master Control area and surveyed cameras across all facility areas. The Auditor did not discern any significant staffing issues, overcrowding, or significantly compromised sightlines. The Auditor engaged in informal dialogues with Unit Officers, Shift Lieutenants, Unit Sergeants, Education staff, medical personnel, and mental health staff. There were no grievances pertaining to staffing shortages or overcrowding. Shift Lieutenants and Sergeants uniformly indicated that they routinely conducted unannounced rounds. Numerous informal discussions were held with incarcerated individuals. There were no significant issues regarding staffing presence or overcrowding. Incarcerated individuals expressed that programming, education, and work opportunities were satisfactory. The Auditor executed a comprehensive observation of areas where incarcerated individuals may be in a state of undress, including but not limited to activities such as showering, utilizing toilet facilities, and changing attire. The scope of the observation encompassed housing units, medical facilities, intake cells, shower areas, transport holding areas, and recreational spaces. The Auditor conducted an assessment to

ascertain if nonmedical personnel of the opposite gender could potentially view confined individuals in a state of undress from various angles, inclusive of mirror placement. The Auditor's observation methodology incorporated multiple perspectives and vantage points, including observations from the floor level and other tiers. The placement and angular orientation of any mirrors present were noted.

The Auditor performed an inspection of electronic surveillance monitoring areas, such as control rooms or other designated spaces where staff monitor live or recorded video feeds of incarcerated individuals. The Auditor determined whether the staff of the opposite gender was assigned to monitor video surveillance, whether the video monitoring technology incorporated point, tilt, and zoom capabilities, and whether the facility employed software or other mechanisms to obscure cross-gender viewing of confined individuals in a state of undress. The Auditor engaged in informal dialogues with staff regarding cross-gender viewing protocols, including staff responsible for monitoring camera feeds. The Auditor also facilitated conversations with incarcerated individuals about their experiences changing clothes, using toilet facilities, and showering without staff of the opposite gender being able to view. Within housing units, the Auditor observed the methods employed to alert incarcerated individuals that a staff person of the opposite gender has entered a housing unit or area where they are likely to be in a state of undress. The Auditor assessed the audibility of the alert for all confined individuals in the housing unit or area, the time interval between the alert and the staff person's arrival, and the adequacy of the alert for individuals with disabilities. Additionally, the Auditor engaged in informal dialogues with staff in housing units regarding knock-and-announce procedures and unannounced rounds conducted by supervisors. The Auditor conducted an examination of the third-party

reporting mechanism by dispatching an electronic mail to the designated address on the Washington State Department of Corrections website (docPREA@doc.wa.gov). The electronic mail received a response within a time frame of less than 24 hours. All procedures were appropriate. The Auditor further tested the third-party telecommunication number (a recorded message was left), and the message elicited a response in less than 24 hours. All procedures were appropriate.

Documentation Sampling

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

70. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?

☒ Yes

☐ No

71. 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.

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	10	7	10	10
Staff-on-inmate sexual abuse	3	1	3	3
Total	13	8	13	13

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	13	0	13	0
Staff-on-inmate sexual harassment	5	0	5	0
Total	18	0	18	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	10	0	0	0	0
Staff-on-inmate sexual abuse	3	0	0	0	0
Total	13	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	10	1	9	0
Staff-on-inmate sexual abuse	3	1	0	2
Total	13	2	9	2

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	13	1	3	9
Staff-on-inmate sexual harassment	5	3	2	0
Total	18	4	5	9

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

13

79. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	10
81. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
82. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	18
87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	13
89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files

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

5

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

☒ Yes

☐ No

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

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

☒ Yes

☐ No

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

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

The Auditor reviewed 31 investigation files.

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

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

☐ Yes

☒ No

Non-certified Support Staff

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

☐ Yes

☒ No

AUDITING ARRANGEMENTS AND COMPENSATION

97. Who paid you to conduct this audit?

☐ The audited facility or its parent agency

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

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

☐ Other

Identify the name of the third-party auditing entity

Corrections Consulting Services

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"> WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting WADOC Policy DOC 490.850, Prison Rape Elimination Act (PREA) Response MCC Operational Memorandum MCC 490.850, Prison Rape Elimination Act (PREA) Response MCC Operational Memorandum MCC 490.800 PREA Prevention and Reporting 115.11 Correctional Operations ORG Chart 2023 115.11 Monroe Correctional Complex Organization Chart 115.11 Position Description Director of PREA Services <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 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 MCC Operational Memorandum MCC 490.850, Prison Rape Elimination Act (PREA) Response. These policies provide the agencies and facility's approaches to preventing, detecting, and responding to sexual abuse and sexual harassment. The policies have 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 Monroe Correctional Complex 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 Monroe Correctional Complex employs a Correctional Programs Manager, who is the designated PREA Compliance Manager. The Correctional Programs Manager oversees the facility's efforts to comply with the PREA Standards. The PREA Compliance Manager is identified in the Monroe Correctional Complex 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 Monroe Correctional Complex 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 Monroe Correctional Complex has a zero-tolerance policy and a 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 Monroe Correctional Complex 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, Monroe Correctional Complex 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 Monroe Correctional Complex.

Monroe Correctional Complex utilizes the following strategies to reduce and prevent sexual abuse and sexual harassment at the facility:

1. Designating a staff member as the Monroe Correctional Complex PREA Compliance Manager, who will ensure that the Monroe Correctional Complex 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 Monroe Correctional Complex can improve its zero-tolerance policy and procedures.
9. Ensuring that the Monroe Correctional Complex 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 Monroe Correctional Complex Organizational Chart. The Auditor conducted a facility tour to evaluate posted information throughout the facility.

Interviews were conducted with the PREA Coordinator, the PREA Compliance Manager, and the Superintendent. The Superintendent supported the efforts of the

	<p>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 MCC Operational Memorandum MCC 490.850, Prison Rape Elimination Act (PREA) Response, address 115.11 (a).</p> <p>The WADOC Correctional Operations Organization Chart, the Monroe Correctional Complex Organization Chart, and the position description for the PREA Coordinator address 115.11 (b).</p> <p>The WADOC Correctional Operations Organization Chart, the Monroe Correctional Complex Organization Chart, and interviews with the PREA Coordinator, the PREA Compliance Manager, and the Superintendent address 115.11 (c).</p> <p>The Monroe Correctional Complex 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
	<p>Auditor Overall Determination: Meets Standard</p>
	<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 115.12 Iowa Contract K10681 115.12 Minnesota Contract CDOP448 115.12 ABHS K10802 115.12 DOJ ruling on Pioneer 8-13 115.12 Secretary memo 09-21-22 PREA <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 with the PREA standards.</p> <p>The Washington State Department of Corrections currently has contracts with multiple agencies for the housing of incarcerated individuals. The contracts require the Washington State Department of Corrections to comply with PREA standards and</p>

allow WADOC to monitor that compliance.

The Washington State Department of Corrections implemented a comprehensive monitoring process during this audit cycle. This includes self-evaluation, on-site visits, and a review of Department of Justice audit results. This thorough approach ensures that the Washington State Department of Corrections actively monitors and maintains compliance with PREA standards.

The following are the entities with which the Washington State Department of Corrections contracts to house individuals and their current monitoring status:

American Behavior Health Systems

- The organization now operates four (4) facilities for residential substance abuse treatment for individuals under supervision in the community. Individuals sanctioned to participate in this residential treatment program who fail to complete the program or violate program rules/specifications may have field supervision violated with incarceration as a sanction for that violation.
- Information about PREA is included in the organization's public website at <https://www.americanbehavioralhealth.net/prea/>. The information includes background, reporting, investigation, annual reports, and audit report information.
- The organization has also completed DOJ audits in the four identified facilities. Final reports documenting 100% compliance have been received and are posted to the organization's public website.

The Washington State Department of Corrections staff visit the facilities and engage in collaborative discussions to address PREA-related issues. This collaborative approach ensures that all stakeholders participate in maintaining compliance.

WADOC has either established or updated interstate compacts with the following agencies since the implementation of the PREA standards:

Iowa – compact amended in 2015.

- The Iowa Department of Corrections has audited each of its nine (9) facilities during each of the previous audit cycles, achieving 100% compliance during each audit. Audit reports are posted to the agency's public website at <https://doc.iowa.gov/administration/prea/prea-audits>. The agency ensures that one-third of its facilities are audited each year, in compliance with PREA standard requirements. Reports for the most recent audits are posted on the agency's public website.

Minnesota – compact amended in 2015.

- The Minnesota Department of Corrections has audited each of its ten (10) facilities, achieving 100% compliance during each audit. Audit reports are

	<p>posted to the agency’s public website at https://mn.gov/doc/about/prea-policy/. The agency ensures that one-third of its facilities are audited each year, in compliance with PREA standard requirements. Reports for the most recent audits are posted on the agency’s public website.</p> <p>The Washington State Department of Corrections Classification and Case Management Administrator monitors the Compact facilities.</p> <p>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 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
	<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 (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. 115.13 2023 MCC Staffing Plan Review - Final 6. 115.13 2024 MCC Staffing Plan Review – Final 7. 115.13 MCC Unit Closures and Phase Two 8. 115.13 MSU B Unit Closures Update 9. 115.13 WSRU A Unit Soft Closure – 3A Open 10. 115.13 MCC Master Walkabout Reports September 2023 – August 2024 11. 115.13 MCC Unannounced Rounds March – April

12. 115.13 MCC Unannounced Rounds September -February
13. 115.13 Custody Staffing Model revised 04-10-2023.
14. 115.13 non-custody staffing Model revised 04-01-2022.
15. 115.13 MCC Site Review

Interviews:

1. PREA Compliance Manager
2. PREA Coordinator
3. Superintendent
4. Intermediate or higher-level staff

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 2023 and 2024, Unannounced Round Logs, and Staffing Models were reviewed. The PREA Compliance Manager, PREA Coordinator, and one Intermediate or Higher-Level staff member were interviewed.

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

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

The PREA Compliance Manager was interviewed regarding staffing levels, staffing reports, and unannounced rounds to determine compliance.

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

Monroe Correctional Complex implements a staffing plan that provides adequate staffing levels. The PREA Compliance Manager, the Superintendent, the Human Resource Manager, the Captain, and a PREA Compliance Specialist review the staffing plan. The facility staffing plan includes a vulnerability analysis that examines 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, weather, and unforeseen maintenance issues.

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 to the conducting of such rounds. The Auditor reviewed the logbooks 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 logbooks covering the periods between September 2023 - August 2024 revealed substantial compliance with 115.1(d). Rounds cover the three shifts; the logs include the supervisor's signature and corresponding dates. Intermediate or higher-level staff indicate they have conducted 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 makes rounds during one of the three daily shifts. (See also MCC Master Walkabout Reports)

During the facility tour, the Auditor's primary focus was to compare the written staffing plan with observations to ensure it adequately addressed the facility's staffing and electronic monitoring needs, with an emphasis on sexual safety. The Auditor verified that the facility was staffed according to the plan and that deviations were properly documented.

Observations concerning 115.13 (a): (5) All components of the facility's physical plant (including "blind spots" or areas where staff or inmates may be isolated).

The facility's physical plant was thoroughly examined to identify any potential "blind spots" or areas where staff or inmates could be isolated, posing a safety risk. The following areas did not meet the required element (5) of the staffing plan:

1. Sex Offender Treatment and Assessment Bathroom requires a curtain across the toileting area to allow individuals privacy while using the bathroom.
2. The R+G 1-4 door requires a window.
3. The R+G 1-14 staff bathroom should be labeled Staff Bathroom and kept locked when not in use.
4. The Motor pool inmate Bathroom requires a door in the window.
5. S-10-48 (Recreation Gym area Sky Rivers Treatment Center) frost the window so that staff may view incarcerated individuals who enter the area, but staff

	<p>cannot view incarcerated individuals urinating or using toileting facilities.</p> <p>Corrective Action Plan: The deficiencies described above require remediation to ensure compliance with the staffing plan and to enhance safety by eliminating potential isolation areas.</p> <p>On January 29, 2025, the Auditor received an email from the Washington Department of Corrections PREA Specialist confirming that the specified doors had been remediated. Attached to the email were photographs showing the completed work. This action addresses the concern with 115.13(a)(5) and is now considered resolved.</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., MCC Site Review, the 2023 MCC Staffing Plan Review, and the 2024 MCC Staffing Plan Review address 115.13 (a)</p> <p>115.13 MCC Unit Closures and Phase Two, 115.13 MSU B Unit Closures Update, 115.13 WSRU A Unit Soft Closure – 3A Open, Custody Staffing Model revised 04-10-2023, and Non-custody Staffing Model revised 04-01-2022 address 115.13 (b).</p> <p>The 2024 MCC Staffing Plan Review and the 2023 MCC 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, Examples of unannounced rounds Logs and MCC Master Walkabout Reports address 115.13(d).</p> <p>The Monroe Correctional Complex complies with Standard 115.13: Supervision and monitoring.</p>
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115.14	Youthful inmates
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<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 Monroe Correctional Complex 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</p>

	<p>transfer to the appropriate reception center would immediately be requested.</p> <p>The Monroe Correctional Complex complies with Standard 115.14 – Youthful Offenders.</p>
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115.15	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Documents:</p> <ol style="list-style-type: none"> 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 Introduction to Pat Searches PPT 7. 115.15 CWC Strip Searches of Incarcerated Individuals Facilitators Guide 8. 115.15 DOC Transgender Searches – AIS FY 24 9. 115.15 Deputy Secretary Memorandum 10. 115.15 DOC Pat Search – Transgender Search MCC Training Database 11. 115.15 IMRS Cross Gender Search documentation 12. 115.15 Staff Guidance on Incarcerated Gender-Specific Searches and Scans Memorandum 13. MCC Site Review <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Staff 2. Random Incarcerated Individual 3. Transgender Incarcerated Individual <p>The PRE-Audit Questionnaire denotes that cross-gender strip or visual body cavity searches are only conducted under exigent circumstances. Strip searches involving male offenders necessitate the presence of at least one male employee. If a female employee is the second person conducting the strip search, she positions herself to observe the conducting employee, ensuring she is not in direct line of sight with the offender. The gender of the search officers is recorded in the strip search log. According to the PRE-Audit Questionnaire, four cross-gender strip searches or cross-gender body cavity searches were conducted at Monroe Correctional Complex during the audit period. These searches were documented according to the established</p>

procedures.

The PREA Compliance Manager reports that the Monroe Correctional Complex 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.

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 non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. This includes viewing via 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 the shift. Distribution will include the Prison Rape Elimination Act (PREA) Coordinator.

According to section 115.15 (d), the facility is mandated to implement procedures to ensure that inmates can shower, perform bodily functions, and change clothing without the risk of being viewed by non-medical staff of the opposite gender. The Close Observation areas do not meet the requirements of 115.15(d). The following correction action is required:

Digital Blocking or Blurring:

Install digital blocking or blurring technology in all cells within the specified Close Observation areas to obscure the toilet area. Specifically, the Fourth Floor Hospital (Washington State Reformatory), Close Observation area (Sky River Treatment Center), Close Observation area (overflow) (Sky River Treatment Center). Ensure each cell has effective digital blocking or blurring in place. Provide digital photographs of the cell interior from the camera view of each cell, clearly identifying the cell number and the specific location of the cell, i.e., Close Observation area (4th Floor Hospital), Close Observation area (overflow), and Close Observation area.

Provide these photographs to the Auditor as evidence of compliance.

This plan ensures that all requirements of PREA Standard 115.15(d) are met, protecting inmate privacy and maintaining the integrity of the facility's operations.

On December 18 and December 30, 2024, the Auditor received an email from the Agency PREA Coordinator stating that the toilet areas in each cell identified have had digital blocking applied. The facility staff provided digital pictures of each cell

indicating the toilet areas have been digitally blocked from the camera view. This action satisfies 115.15 (d). (See Sky Rivers Treatment Center COA Cells, Sky Rivers Treatment Center COA Cells and Washington State Reformatory COA Cells

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.

Audit Findings on Staff Announcements and Doorbell Functionality 115.15(d).

The Auditor conducted an extensive evaluation to ensure compliance with the facility's protocols regarding staff announcements and the functionality of doorbells in housing units. A total of 43 random interviews were carried out with incarcerated individuals to gain insight into these practices.

The results of the interviews revealed areas for improvement:

Out of the forty-three interviewed, thirteen incarcerated individuals (30%) reported that female staff sometimes or never announce their presence when entering a housing unit. This lack of consistency in announcements compromises the integrity of the housing unit's environment and the comfort of its residents. The Auditor observed that doorbells were installed at the entrance of each housing unit tier. These doorbells function correctly. Only one doorbell failed to function, and that doorbell was immediately fixed.

The Auditor recommends the Superintendent issue a memo to all staff emphasizing the requirement that anyone who does not identify with the housing unit's gender designation announce their presence when entering. This recommendation aims to standardize the practice across the facility to ensure a respectful and predictable environment. The purpose and use of the doorbells will be communicated to the staff to ensure they are utilized effectively. The Superintendent will instruct staff of the opposite gender to announce their presence using a verbal announcement or the doorbell when entering a housing unit.

This recommendation aims to rectify the identified discrepancies, thereby fostering a more compliant and respectful environment for all incarcerated individuals.

On December 20, 2024, the Superintendent issued a memorandum to all staff stating the following:

This memorandum serves as a reminder and provides guidance for when opposite gender announcements are required in housing units.

Unit: The entire housing unit to include the living area, offices, foyers, dayrooms, etc.

Living Area: Those areas within the unit where incarcerated individuals live (pod, wing, bays, etc.)

- 1. Staff assigned to the unit: Per the Department of Justice, announcing only one time at the beginning of shift is not sufficient to meet the intent of the standard. When each person of the opposite gender of those housed in the unit enters the living area, an announcement will be made at the start of shift but also "often enough" throughout the shift, taking into account the time of the day, how long since the last time they entered the living areas, etc. Announcements will be made every time upon entering any bathroom areas.*
- 2. Staff not assigned to the unit: When each person of the opposite gender of those housed in the unit enters the living area, an announcement is required. Repeated announcements are only required if the individual exits and reenters the unit.*
- 3. In-Patient Infirmaries: In-patient infirmaries are considered a living area and staff are required to announce, per statements 1 and 2. Announcements are not required by medical and mental health practitioners.*

The PRE-Audit Questionnaire delineates that the staff of Monroe Correctional Complex are prohibited from conducting searches or physical examinations of transgender/intersex offenders to ascertain their genital status. The PREA Compliance Manager affirms that no such examinations were conducted during the audit period. All thirteen randomly selected staff interviewees corroborated that the facility prohibits staff from conducting searches or physical examinations of transgender/intersex offenders to ascertain their genital status.

The Auditor executed a comprehensive observation of areas where incarcerated individuals may be in a state of undress, including but not limited to activities such as showering, utilizing toilet facilities, and changing attire. The scope of the observation encompassed housing units, medical facilities, intake cells, shower areas, transport holding areas, and recreational spaces.

The Auditor conducted an assessment to ascertain if nonmedical personnel of the opposite gender could potentially view confined individuals in a state of undress from various angles, inclusive of mirror placement. The Auditor's observation methodology incorporated multiple perspectives and vantage points, including observations from the floor level and other tiers. The placement and angular orientation of any mirrors present were noted.

The Auditor performed an inspection of electronic surveillance monitoring areas, such as control rooms or other designated spaces where staff monitor live or recorded video feeds of incarcerated individuals. The Auditor determined whether the staff of the opposite gender was assigned to monitor video surveillance, whether the video

monitoring technology incorporated point, tilt, and zoom capabilities, and whether the facility employed software or other mechanisms to obscure cross-gender viewing of confined individuals in a state of undress.

The Auditor engaged in informal dialogues with staff regarding cross-gender viewing protocols, including staff responsible for monitoring camera feeds. The Auditor also facilitated conversations with incarcerated individuals about their experiences changing clothes, using toilet facilities, and showering without staff of the opposite gender being able to view.

Within housing units, the Auditor observed the methods employed to alert incarcerated individuals that a staff person of the opposite gender has entered a housing unit or area where they are likely to be in a state of undress. The Auditor assessed the audibility of the alert for all confined individuals in the housing unit or area, the time interval between the alert and the staff person's arrival, and the adequacy of the alert for individuals with disabilities.

Additionally, the Auditor engaged in informal dialogues with staff in housing units regarding knock-and-announce procedures and unannounced rounds conducted by supervisors.

WADOC Policy 420.310 Searches of Offenders Section, III.D.F., WADOC Policy 420.312, Section, II.B., III, 115.15 Deputy Secretary Memorandum, 115.15 Staff Guidance on Incarcerated Individual Gender-Specific Searches and Scans Memorandum, 115.15 IMRS Cross Gender Search documentation, and MCC Site Review, address 115.15(a).

WADOC Policy 420.310 Searches of Offenders, Section II. Routine Searches A-E and Random Staff interviews, address 115.15(b).

WADOC Policy 420.310 Searches of Offenders, section III, A-H, WADOC Policy 420.312 Body Cavity Search, section III A-F, 115.15 Cross Gender Search documentation and MCC Site Review address 115.15(c).

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, Random Staff Interviews, Random Incarcerated Individual Interviews, Sky Rivers Treatment Center COA Cells, Sky Rivers Treatment Center COA Cells overflow and Washington State Reformatory COA Cells, Superintendent Memorandum PREA Standard 115.15 (d), and MCC Site Review, address 115.15(d).

WADOC Policy DOC 490.700, Transgender, Intersex and/or Non-Binary Housing and Supervision, Section IX, E, Random staff Interviews and Transgender Incarcerated Individual Interviews, address 115.15 (e).

115.15 DOC Transgender Searches - AIS FY 24, 115.15 CWC Introduction to Pat Searches PPT, 115.15 CWC Strip Searches of Incarcerated Individuals Facilitators Guide, 115.15 DOC Pat Search - Transgender Search -MCC Training Database, addresses 115.15(f).

The Monroe Correctional Complex complies with Standard 115.15: Limits to cross-

	gender viewing and searches.
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 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 In Person Interpreter Services 6. 115.16 Language Link 7. 115.16 Notice of Rights for Individuals with Disabilities 8. 115.16 Prison Spanish Brochure 9. 115.16 Spanish Statewide Orientation Manual 10. 115.16 Unauthorized Use of Interpreter Services 11. 115.16 Deaf Services Coordinator position description 12. 115.16 Language Logs 13. 115.16 PREA Prison Poster Spanish 14. 115.16 Sign Language Contract Interpreter List 15. 115.16 Various contracts with a variety of interpretation services <p>Interviews:</p> <ol style="list-style-type: none"> 1. Agency Head 2. LEP Incarcerated Individuals 3. Random Staff <p>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 Sign Language Contract Interpreter List, 115.16 Notice of Rights for Individuals with Disabilities, 115.16 Deaf Services Coordinator position description C765 PD, 115.16 In-Person Interpreter Services, various interpreter contracts, 115.16 PREA Prison Poster Spanish, 115.16 Prison Spanish Brochure, 115.16 Spanish Statewide Orientation Manual, Language Logs and 115.16 Unauthorized Use of Interpreter Services.</p>

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 materials to all offenders, with PREA information being a critical component of this process. The material is presented in a clear and understandable manner. The department has provisions for offenders with various impairments:

- Deaf or Hard of Hearing: Written materials and American Sign Language contractors.
- Blind or Low Vision: A video where PREA information is read aloud.
- One-to-One Discussions: Available for all offenders, including those with intellectual disabilities (with housing unit counselors) and those with psychiatric disabilities (with mental health and medical staff offering individualized treatment).
- Speech Disabilities: Onsite counselors and educators available for discussion of PREA-specific questions.
- Other Impairments: Any exceptional communication difficulties are referred to the PREA Compliance Manager.

These measures ensure that all offenders receive the necessary PREA information in a way that meets their individual needs.

The Auditor reviewed samples of PREA Posters in both English and Spanish. These PREA Posters were 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 having trouble 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 reviewed the PREA Brochure. 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 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 PREA Coordinator 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.

In addition to written and visual education materials, the Monroe Correctional Complex has agreements with interpreters to provide effective communication with offenders who do not understand English. The Monroe Correctional Complex 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.*

The Auditor tested the accessibility of Language Link, an interpretation service utilized by staff if a Certified interpreter is not available. The phone number and the dialing instructions were provided to the Auditor (115.16 Language Link). The Auditor experienced no issues contacting the Language Link service. The Auditor interviewed two individuals who presented as Limited English Proficient. One interview was conducted in English. One interview required the use of the Language Link service. No significant issues were encountered during these interviews.

WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, WADOC Policy 450.500 Language Services for Limited English Proficient Individuals,

	<p>WADOC Policy 690.400 Individuals with Disabilities, WADOC Policy 310.000 Orientation, 115.16 Sign Language Contract Interpreter List, 115.16 Notice of Rights for Individuals with Disabilities, 15.16 Deaf Services Coordinator position description, Agency Head Interview and Limited English Proficient Incarcerated Individual Interviews, addresses 115.16(a).</p> <p>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, various contracts for Interpretation Services, 115.16 PREA Prison Poster Spanish, 115.16 Prison Spanish Brochure, 115.16 Spanish Statewide Orientation Manual, Limited English Proficient Incarcerated Individual Interviews, and Language Logs, address 115.16(b).</p> <p>The Monroe Correctional Complex does not utilize offender interpreters. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, section III A. 1., WADOC Policy 450.500 Language Services for Limited English Proficient Individuals, Directive I.D., E., II.A.1., B, III.C., D., Limited English Proficient Incarcerated Individual Interviews, Random Staff Interviews and 115.16 Unauthorized Use of Interpreter Services, addresses 115.16(c).</p> <p>The Monroe Correctional Complex complies with Standard 115.16: Incarcerated Individuals with Disabilities and Incarcerated Individuals with limited English proficiency.</p>
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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. 115.17 Contractors 2024 Background Checks – PREA Training 6. 115.17 Staff Tracker with Background Checks 7. 115.17 HR Hires Promotion Spreadsheet 8. 115.17 DOC 03-068 9. 115.17 DOC 03-506 Samples 10. 115.17 DOC 05-370 Samples 11. Contractors 2024 Background Checks-PREA Training Database 12. MCC Employee Record Worksheet 13. Contract Staff initial training acknowledgement for 03-478 Samples

14. Contractor Worksheets Monroe Correctional Complex

15. Volunteer Worksheets Monroe Correctional Complex

Interviews:

Human Resources staff.

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:

- 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.

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 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 that 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.

As noted in the Pre-Audit Questionnaire, 109 people hired in the past 12 months may have contact with offenders who have had criminal background record checks. The Auditor reviewed two new employee hire files, and 13 employee files. Criminal background checks were completed.

Background checks are completed every five years for current employees. The

Auditor reviewed the data for tracking employees' background investigations.

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.

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 are disqualified from employment.

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 sanctions or conditions that may affect their fitness for duty or the agency's program may be subject to disciplinary action, including dismissal.

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.

WADOC Policy 810.800 Recruitment, selection and promotion, Section II.A.2, WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section, I.A.2., DOC 03-506 samples and 115.17 Staff Tracker with Background dates, address 115.17(a).

WADOC Policy 810.800 Recruitment, selection, and promotion Section, II.A.3., Employee Record Worksheets and interview with Human Resources staff, address 115.17(b).

WADOC Policy 810.800 Recruitment, Selection and Promotion section, II.A.2. & 4, WADOC Policy 810.015 Criminal Record disclosure and fingerprinting, DOC 05-370 Samples, and interview with Human Resources staff, address 115.17 (c).

115.17(d)

The agency shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates.

The PRE-Audit Questionnaire provided inadequate information concerning criminal background checks for contractors. During the audit, there was excessive confusion concerning the process for ensuring background checks were being completed on contractors. Two contractors were interviewed during the audit. Both indicated they had received training and that background checks had been completed.

Unfortunately, the background check for one of the contractors could not be located until after the completion of the on-site portion of the audit. Additionally, the facility provided an updated list of Contractors that included background check information as well as PREA Training information. This updated list contained information on fifty-one contractors. The PRE-Audit Questionnaire provided DOC 05-370 forms on ten contractors. Of those ten contractors, seven do not appear on the updated list of Contractors provided during the on-site portion of the audit.

The Auditor is not satisfied that background checks are being performed on Contractors. Based on the evidence provided the Monroe Correctional Complex does not maintain accurate records of background checks for contractors.

Corrective Action for 115.17 (d).

This action plan applies to the Monroe Correctional Complex and its processes for performing and documenting criminal background checks for contractors.

Compile an accurate and comprehensive list of all contractors currently working at the Monroe Correctional Complex. This list must include:

1. Date of hire
2. Date of initial background check
3. Date of most recent background check
4. Date of initial PREA Training

5. Date of most recent PREA Training

Submit the compiled list to the Auditor for review.

The Auditor will randomly select ten contractors from this list and request documentation that verifies:

1. Date of initial background check
2. Date of most recent background check
3. Date of initial PREA Training
4. Date of most recent PREA Training

Develop and implement a robust system to ensure that all contractors entering the Monroe Correctional Complex have completed necessary background checks and PREA Training.

The system must include:

1. Procedures for conducting and documenting criminal background checks before enlisting contractor services.
2. Procedures to ensure all contractors complete initial and ongoing PREA Training.
3. Methods for maintaining and updating accurate records of all background checks and PREA Training for contractors.

Provide written documentation detailing the system of checks and procedures developed to ensure compliance with PREA Standard 115.17(d).

Ensure records are maintained accurately and are readily accessible for audit and review purposes.

Corrective Action Plan Update:

On March 10, 2025, Monroe Correctional Complex staff sent a completed list of contractors at the facility that included and included Date of hire, Date of initial background check, Date of most recent background check, Date of initial PREA Training, and Date of most recent PREA Training. From this list the Auditor selected 10 contractors, and verified, the Date of initial background check, the Date of most recent background check, the Date of initial PREA Training and the Date of most recent PREA. On March 20, 2025, Monroe Correctional Complex staff provided a memo to all staff. This memo defines which department is responsible for specific badges at the facility, who is responsible for background checks, and training. This memorandum clarifies the issue of which department is responsible for individuals entering the facility.

Blue Badge (DOC Employees)

- **Background Checks:** All new and rehired employees undergo criminal background checks conducted by DOC Human Resources. Armed employees are checked annually, while unarmed employees are checked every five years, in accordance with DOC regulations and the Prison Rape Elimination Act.
- **Training Requirements:** All DOC employees must complete New Employee Orientation, which includes an overview of the Prison Rape Elimination Act and sign a PREA acknowledgment. They are also required to complete a course on preventing sexual abuse and harassment.

Yellow Badge (Contract Staff)

- **Background Checks:** The MCC Records Manager conducts criminal background checks for all contract staff every five years, as required by DOC regulations and the Prison Rape Elimination Act. Any criminal background check that results in a “hit” is immediately sent to HR for review by the Appointing Authority.
- **Training Requirements:** Contract staff must complete New Employee Orientation, which includes an overview of the Prison Rape Elimination Act and sign a PREA acknowledgment. They are also required to complete a course on preventing sexual abuse and harassment.

Red Badge (Volunteers)

- **Background Checks:** All new and subsequent criminal background checks for volunteers are completed by the Community Partnership Program Coordinator every five years, as required by DOC regulations and the Prison Rape Elimination Act.
- **Training Requirements:** Volunteers must complete PREA training located on the public DOC website before accessing the population. They also complete the New Employee Orientation conducted at the facility and sign a PREA acknowledgment.

The PREA Coordinator for the Washington State Department of Corrections clarified the discrepancy in the initial number of contractors reported and the actual number of contractors currently working at Monroe Correctional Complex and provided an updated database with corresponding notes to clarify the discrepancies.

It is anticipated this corrective action plan will assist the facility in maintaining accurate records of individuals entering the facility. The auditor is satisfied that the Corrective Action Plan is complete.

WADOC Policy 810.800 Recruitment, Selection and Promotion Section, II.A.2. & 4, WADOC Policy 810.015 Criminal Record Disclosure and Fingerprinting, Contractors 2024 Background Checks-PREA Training Database, Contract Staff initial training acknowledgement for 03-478 Samples, Contractor Worksheets Monroe Correctional

	<p>Complex, Volunteer Worksheets Monroe Correctional Complex and interview with Human Resources staff, address 115.17 (d).</p> <p>WADOC Policy 810.800 Recruitment, Selection and Promotion Section, II.A.2. & 4, WADOC Policy 810.015 Criminal Record Disclosure and Fingerprinting, DOC 05-370 Samples, 115.17 Staff Tracker with Background Checks, Employee Record Worksheets, and interview with Human Resources staff, address 115.17 (e).</p> <p>Sexual Misconduct and Institutional Employment/ Service Disclosure form DOC 03-506, WADOC Policy 810.800 Recruitment, selection, and promotion Section, II.A.2, DOC 03-506 samples, Employee Record Worksheets and interview with Human Resources staff address 115.17 (f).</p> <p>Sexual Misconduct and Institutional Employment/ Service Disclosure form DOC 03-506, WADOC Policy 810.800 Recruitment, selection, and promotion Section, II.A.2, DOC 03-506 samples, Employee Record Worksheets and interview with Human Resources staff address 115.17 (g).</p> <p>WADOC Release of Information Document (DOC 03-068) and interview with Human Resources staff addresses 115.17 (h).</p> <p>The Monroe Correctional Complex complies with Standard 115.17: Hiring and promotion decisions.</p>
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115.18	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p>
	<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 2. Memorandum 115.18 Cameras and Mirrors <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 1. Agency Head 2. Superintendent <p>In the process of planning significant expansions or modifications to existing facilities, the Washington State Department of Corrections engages the services of a consultant with specialized expertise in the design of correctional facilities, ensuring adherence to offender and staff safety protocols. The agency issues comprehensive instructions to the consultants, which are derived from approved program and pre-design</p>

	<p>documents. These documents incorporate WADOC policies, standards, guidelines, and specifications, inclusive of the Prison Rape Elimination Act (PREA).</p> <p>The Agency Head has affirmed that the Washington State Department of Corrections takes into account the implications of facility modifications or expansions on the institution's capacity to protect offenders from sexual abuse. It is noted that PREA guidelines are integral to the design of new facilities. The Agency Head has also indicated that technology enhancements play a pivotal role in bolstering the Agency's capabilities to safeguard against sexual abuse. According to the Agency Head, all substantiated and unsubstantiated instances of offender sexual abuse are reviewed to ascertain whether modifications to facility design or technological upgrades would mitigate the likelihood of recurrence.</p> <p>During the on-site phase of the audit, the Auditor conducted an interview with the Superintendent. The Superintendent confirmed that, in the course of planning any expansions or modifications to existing facilities, the potential impact on the facility's capacity to protect offenders from sexual abuse is a paramount consideration. Despite several adjustments to building usage, housing utilization, and camera configurations, no significant expansions or modifications have been undertaken at the Monroe Correctional Complex since the previous PREA Audit. Nonetheless, the Auditor has observed that the PREA Compliance Manager and the PREA Compliance Specialist are actively engaged in all facets of the changes concerning building usage, housing utilization, and camera configurations.</p> <p>During the on-site inspection of the facility, the Auditor observed the presence of convex mirrors in housing areas, maintenance areas, and other parts of the facility. The Auditor notes that the Monroe Correctional Complex is equipped with one hundred security mirrors strategically placed to address blind spots and augment the facility's video surveillance system.</p> <p>The facility currently operates a total of 2500 cameras utilizing the Genetec Security Desk software system.</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 Monroe Correctional Complex since the last PREA audit.</p> <p>The Monroe Correctional Complex 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

Documents:

1. 490.800 PREA Prevention and Reporting
2. 490.850 PREA Response
3. 490.860 PREA Investigation
4. 600.000 Health Services Management
5. 600.025 Health Care Copayment Program
6. 610.025 Health Services Management of Alleged Sexual Misconduct Cases
7. 115.21 RCW 7.68.170
8. 115.21 WAC 137-28-190
9. 115.21 Uniform Evidence Protocol
10. 115.21 Forensic Medical Exam Procedure for DOC Health Care Staff
11. 115.21 OCVA-JDI Support Poster English and Spanish
12. 115.21 PREA Designated Advocates and hospitals
13. 115.21 Advocate Selection
14. 115.21 Advocate Training Requirements
15. 115.21 Forensic Medical Exam Procedures – Transport Staff Procedures
16. 115.21 K8487 Washington State Patrol MOU
17. 115.21 K1194 OCVA Amendment Contract
18. 115.21 LE Meeting Minutes 3-29-2023
19. 115.21 LE Meeting Minutes 4-25-2024
20. 115.21 List of Forensic Medical Examinations
21. 115.21 Memo from Health Services Asst. Secretary
22. 115.21 National Protocol for Sexual Assault Medical Examinations Adults/Adolescents
23. 115.21 OCVA Brochures English and Spanish
24. 115.21 OCVAS-JDI Support Poster English
25. 115.21 Recommendations for Administrators of Prison, Jails and Community Confinement Facilities
26. 115.21 Sexual Assault Evidence Collection Uniform Evidence Protocol
27. 115.21 Webinar Transcript in-person advocacy

Interviews:

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

The Auditor reviewed 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. Administrative investigations are conducted by specially trained Washington State Department of Corrections staff. The Monroe Police Department conducts criminal investigations. If the Monroe Police Department declines to

investigate, the facility can make a referral to the Washington State Patrol.

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 Monroe Correctional Complex provides all victims of sexual abuse access to forensic medical examinations at Providence Regional Medical Center, Everett in Everett, Washington. Providence Regional Medical Center provides comprehensive treatment for sexual assault victims through collaboration between the hospital, law enforcement agencies, forensic nurse specialists and sexual assault counseling advocates (Providence Intervention Center for Assault and Abuse (PICAA). 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 four Monroe Correctional Complex offenders have participated in a forensic examination in the past 12 months. All four individuals were provided with Forensic exams at Providence Regional Medical Center. Upon return to the facility, all individuals received follow-up care. (See 115.21 List Forensic Medical Examinations)

The Washington State Department of Corrections has instituted 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 Monroe Correctional Complex is the Providence Intervention Center for Assault and Abuse, as noted in the PREA Designated Advocates documentation. 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 an incident of sexual assault, sexual abuse, or staff sexual misconduct, the alleged victim is entitled to legal advocacy support. During the course of any investigation, an advocate is made available to accompany the alleged victim during interviews with investigators. The Shift Commander maintains a contact list, identifying the PREA Compliance Manager and the PREA Compliance Specialist as the designated points of contact to coordinate the presence of advocates at interviews.

The Providence Intervention Center for Assault and Abuse provides a range of services, including crisis intervention, needs assessment, referral to additional resources, and medical and legal advocacy. The medical and legal advocacy framework encompasses various tasks and functions, such as accompaniment to medical forensic examinations, explanation of the exam proceedings, and advocacy on behalf of the victim/survivor to assert their choices regarding aspects of the exam and treatment. The center offers presence and support for incarcerated individuals who have undergone a sexual assault forensic medical exam, as well as during investigatory interviews, depositions, and other legal proceedings. Additionally, the center advocates provide accompaniment, support, and information during any resulting criminal or civil proceedings.

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 Monroe Police Department is the primary investigator for a crime committed within Monroe Correctional Complex. If the local agency refuses to investigate, the facility can make a referral to the Washington State Patrol. The Washington State Patrol 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 the Monroe Correctional Complex for conducting investigations in general.

WADOC 610.025 Health Services Management of Alleged Sexual Misconduct Cases, WADOC 490.860 Prison Rape Elimination Act Investigation, WADOC 490.850 Prison Rape Elimination Act Response, 115.21 Uniform Evidence Protocol, 115.21 Forensic Medical Exam Procedures – Transport Staff Procedures, 115.21 Forensic Medical Exam Procedure for DOC Health Care Staff, 115.21 National Protocol for Sexual Assault Medical Examinations Adults/Adolescents, 115.21 National Protocol Recommendations for Administrators of Prison, Jails and Community Confinement Facilities, and interviews with Random Staff, address 115.21 (a).

115.21 National Protocol for Sexual Assault Medical Examinations Adults/Adolescents, and 115.21 National Protocol Recommendations for Administrators of Prison, Jails and Community Confinement Facilities, address 115.21 (b).

WADOC 610.025 Health Services Management of Alleged Sexual Misconduct Cases, Policy I, II.A.1.a, WADOC 490.850, Prison Rape Elimination Act Response III.B.4., 115.21 24-23670, 115.21 24-24138 and 115.21 RCW 7.68.170, address 115.21 (c).

WADOC Policy 490.800, XI A-F, MOU with the Office of Crime Victims Advocacy (K11494 OCVA), 115.21 Advocate Training Requirements, 115.21 OCVA Brochures English and Spanish, 115.21 OCVA-JDI Support Poster English, 115.21 webinar transcript in-person advocacy, interview with PREA Compliance Manager and Incarcerated Individuals who reported sexual abuse, address 115.21 (d).

WADOC Policy 490.800, XI A-F, Office of Crime Victims Advocacy (K11494 OCVA), 115.21 Advocate Training Requirements, 115.21 OCVA Brochures English and Spanish, 115.21 OCVA-JDI Support Poster English, 115.21 webinar transcript in-person advocacy, interview with PREA Compliance Manager and Incarcerated Individuals who reported sexual abuse, address 115.21(e).

WADOC 490.860 Prison Rape Elimination Act Investigation, Directive: I. Investigations A.-O., 115.21 K8487 WSP MOU, and Law Enforcement Meeting 2023 and 2024, address 115.21 (f).

The Monroe Correctional Complex 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
	<p>Documents:</p> <ol style="list-style-type: none"> 1. 490.800 Prison Rape Elimination Act Prevention and Reporting 2. 490.860 Prison Rape Elimination Action Investigation 3. 115.22 Law Enforcement Referral Logs 4. 115.22 Law Enforcement Meeting 2024 5. 115.22 Law Enforcement Meeting 2023 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Agency Head 2. Investigator <p>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.</p> <p>The investigators and the Agency Head assured the Auditor that all sexual abuse or harassment allegations were investigated.</p> <p>As reported in the Pre-Audit Questionnaire, 410 allegations of sexual abuse and sexual harassment were received in the past 12 months. One Hundred and ninety allegations resulted in an administrative investigation, and eight allegations were referred for criminal investigation.</p> <p>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 data collected provides the basis for the PREA Annual Reports.</p> <p>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 the Washington State Patrol for assistance as needed/requested. Each Superintendent meets with local law</p>

	<p>enforcement officials annually to discuss investigation processes and review procedures.</p> <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. (https://doc.wa.gov/corrections/prea/resources.htm).</p> <p>The Monroe Correctional Complex holds annual meetings with the Monroe Police Department to delineate investigatory needs, standards, and expectations. The Auditor reviewed the meeting minutes for March 2023 and April 2024.</p> <p>WADOC 490.800 Prison Rape Elimination Act Prevention and Reporting, Section IV, 490.860 Prison Rape Elimination Act Investigation, Policy I.& II Directive I. A. 3., and interview with the Agency Head address 115.22 (a).</p> <p>WADOC 490.860, Prison Rape Elimination Act Investigation Policy I.B., I.A.3, 115.22 Law Enforcement Referral Logs, 115.22 Law Enforcement Meeting 2024, 115.22 Law Enforcement Meeting 2023, 115.22 K8487 WSP MOU, Policy 490.800 Prison Rape Elimination Act Prevention and Reporting and 490.860 Prison Rape Elimination Act Investigations are on the Agency website. (https://doc.wa.gov/corrections/prea/resources.htm), and interview with Investigators, address 115.22 (b).</p> <p>WADOC 490.860, Prison Rape Elimination Act Investigation Policy I.B., I.A.3, 115.22 Law Enforcement Referral Logs, 115.22 Law Enforcement Meeting 2023, and 115.22 Law Enforcement Meeting 2024 address 115.22 (c).</p> <p>The Monroe Correctional Complex 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 Staff Training Transcripts Samples 3. 115.31 AIS DOC Training PREA Preventing Sexual Harassment and Sexual Abuse Prisons 4. 115.31 AIS DOC Training Transgender Cultural Fluency 5. 115.31 PREA Coordinator Explanatory Memorandum 6. 115.31 Staff Tracker PREA Training sorted by Hire Date

7. Employee Record Worksheets

Interviews conducted with:

1. Random Staff

The following policy and other documentation were reviewed: WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, the PREA Coordinator Explanatory Memorandum and various training records. The Auditor reviewed 115.31 AIS DOC Training PREA Preventing Sexual Harassment and Sexual Abuse Prisons, 115.31 AIS DOC Training Transgender Cultural Fluency and the staff training reports for 2024. Interviews were conducted with thirteen random staff.

The Monroe Correctional Complex 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 from sexual abuse and retaliation for reporting sexual abuse and harassment incidents. Employees are trained in 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. 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 Monroe Correctional Complex's current sexual abuse and sexual harassment policies and standard operating procedures. The Monroe Correctional Complex documents that employees understand the training they have received. The Auditor reviewed 25 Employee Training records, each file contained PREA Training Dates.

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 "Yes or No" to the following statements.

- *I verify that I have reviewed and understand all sections of this Prison Rape Elimination Act (PREA) course.*
- *I acknowledge and understand that I have a continuing affirmative duty to disclose and immediately report to my Appointing Authority my involvement in any form of sexual abuse or sexual harassment. Therefore, I confirm the following: I have not knowingly engaged in sexual abuse or sexual harassment with an incarcerated individual under the Department of Corrections jurisdiction.*
- *I have not engaged in any incident of sexual abuse or sexual harassment not addressed above.*
- *I have not engaged in sexual abuse in a prison/jail/lockup/community confinement/juvenile or other institution (e.g., facility for mentally ill, disabled, chronically ill, or handicapped; residential care or treatment facility for juveniles; facility that provides skilled nursing, intermediate or long-term care, or custodial or residential care).*
- *I have never been convicted of or otherwise found (e.g., civilly, administratively) to have engaged or attempted to engage in sexual abuse/assault in any setting.*
- *All answers and statements are true and complete to the best of my knowledge. I understand that untruthful answers or deliberate omissions may be cause for disciplinary action (for employees) or termination of services (for contract staff or volunteers).*

The PREA Coordinator receives a report from the Training and Development Unit if any employee answers no to these statements. If a “no” answer is provided, the appropriate Supervisor is notified. The Supervisor must review the information with the individual to resolve the potential conflict. If the “no” response was in error, the individual is required to retake the Learning Center segment.

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.

WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, section X.B., 115.31 AIS DOC Training PREA Preventing Sexual Harassment and Sexual Abuse Prisons, 115.31 AIS DOC Training Transgender Cultural Fluency, 115.31 Staff Training Transcripts Samples, 115.31 Staff Tracker PREA Training and Random Staff interviews, address 115.31(a).

115.31 AIS DOC Training PREA Preventing Sexual Harassment and Sexual Abuse Prisons, 115.31 Staff Training Transcripts Samples, 115.31 Staff Tracker PREA Training and MCC Employee Record Worksheets address 115.31(b).

WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, section X.B, 115.31 AIS DOC Training PREA Preventing Sexual Harassment and Sexual Abuse Prisons, 115.31 Staff Training Transcripts Samples, 115.31 Staff Tracker PREA Training and MCC Employee Record Worksheets addresses 115.31(c).

	<p>115.31 AIS DOC Training PREA Preventing Sexual Harassment and Sexual Abuse Prisons, 115.31 Staff Training Transcripts Samples, 115.31 Staff Tracker PREA Training, MCC Employee Record Worksheets and 115.31 PREA Coordinator Explanatory memorandum, address 115.31(d).</p> <p>The Monroe Correctional Complex complies with Standard 115.31: Employee training.</p>
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115.32	Volunteer and contractor training
	<p>Auditor Overall Determination: Meets Standard</p>
	<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 2. WADOC Policy 530.100 Volunteer Program 3. 115.32 Brochure staff, contractors, volunteers 4. 115.32 03-478 Vendors and Services Providers Samples 5. 115.32 Contractors 2024 Background Checks – PREA Training 6. 115.32 PREA Coordinator Explanatory Memo 7. 115.32 Training Transcripts – Contractors samples 8. 115.32 Training Transcripts Volunteers samples 9. 115.32 Volunteer Program Schedules samples 10. 115.32 Volunteer – PREA Training <p>Interviews:</p> <ol style="list-style-type: none"> 1. Contractors <p>The Auditor reviewed the training material and the documentation each contractor or volunteer must complete. Monroe Correctional Complex 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 has 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>The Washington State Department of Corrections requires that all contractors with regular contact with offenders complete the same PREA training provided to employees.</p> <p>The level and type of training provided to individuals is based on the services they provide and their contact with incarcerated individuals. Vendors/service providers who have limited unescorted contact with incarcerated individuals must complete form 03-478, PREA Acknowledgement, which includes information on the agency's zero-tolerance policy. In addition, they are provided with the PREA brochure for staff, contractors, and volunteers. Typically, vendors/service providers are those filling vending machines, repairing office equipment, cleaning kitchen equipment, delivering supplies, or performing short-term services in maintenance.</p> <p>Interviews with two Contractors revealed that Contractors are provided with in-person and online training. The Contractors indicated that there is a test upon completion of the training, and the training emphasizes the Washington State Department of Corrections' Zero-Tolerance policy toward sexual harassment and abuse. Interviewees stated they are required to report anything suspicious to the Shift Commander and document the incident.</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, 115.32 Brochure staff, contractors, volunteers, 115.32 Volunteer PREA Training, 115.32 Volunteer Program Schedules Samples, 115.32 Contractors 2024 Background Checks -PREA Training, 115.32 03-0478 Vendor and Services Providers samples, 115.32 Training Transcripts Contractors Samples, 115.32 Training Transcripts Volunteer Samples, address 115.32(a).</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, 115.32 Brochure Staff, Contractors, Volunteers, 115.32 Training Transcripts Volunteer Samples, 115.32 Training Transcripts Contractors Samples, 115.32 03-0478 Vendor and Services Providers samples and interviews with Contractors, address 115.32(b).</p> <p>115.32 Training Transcripts Volunteer Samples, 115.32 Training Transcripts Contractors Samples, 115.32 03-0478 Vendor and Services Providers samples, and 115.32 PREA Coordinator Explanatory Memo address 115.32 (c).</p> <p>The Monroe Correctional Complex complies with Standard 115.32: Volunteer and contractor training.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Documents:

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 PREA Brochure English and Spanish
5. 115.33 PREA Posters English and Spanish
6. 115.33 Individual Comics All
7. 115.33 Low comp Facilitator guide
8. 115.33 Master MCC PRA and Orientation Tracking September 2023 – August 2024
9. 115.33 Orientation for Inmates at MCC prior 2012
10. 115.33 PREA orientation script English and Spanish
11. 115.33 Statewide Orientation Handbook Spanish
12. 115.33 Statewide Orientation Handbook English
13. MCC Incarcerated Individual Records Worksheet
14. MCC Site Review

Interviews

1. Incarcerated Individuals

The Auditor reviewed the following documentation: WADOC Policy 310.000 Orientation, WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, various posters and brochures, and the Statewide Orientation Handbook. Interviews were conducted with intake staff, and incarcerated individuals.

During the on-site tour of the facility, the following observations were made: 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 and 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 Monroe Correctional Complex 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).

Staff interviews verify that offenders receive the appropriate information. In addition to this information, incarcerated individuals are provided with 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, orientation completion documentation is entered as a certificate in the Offender Management Network Information (OMNI) system.

The Auditor notes that each individual is provided with PREA information upon arrival at the Washington Corrections Center. The Washington Corrections Center is the reception center for all male incarcerated individuals sentenced to serve a term of confinement in Washington State. Each individual must view the Washington State Department of Corrections PREA Video during Orientation at the Washington State Corrections Center. The Auditor notes that each incarcerated individual is provided information about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. Additionally, comprehensive education is provided to each incarcerated individual during the assessment process at the Washington Corrections Center. Washington Corrections Center staff document the initial orientation and comprehensive education electronically.

Upon arrival at their designated facilities, each individual is provided education to the extent that the policies and procedures of their new facility differ from those of the Washington Corrections Center.

There are five separate operating facilities at the Monroe Correctional Complex, 1. Washington State Reformatory, 2. Twin Rivers Unit, 3. Sky River Treatment Center, 4. Minimum Security Unit and 5. Intensive Management Unit. Individuals are received at

each operating facility. There is no general place where all individuals are received into the Complex. Each separate operating facility has its own receiving area.

Upon arrival at their designated facility, the individuals are called by name to enter the strip-out area, which is divided into distinct sections separated by curtains. A comprehensive strip search is conducted for each individual by a team typically comprising one Sergeant and two Officers. One Officer assumes the role of observer while the other conducts the search. All search activities are documented in the Strip Search Logbooks.

Post-search, individuals are furnished with appropriate attire. Each individual is provided with a copy of the Monroe Correctional Complex Handbook, which encompasses pertinent information regarding the Prison Rape Elimination Act (PREA). A medical screening is conducted for each individual by the designated medical staff. The entire intake process typically spans a duration of two to three hours. Post-screening, individuals are directed to their respective assigned Units.

Upon arrival at their assigned Units, individuals undergo a PREA Risk Assessment and are allocated to an appropriate cell based on the information gleaned from the PREA Risk Assessment conducted at Monroe Correctional Complex facilities.

Each incarcerated individual is provided 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 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 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 PREA Coordinator 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.

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 Monroe Correctional Complex 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 tested the Language Link contact information during the on-site visit. There were no issues. The Auditor also utilized the Language Link service for one interview with a Limited English-proficient individual. There were no issues utilizing this service. The Auditor also utilized an American Sign Language interpreter for one interview with a deaf individual. There were no issues utilizing this service.

The Auditor also reviewed a random sample of offender files. Each file contained documentation to support an offender’s initial intake at the Washington Corrections Center, and the information concerning PREA that was provided at the Monroe Correctional Complex. During the random interviews, 39 offenders indicated they had received information concerning PREA, four indicated they had not received any information concerning PREA.

The PREA Compliance Manager reports that 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, 115.33 PREA orientation script English and Spanish, 115.33 PREA Posters English – Spanish, 115.33 PREA Brochure English and Spanish, and Random incarcerated individual interviews, address 115.33(a).

MCC Incarcerated Individual Records Worksheet, MCC Site Review, and Random Incarcerated individual interviews address 115.33 (b).

115.33 Orientation for Inmates at MCC prior 2012, 115.33 Master MCC PRA and Orientation Tracking September 2023 – august 2024, MCC Incarcerated Individual Records Worksheet, and MCC Site Review, address 115.33 (c).

115.33 (d)

Of the seven incarcerated individuals qualified for sign language interpreting services at the Monroe Correctional Complex, four did not receive American Sign Language assistance during their orientation.

1. Incarcerated Individual 422689, received ASL at WCC but not at MCC
2. Incarcerated Individual 420711, received closed captioning video at WCC, did not receive ASL at MCC.
3. Incarcerated Individual 384760 did not receive ASL at MCC, unknown orientation at WCC.
4. Incarcerated Individual 410385 declined to sign the orientation paperwork there is no indication he received ASL assistance during orientation.

Corrective Action Plan:

The PREA Compliance Manager shall provide comprehensive education to the above listed individuals regarding their rights to be free from sexual abuse and sexual

harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. This comprehensive education shall be provided with the assistance of an American Sign Language interpreter. Upon completion, provide documentation to the Auditor, utilizing form DOC 21-992 indicating the accommodation and the name of the Interpreter.

Additionally, the PREA Compliance Manager will ensure records are accurately kept reflecting that these individuals have received comprehensive education with the assistance of an ASL interpreter.

On December 31, 2024, Orientation for all four individuals was completed utilizing ASL interpreters. The documentation was provided to the Auditor and uploaded to the Online Auditing System.

Finally, the PREA Compliance Manager shall implement a system to identify and track incarcerated individuals qualified for ASL interpreting services and that future incidents requiring the use of American Sign Language interpreters are documented appropriately.

On February 19, 2025, the following guidelines were provided to staff.

- *Each Incarcerated Individual who arrives on the incoming transport must be scheduled for orientation within 30 days of arrival. This orientation includes not only facility specific information but an update to the Prison Rape Elimination Act to include local procedures. Classification Counselors are meeting with these individuals within 72 hours of arrival. Through this discussion, classification staff should be verifying if the newly arrived individual requires accommodation as stated above. If applicable, the Classification Counselor shall notify the MCC PREA office for tracking purposes as well as the assigned facility CPM's office. The Assigned facility C PM's office will be responsible for making the appropriate arrangements for orientation (i.e.: sign language interpreter, language line assistance, etc.). During orientation, the incarcerated individual is required to review the orientation acknowledgement form and sign if they choose. If accommodation is utilized, the Orientation facilitator must fill out the accommodation section of the Orientation form (21-992) prior to signing and submit the form to the appropriate CPM's office for processing.*

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, WADOC 450.500 Language Services for LEP Individuals, 115.33 PREA orientation script English and Spanish, 115.33 PREA Posters English – Spanish, 115.33 PREA Brochure English and Spanish, 115.33 Statewide Orientation Handbook Spanish, 115.33 Statewide Orientation Handbook English and MCC Site Review addresses 115.33 (d)

MCC Incarcerated Individual Records Worksheet, 115.33 Master MCC PRA and Orientation Tracking September 2023 – august 2024, and MCC Site Review address 115.33 (e).

	<p>115.33 PREA Posters English – Spanish, 115.33 PREA Brochure English and Spanish, 115.33 Statewide Orientation Handbook Spanish, 115.33 Statewide Orientation Handbook English, and MCC Site Review addresses 115.33(f).</p> <p>The Monroe Correctional Complex complies with Standard 115.33: Resident education.</p>
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115.34	Specialized training: Investigations
	<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 880.100 Corrections Training and Development 4. 115.34 Students PP Administrative Investigations 5. 115.34 VIG 1 Introduction to Investigations 6. 115.34 VIG 2 Introduction to Investigations 7. 115.34 VIG 3 Investigative Interviews 8. 115.34 VIG 4 How to write a clear, concise Investigative Report 9. 115.34 VIG 5 After the Report 10. 115.34 Investigator Training Samples 11. MCC Investigator Training Database <p>Interviews:</p> <ol style="list-style-type: none"> 1. Investigators <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 information fundamental to understanding the concepts required by PREA standard 115.34.</p> <p>An interview was conducted with two Investigators for the Monroe Correctional Complex.</p> <p>The Monroe Correctional Complex conducts administrative investigations involving</p>

sexual abuse and sexual harassment. The investigators have received training in conducting investigations in confinement settings. The training included 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 Investigators were aware of their responsibilities during an investigation; they indicated that the investigation would begin immediately upon notification of an allegation. Any allegation that potentially involves criminal behavior would require either the Monroe Police Department or the Washington State Patrol's involvement. The training they took covered all areas of the investigative process, interviewing techniques, evidence collection, evidence protection, 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 investigators stated they would review memorandums, collect as much data as possible, and draft 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 investigators 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 investigators indicated they 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 they 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. The 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

	<p>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, 2018, and requires officers assigned to regularly investigate sexual assault involving adult victims to 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, 115.34 Students PP Administrative Investigations, 115.34 VIG 1 Introduction to Investigations, 115.34 VIG 2 Introduction to Investigations, 115.34 VIG 3 Investigative Interviews, 115.34 VIG 4 How to write a clear concise Investigative Report, 115.34 VIG 5 After the Report, 115.34 Investigator Training Record Samples and interviews with Investigators, address 115.34(a).</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act Prevention and Reporting, Section X, H, 115.34 Students PP Administrative Investigations, 115.34 VIG 1 Introduction to Investigations, 115.34 VIG 2 Introduction to Investigations, 115.34 VIG 3 Investigative Interviews, 115.34 VIG 4 How to write a clear concise Investigative Report, 115.34 VIG 5 After the Report, 115.34 Investigator Training Record Samples and interviews with Investigators, address 115.34 (b)</p> <p>115.34 Investigator Training Record Samples and interviews with Investigators address 115.34 (c).</p> <p>The Monroe Correctional Complex complies with Standard 115.34: Specialized Training: Investigations.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<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
5. 115.35 Health Services Training transcripts samples

Interviews conducted with

1. Medical Staff
2. Mental Health Staff

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 mental health and medical staff received specialized training. Interviews were conducted with Mental Health and Medical staff.

The Monroe Correctional Complex 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.

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 were provided with training. Interviews with the Mental Health staff and Medical Staff confirmed the practice.

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 Providence Regional Medical Center Everett. The facility's medical staff have not received training in conducting forensic examinations.

WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section, X.B and G, WADOC Policy 610.025 Health Services Management of Alleged Sexual Assault Misconduct Cases, 115.35 PREA For Health Services, 115.35 Health Services Training transcripts samples and interviews with Medical and Mental Health Staff address 115.35(a).

WADOC Policy 610.025 Health Services Management of Alleged Sexual Assault Misconduct Cases, pages 1-7, and the Pre-Audit Questionnaire indicating the Monroe Correctional Complex medical staff do not conduct Forensic Evaluations (confirmed

	<p>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 115.35 Health Services Training transcripts samples, addresses 115.35(c).</p> <p>WADOC Policy DOC 490.800 Prison Rape Elimination Act (PREA) Prevention and Reporting, Section, X.B and G, 115.35 PREA For Health Services, 115.35 Health Services Training transcripts samples, (training records confirmed that mental health and medical staff received specialized training and annual refresher PREA Training), and interviews with Medical and Mental Health staff, address 115.35 (d).</p> <p>The Monroe Correctional Complex 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
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<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 For Cause PRA Sample Documentation 5. 115.41 Form 07-019 PRA Blank 6. 115.41 Initial movement and PRA History Samples 7. 115.41 PRA Assessors Guide 8. 115.41 Master MCC PRA and Orientation Tracking September 2023 - August 2024 9. 115.41 PREA Coordinator Explanatory Memo 10. 115.41 Security Groups access to PRA Information 11. MCC Incarcerated Individual Worksheets <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. PREA Compliance Manager 3. Staff who conduct screening for risk of victimization and abusiveness 4. Random Incarcerated Individual interviews <p>The following policies were reviewed: WADOC Policy DOC 490.820 Prison Rape Elimination Act Risk Assessments and Assignments, 280.310 Information Technology</p>

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, the PREA Coordinator, the PREA Compliance Manager and Incarcerated Individuals.

All incarcerated individuals are provided with PREA Risk Assessments within 72 hours of arrival at the Monroe Correctional Complex. The PREA Risk Assessment is conducted privately by a staff member trained in conducting PREA Risk Assessments.

The PREA Risk Assessment procedure 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 incarcerated individuals specifically to reduce incidents of sexual assault and abuse at the Monroe Correctional Complex. 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 incarcerated individual, and any other reliable sources. The source(s) of the information is documented. All PREA Risk Assessments must be completed in person with the incarcerated individual.

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

If an incarcerated individual is released, 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 incarcerated individual between Washington State Department of Corrections facilities.

The data presented in 115.41 Master MCC PRA and Orientation Tracking September 2023 - August 2024 indicates that a total of 2059 individuals arrived at MCC between September 2023 and August 2024. Initial risk assessments were completed within the three-day period for 1994 of those incarcerated individuals for a 97% completion rate.

A Follow-Up PREA Risk Assessment will be completed between 21 and 30 calendar

days after the incarcerated individual's arrival at any facility to incorporate any additional information received suggesting potential for victimization or predation. When meeting with the incarcerated individual, the counselor has the option to ask the incarcerated individual if anything has changed from the previous assessment rather than asking the offender all the individual assessment questions.

The data presented in 115.41 Master MCC PRA and Orientation Tracking September 2023 - August 2024 indicates that a total of 1001 individuals were at the facility for 30 days or more. Follow-up risk assessments were completed within the 21 - 30-day period for 990 of those incarcerated individuals for 98% completion rate.

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 incarcerated individual'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 observe 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 incarcerated individual in several areas, including mental health and physical health, age, physical build, previous incarcerations, criminal history, prior sex offenses, whether the incarcerated individual is or is perceived to be gay, lesbian, bisexual, transgender, intersex or gender non-conforming, prior sexual victimization and the incarcerated individual'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 incarcerated individuals identified as vulnerable to sexual abuse or harassment or at elevated risk of being sexually abusive are referred to Mental Health for appropriate follow-up and/or assessment. The Auditor interviewed two staff members who conduct risk assessments. The staff members were aware of their responsibilities in conducting risk assessments.

Random incarcerated individual interviewees assert when they first came to the Monroe Correctional Complex, 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 Monroe Correctional Complex. 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, 115.41 Initial movement and PRA History Samples, MCC Document Review Worksheet Inmate Records, the interviews 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 interviews with Staff who conduct screening for risk of victimization and abusiveness, 115.41 Master MCC PRA and Orientation Tracking September 2023 – August 2024, 115.41 Initial movement and PRA History Samples, MCC Document Review Worksheet Inmate Records and interviews with random incarcerated individuals addresses the requirements of 115.41(b).

WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section I.B.1, 115.41 PRA Assessors Guide, 115.41 07-019 PRA Blank, addresses 115.41 (c).

WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 A-F, the interviews with Staff who conduct screening for risk of victimization and abusiveness, 115.41 PRA Assessors Guide, 115.41 07-019 PRA Blank, addresses 115.41 (d).

WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 A-F, 115.41 07-019 PRA Blank Form, 115.41 PRA Assessors Guide, and the interviews with Staff who conduct screening for risk of victimization and abusiveness, addresses 115.41 (e).

WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 C, the interviews with Staff who conduct screening for risk of

	<p>victimization and abusiveness, interviews with random incarcerated individuals, 115.41 Initial movement and PRA History Samples, 115.41 Master MCC PRA and Orientation Tracking September 2023 – August 2024, MCC Document Review Worksheet Inmate Records addresses 115.41 (f).</p> <p>WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 D the interviews with Staff who conduct screening for risk of victimization and abusiveness, interviews with random incarcerated individuals and 115.41 For Cause PRA Sample Documentation (samples) addresses 115.41 (g).</p> <p>WADOC Policy 490.820 Prison Rape Elimination Act Risk assessments and assignments, Section 1 E. 2., interviews with Staff who conduct screening for risk of victimization and abusiveness, address 115.41 (h).</p> <p>115.41 PREA Coordinator Explanatory Memorandum, interviews with the PREA Coordinator, PREA Compliance Manager and Staff who conduct screening for risk victimization and abusiveness, and 115.41 security groups access to PRA Information addresses 115.41 (i).</p> <p>The Monroe Correctional Complex 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. WADOC Policy 700.000 Work Programs in Prison 5. 115.42 02-384 Housing Protocol for Transgender – Non-Binary Samples 6. 115.42 02-385 Housing Review for Transgender Non-Binary samples 7. 115.42 02-385 Housing Review Transgender Blank form 8. 115.42 02-423 Gender Affirming Housing Review samples. 9. 115.42 Housing Chronos samples 10. 115.42 incoming transport job screening samples 11. 115.42 PRA Housing Guide 2019 12. 115.42 List of Transgender Non-Binary Individuals <p>Interviews conducted with:</p>

1. PREA Coordinator
2. PREA Compliance Manager
3. Staff who conduct risk assessments
4. Transgender Interviews Monroe Correctional Complex
5. Gay Incarcerated Individuals Monroe Correctional Complex

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, Policy 700.000 Work Programs in Prison 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, Transgender and Gay incarcerated individuals 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 abuse. The policy indicates that information gathered through 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 abuse. 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 PREA Risk Assessment has been completed at the Monroe Correctional Complex (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 protocols for Transgender, Intersex, and Non-Binary Individuals. These documents indicate constant monitoring of available information to ensure the appropriate placement of each offender. Formal and informal incarcerated individual 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 protocol process also considers management or security problems resulting from placement options. 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, 115.42 Housing Chronos samples, 115.42 PRA Housing Guide 2019, 115.42 115.42 incoming transport job screening samples, 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 Housing Chronos samples, 115.42 incoming transport job screening samples, and interviews with staff who conduct Risk Screening, addresses 115.42 (b).

WADOC Policy 490.700 Transgender, Intersex, and Non-Binary Housing and Supervision, sections II-VI, 115.42 List of Transgender Non-Binary, 115.42 Housing Chronos samples, 115.42 02-423 Gender-Affirming Housing Request samples, 115.42 02-384 Housing Review Transgender Blank form, 115.42 02-384 Housing Protocol for Transgender – Non-Binary Samples, 115.42 02-385 Housing Review for Transgender Non-Binary samples, 115.42 02-423 Gender Affirming Housing Review samples, 115.42 PRA Housing Guide 2019, interviews with the PREA Compliance Manager and Transgender Interviews Monroe Correctional Complex address 115.42 (c).

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

	<p>section V., 115.42 02-385 Housing Review for Transgender Non Binary Samples, 115.42 02-385 Housing Review Transgender Blank form, 115.42 02-384 Housing Protocol for Transgender – Non-Binary Samples, 115.42 02-423 Gender Affirming Housing Review samples, 115.42 PRA Housing Guide 2019, 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-VII, (see specifically VII. A-C), 115.42 PRA Housing Guide 2019, interviews with the PREA Compliance Manager, staff responsible for Risk Screening, and Transgender Interviews Monroe Correctional Complex address 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, Transgender Interviews Monroe Correctional Complex, Gay Incarcerated Individuals Monroe Correctional Complex, 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, PREA Compliance Manager, Transgender Interviews Monroe Correctional Complex and Gay Incarcerated Individuals Monroe Correctional Complex address 115.42 (g).</p> <p>The Monroe Correctional Complex complies with 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 490.850 Prison Rape Elimination Act Response 2. WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and Assignments 3. WADOC Policy 320.255 Restrictive Housing 4. WADOC Policy 320.200 Administrative Segregation <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 1. Superintendent 2. 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 490.850 Prison Rape Elimination Act Response, Policy 320.255 Restrictive Housing and Policy 320.200 Administrative</p>

Segregation.

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 is not 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.

The Superintendent indicated placement in involuntary segregation for offenders at risk of sexual victimization at the Monroe Correctional Complex would only occur if no suitable alternative housing exists and would last until arrangements could be made for placement in another Unit. The Superintendent further stated that housing offenders at risk for sexual victimization is managed with consideration for their safety. He expressed that the movement of the individual at risk for sexual victimization to involuntary segregation would be utilized as the last alternative.

The Monroe Correctional Complex 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 Assignments section, VI. D., and interviews with the Superintendent and Staff Supervising Incarcerated Individuals in Segregated Housing address 115.43 (c).

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).

WADOC Policy 490.820 Prison Rape Elimination Act Risk Assessments and

	<p>Assignments section, VI. D., and the interview with Staff Supervising Incarcerated Individuals in Segregated Housing address 115.43 (e).</p> <p>The Monroe Correctional Complex 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 Brochure staff contractors volunteers 5. 115.51 K10506 Colorado MOU 6. 115.51 Statewide Orientation Handbook Excerpt 7. 115.51 ADA Compliance Manager memo 09-21-2022 8. 115.51 Colorado Reporting Log 09-01-23 to 8-31-24 9. 115.51 excerpt from 2022 Annual PREA Report 10. 115.51 Miscellaneous reports samples 11. 115.51 PREA Poster English 12. 115.51 Prison English Brochure 13. 115.51 WAC 137-48-020 14. 115.51 DOC Preventing Sexual Harassment and Sexual Abuse in Prison 15. MCC 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 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)</p>

Interviews were conducted with random staff, incarcerated individuals and the PREA Compliance Managers.

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.

The Auditor noted that the facility's signage was clear and easy to understand. Signs in English and Spanish provided information about emotional support services and reporting mechanisms. The posters were accessible to individuals with disabilities. The PREA Hotline and Office of Crime Victim Advocacy numbers are posted in the housing units, recreation yards, education, food service, correctional industries and medical.

The Auditor tested the third-party reporting by emailing docPREA@doc.wa.gov, as listed on the Washington State Department of Corrections website. The email received a response in less than 24 hours, and all appropriate procedures were adhered to. The Auditor tested the third-party phone number by leaving a recorded message, which received a response within 24 hours, with all procedures being followed appropriately.

The Auditor engaged with multiple incarcerated individuals regarding their ability to access staff and the Kiosk system. No impediments were reported; all individuals who furnished information indicated an absence of issues in accessing the Kiosk system or staff members. The Auditor solicited an incarcerated individual to utilize the Kiosk system and demonstrate the feasibility of accessing information for the purpose of sending an email. No complications were observed.

The Auditor contacted the Office of Crime Victim Advocacy during the facility tour.

The Office of Crime Victim Advocacy responded to the Auditor by correctly identifying the Community Sexual Assault Program that collaborated with incarcerated individuals at Monroe Correctional Complex. (Providence Intervention Center for Assault and Abuse). The Auditor contacted Just Detention International, which indicated no reports of sexual abuse or harassment have been received at Just Detention International concerning Monroe Correctional Complex.

Incarcerated Individuals have multiple ways to report allegations of sexual abuse and sexual harassment at the Monroe Correctional Complex; 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 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, available in the PREA information provided to incarcerated individuals, and reviewed with the incarcerated individuals during intake. Incarcerated Individual interviews confirm knowledge of the reporting procedures.

The Mail Room Staff make daily trips to the Monroe Post Office to both deliver and retrieve mail. The collected mail is sorted at the Post Office, placed in a designated area, and subsequently picked up by the Mail Room Staff. All general mail, legal mail, books, and packages are subject to X-ray screening. Suspicious items, including greeting cards, mail on colored or blank paper, are copied. The original mail item is retained in the Mail Room for a duration of 30 days. Should the recipient wish to keep the original, it is returned to the sender at the recipient's expense. After the 30-day period, if there has been no communication from the recipient, the original mail is destroyed.

Each piece of mail undergoes screening and content scanning. For individuals monitored by the Intelligence Unit (IIU), their mail is forwarded to IIU for review before being returned to the Mail Room for distribution. Mail requiring a signature or notary is not copied, and legal mail is exempt from copying procedures.

Each unit is provided with a mailbag, where the unit's mail is placed and delivered by 2:00 PM daily, Monday through Friday. There is no mail distribution on weekends. The unit's Counselor receives the mail and posts a roster listing the names of individuals

who have received mail. After dinner, the Unit Officer conducts a mail call where individuals collect their mail upon identifying themselves.

Legal mail is separated with care. If a piece of legal mail appears suspicious, Mail Room Staff will verify its authenticity by contacting the sending organization. The legal mail is then placed in the unit mailbag. Upon arrival in the unit, a Counselor collects the legal mail, informs the recipient, opens the mail in their presence, scans it for contraband, and then delivers it. Both the recipient and the staff member sign the logbook to acknowledge the receipt of the legal mail.

Mail is collected from each unit during the first shift and delivered to the Mail Room. Outgoing mail is scanned, reviewed for content, sealed by the Mail Room Staff, and delivered to the United States Postal Service (USPS) daily. Each unit has a mailbox for outgoing mail.

Staff reporting requirements are addressed in WADOC Policy 490.850 Prison Rape Elimination Act Response Section, I.A. and E. and Attachment 2. (See also 115.51 DOC Preventing Sexual Harassment and Sexual Abuse in Prison, sections 5.25 – 5.29).

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.

According to provision 115.51(b), agencies must provide inmates with a means to report abuse or harassment to an external entity that can forward reports to agency officials while allowing anonymity if requested. The Washington State Department of Corrections complies with this by enabling individuals to send reports to the Colorado Department of Corrections using the DOC 21-379 PREA Allegation form, available in accessible areas of the facility with pre-addressed envelopes.

However, during an on-site visit, the Auditor observed inconsistencies in the availability of these forms and envelopes across various housing units:

- Some units had forms but no envelopes.
- Some units had envelopes but had no forms.
- Some units had no forms, or they were provided to the individual upon entering the unit however there was no method to ensure the individuals actually received the forms.

115.51(b): Action Plan:

- Establish a universal process for distributing form DOC 21-379 and pre-addressed envelopes that maintain confidentiality and anonymity. The forms should be in the same designated area in each housing unit. In units where

individuals have restricted access, develop a system to ensure each individual receives a form and is instructed as to the method of obtaining additional forms.

It is imperative to implement a robust system to verify the daily availability of these forms and envelopes. This system will provide the necessary oversight and accountability to ensure that the forms and envelopes are always accessible to the inmates.

Corrective Action Plan update: Documentation was received by the Auditor on March 25, 2025, indicating the following: DOC 21-379, Report of Prison Rape Elimination Act (PREA) Allegation to an Outside Agency Form (21- 379) is available for print through the iDOC forms page and/or through each facility CPM's office or area where forms are stored for distribution. The corresponding envelopes are available through each facility CPM's Office of where forms are stored for distribution.

Each living unit is responsible for ensuring that these forms and envelopes are always available for Incarcerated Individuals in an area that is accessible.

- MCC-TRU: Living Unit Form Distribution Center located in the active dayroom.
- MCC-MSU: Living Unit Form Distribution Center located in the hallways
- MCC-WSRU: Living Unit Distribution Center located in the active dayrooms
- MCC-SRTC: Living Unit Form Distribution Center located in the active dayroom.
- Restrictive Housing: DOC 21-379 and pre-addressed envelope will be placed in the intake bags. Any additional forms can be made available upon request.
- MCC-IMU: DOC 21-379 and pre-addressed envelopes will be available on the tiers with open movement (i.e. progression, transfer and violator pods). For all other tiers, the form and envelope will be placed in the intake bags. Any additional forms can be made available upon request.

The Correction Action plan is completed.

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., 115.51 WAC 137-48-020, 115.51 PREA Poster English, 115.51 Prison English Brochure, 115.51 Statewide Orientation Handbook Excerpt, Interviews with Random Staff, Incarcerated Individuals and the MCC Site Review address 115.51 (a).

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section XIII. B. 3. e., 115.51 Colorado Reporting Log 09-01-23 to 8-31-24, 115.51 ADA Compliance Manager memo 09-21-2022, 115.51 K10506 Colorado MOU, MCC Site Review, interviews with the PREA Compliance Manager and Incarcerated Individuals, 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, volunteers, 115.51 excerpt from 2023 Annual PREA Report, 115.51 Miscellaneous report samples, 115.51 DOC

	<p>Preventing Sexual Harassment and Sexual Abuse in Prison sections 5.25 – 5.29, interviews with Random Staff and Incarcerated Individuals address 115.51(c).</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act Response, Section 1. A. and E and Attachment 2, 115.51 Brochure staff contractors, volunteers, 115.51 DOC Preventing Sexual Harassment and Sexual Abuse in Prison sections 5.25 – 5.29, and Interviews with Random Staff address 115.51 (d).</p> <p>The Monroe Correctional Complex complies with Standard 115.51: Incarcerated Individual Reporting.</p>
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115.52	Exhaustion of administrative remedies
	<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 550.100 Resolution Program 3. 115.52 Resolution Program Manual English 4. 115.52 Resolution Program Manual Spanish 5. 115.52 PREA Coordinator Explanatory Memorandum 6. 115.52 Secretary Memorandum <p>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.</p> <p>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.</p> <p>The Washington State Department of Corrections provides for PREA allegations</p>

	<p>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.</p> <p>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.</p> <p>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 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
	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. 115.53 Excerpt of the Statewide Offender Handbook - English and Spanish 3. 115.53 OCVA Brochures English and Spanish 4. 115.53 OCVA-JDI-support-Poster English 5. 115.53 OCVA-JDI-support-Poster Spanish 6. 115.53 PREA Coordinator Explanatory Memo 7. 115.53 policy glossary excerpt 01-04-21 8. 115.53 K11494 OCVA MASTER 9. 115.53 PREA-family-friends-brochure-Spanish 10. 115.53 PREA-family-friends-Poster Spanish 11. 115.53 MCC Providence Victim advocate Meeting 2024 12. MCC Site Review <p>Interviews</p>

1. Random Incarcerated Individuals
2. Individuals who Reported Sexual Abuse
3. Community Advocate Providence Intervention Center

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.

Interviews were conducted with random incarcerated individuals and incarcerated individuals who reported sexual abuse.

The Auditor reviewed the information provided to incarcerated individuals concerning the Office of Crime Victim Advocacy, and Just Detention International. 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. The Auditor noted that the facility's signage was clear and easy to understand. Signs in English and Spanish provided information about emotional support services and reporting mechanisms. The posters were accessible to individuals with disabilities.

The Auditor contacted the Office of Crime Victim Advocacy during the facility tour. The Office of Crime Victim Advocacy responded to the Auditor by correctly identifying the Community Sexual Assault Program that collaborated with incarcerated individuals at Monroe Correctional Complex. (Providence Intervention Center for Assault and Abuse). The Auditor contacted Just Detention International, which indicated no reports of sexual abuse or harassment have been received at Just Detention International concerning Monroe Correctional Complex.

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 needs, 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 Monroe Correctional Complex, the Community Sexual Assault Program is Providence Intervention Center for Assault and Abuse.

The Monroe Correctional Complex 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 the Providence Intervention Center for Assault and Abuse. 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 conducted an interview with an Advocate Specialist from the Providence Intervention Center for Assault and Abuse. The Specialist affirmed that the organization provides assistance to victims at the facility. The Specialist also indicated that the Victim Advocates at the Providence Intervention Center for Assault and Abuse have undergone Sexual Assault Advocacy Training. This training encompasses the detection and assessment of signs of sexual abuse and harassment, effective and professional responses to victims, and the reporting protocols for allegations or suspicions of such incidents.

The Specialist stated that at the commencement of services to an offender, PICAA staff members disclose the limitations of confidentiality and their duty to report. Additionally, victims of sexual abuse are ensured timely and unimpeded access to emergency medical treatment and crisis intervention services, with the nature and scope of these services determined by the professional judgment of the Sexual Assault Nurse Examiner (SANE) and Advocacy staff. Follow-up services are provided as necessary, ensuring that the level of care is consistent with community standards.

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section XI, A -G, 115.53 Excerpt of the Statewide Offender Handbook - English and Spanish, 115.53 OCVA Brochures English and Spanish, 115.53 OCVA-JDI-support-Poster English and Spanish, 115.53 policy glossary excerpt 01-04-21, MCC Site Review, Interviews with Random Incarcerated Individuals, 115.53 K11494 OCVA Master, address the requirements of 115.53 (a).

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, Section XI, F., 115.53 K11494 OCVA Master, 115.53 PREA Coordinator Explanatory Memo, interviews with random incarcerated individuals, interviews with incarcerated individuals who reported sexual abuse and, 115.53 excerpt of the Statewide Offender Handbook - English and Spanish, addresses 115.53 (b).

115.53 K11494 OCVA MASTER, 115.53 MCC Providence Victim advocate Meeting 2024, and the Interview with the Community Advocate Providence Intervention

	<p>Center, address 115.53 (c).</p> <p>The Monroe Correctional Complex complies with Standard 115.53: Incarcerated Individual Access to outside confidential support services.</p>
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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. MCC Site Review <p>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. The Auditor reviewed the PREA Friends and Family brochure.</p> <p>The Auditor reviewed the information provided to incarcerated individuals concerning the Office of Crime Victim Advocacy, and Just Detention International. 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. The Auditor noted that the facility's signage was clear and easy to understand. Signs in English and Spanish provided information about emotional support services and reporting mechanisms. The posters were accessible to individuals with disabilities.</p> <p>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.</p> <p>The Monroe Correctional Complex 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</p>

	<p>(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.</p> <p>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 MCC Site Review address 115.54 (a).</p> <p>The Monroe Correctional Complex complies with Standard 115.54: Third-party reporting.</p>
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115.61	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.850 Prison Rape Elimination Act Response 2. WADOC Policy 350.550 Reporting Abuse and Neglect Mandatory Reporting 3. 115.61 K10912 APS (Adult Protective Services) Interagency agreement 4. 115.61 PREA Coordinator Explanatory Memorandum 5. 115.61 RCW 74.34.020 6. 115.61 DOC Preventing Sexual Harassment and Sexual Abuse in Prison Section 5.25 – 5.29 <p>Interviews:</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Superintendent 3. Medical Staff 4. Mental Health Staff 5. Random Staff <p>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 115.61 K10912 APS Interagency Agreement and 115.61 PREA Coordinator Explanatory Memorandum.</p> <p>The Auditor interviewed random staff, the PREA Coordinator, Medical Staff, Mental Health Staff, Random Staff and the Superintendent.</p>

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, Monroe Correctional Complex employees who receive information concerning sexual misconduct, who observe an incident of sexual misconduct or who 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 Monroe Correctional Complex 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 responsibility that may have contributed to an incident or retaliation. All Monroe Correctional Complex 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 Monroe Correctional Complex 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 Monroe Correctional Complex requires immediate action to protect offenders from sexual abuse. Staff interviewed are aware of their reporting requirements and

	<p>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.</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act, section I.A., 115.61 DOC Preventing Sexual Harassment and Sexual Abuse in Prison Section 5.25 – 5.29 and interviews with Random Staff address 115.61 (a).</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act, section I. F, and Attachment 2, 115.61 K10912 APS (Adult Protective Services) Interagency agreement, 115.61 PREA Coordinator Explanatory Memorandum, 115.61 DOC Preventing Sexual Harassment and Sexual Abuse in Prison Section 5.25 – 5.29, and interviews with Random Staff address 115.61 (b).</p> <p>WADOC Policy 490.850 Prison Rape Elimination, section 1. B-D, 115.61 DOC Preventing Sexual Harassment and Sexual Abuse in Prison Section 5.25 – 5.29, and interviews with Medical and Mental Health Staff address 115.61 (c).</p> <p>WADOC Policy 350.550 (all), Revised Code of Washington (RCW) 74.34.020, 115.61 K10912 APS (Adult Protective Services) Interagency agreement, 115.61 DOC Preventing Sexual Harassment and Sexual Abuse in Prison Section 5.25 – 5.29, and interviews with the Superintendent and the PREA Coordinator addresses 115.61 (d).</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act, section I.A. 115.61 DOC Preventing Sexual Harassment and Sexual Abuse in Prison Section 5.25 – 5.29, and interview with the Superintendent address 115.61 (e).</p> <p>The Monroe Correctional Complex complies with Standard 115.61: Staff and agency reporting duties.</p>
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115.62	Agency protection duties
	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 490.850 Prison Rape Elimination Act Response 3. 115.62 IMRS Notification samples Unit movement based on allegations. <p>Interviews:</p> <ol style="list-style-type: none"> 1. Superintendent

2. Agency Head
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 Superintendent, and the Agency Head.

The Pre-Audit Questionnaire indicates that in the past 12 months, the number of times the facility determined that an inmate was subject to a substantial risk of imminent sexual abuse was zero. A review of policy and interviews with the Superintendent, the Agency Head 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.

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.

	<p>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.</p> <p>The staff interviewed are aware of their reporting requirements and the steps needed to ensure the incarcerated individual's safety.</p> <p>The Agency Head 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.</p> <p>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.</p> <p>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., 115.62 IMRS Notification samples Unit movement based on allegations, and the interviews with the Superintendent, the Agency Head and Random Staff address 115.62 (a).</p> <p>The Monroe Correctional Complex complies with Standard 115.62: Agency protection duties.</p>
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115.63 Reporting to other confinement facilities	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.850 Prison Rape Elimination Act Response 2. WADOC Policy 490.860 Prison Rape Elimination Investigation 3. 115.63 Notification Samples <p>Interviews</p> <ol style="list-style-type: none"> 1. Agency Head 2. Superintendent <p>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 Agency Head and the Superintendent.</p> <p>The PREA Compliance Manager reported that within the past 12 months, the facility</p>

	<p>received eight allegations of inmate abuse occurring at other facilities. Seven of these cases were notified within 72 hours, while one was delayed due to the inability to identify the correct facility in Montana, not indicative of a systemic issue.</p> <p>Allegations received from other facilities concerning incidents that may have occurred at the Monroe Correctional Complex are promptly investigated. One such allegation was received at the Monroe Correctional Complex, and it was investigated.</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act Response, section III.D addresses 115.63 (a).</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act Response, section III.D, and 115.63 notification Samples address 115.63 (b).</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act Response, section III.D, 115.63 notification Samples address 115.63 (b) address 115.63 (c).</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act Response, section III.D, WADOC Policy 490.860 Prison Rape Elimination Investigation (all), and interviews with the Agency Head, and Superintendent address 115.63 (d).</p> <p>The Monroe Correctional Complex complies with Standard 115.63: Reporting to other confinement facilities.</p>
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115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.850 Prison Rape Elimination Act Response 2. 115.64 1st Responder Duties 3. 115.64 First Responders Pocket Guide 4. DOC Preventing Sexual Harassment and Sexual Abuse Prisons pages 64-75. <p>Interviews conducted with:</p> <ol style="list-style-type: none"> 1. Random Staff 2. Inmate who reported sexual abuse 3. Staff Random interviews during on site visit <p>The following policy was reviewed WADOC Policy 490.850 Prison Rape Elimination Act Response.</p> <p>During the Onsite tour, informal discussions were conducted by the Auditor with the</p>

	<p>Monroe Correctional Complex 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 act as necessary to ensure the victim's safety, isolate and contain, do not destroy any evidence and call the Shift commander. These informal discussions included one Unit Manager, Two Lieutenants, and three correctional officers.</p> <p>The Random staff interviewed indicated they had received training that included the duties of a first responder.</p> <p>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.</p> <p>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.</p> <p>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, DOC 02-021 Aggravated Sexual Assault Medical Follow-Up Checklist, interview with inmates who reported sexual abuse and Security and Non-Security staff first Responders address 115.64 (a).</p> <p>Random Interviews with security staff during one site tour addresses 115.64 (b).</p> <p>The Monroe Correctional Complex complies with Standard 115.64: Staff first responder duties.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy 490.850 Prison Rape Elimination Act Response

2. Response Plan Table of Contents

Interviews:

1. Superintendent
2. Staff Random interviews during on site visit

The following policy and other documentation were reviewed: WADOC Policy 490.850 Prison Rape Elimination Act Response and the Response Plan Table of Contents.

The Auditor interviewed the Superintendent.

During the Onsite tour, informal discussions were conducted by the Auditor with Monroe Correctional Complex 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 act as necessary to ensure the victim's safety.

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.

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 Monroe Correctional Complex PREA Response Plan involves coordinating staff, including First Responders, Medical and Mental Health providers, Investigators and outside law enforcement, and Executive staff.

The Auditor held informal discussions with the Day Shift Lieutenant, and Swing Shift Lieutenant. Each Lieutenant was able to access the Coordinated Response Plan quickly. Each Lieutenant 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. The 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.

WADOC Policy 490.850, Section II, a review of the PREA Response Plan, interviews with the Superintendent, informal discussions with Shift Lieutenants and a review of the PREA Investigation Process (Attachment 1), the PREA Reporting Process

	<p>(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).</p> <p>The Monroe Correctional Complex complies with Standard 115.65: Coordinated response.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <p>115.66 teamsters 117 2023-2025 115.66 Washington Federation 2023-2025 RCW 72.09.225 WAC 357.40.010</p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>The following documents were reviewed: 115.66 teamsters 117 2023-2025 Collective Bargaining Agreement, Article 8 Discipline and Article 3 Management Rights, RCW 72.09.225 and WAC 357.40.010.</p> <p>The Washington State Penitentiary has no limit on its ability to remove alleged sexual abusers from contact with any incarcerated individuals 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 Washington State Penitentiary complies with Standard 115.66: Preservation of ability to protect incarcerated individuals from contact with abuser.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Documents:

1. WADOC Policy 490.860 Prison Rape Elimination Act Investigation
2. 115.67 PREA Retaliation Monitoring Tracking Sheet September 2023 – August 2024
3. 115.67 Retaliation Monitoring Samples
4. 115.67 Staff Retaliation Monitoring list of staff

Interviews:

1. Staff who Monitor Retaliation
2. Agency Head
3. Superintendent

The following policy was reviewed: WADOC Policy 490.860 Prison Rape Elimination Act Investigation.

The Auditor interviewed the Agency Head, the Superintendent and staff who monitor retaliation. The Monroe Correctional Complex reports that zero incidents of retaliation have occurred at the facility in the past 12 months.

The Monroe Correctional Complex 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 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 that the facility monitors the conduct and treatment of the incarcerated individuals or staff who reported sexual abuse and those who were

	<p>reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation.</p> <p>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).</p> <p>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).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Section II A-D., 115.67 PREA Retaliation Monitoring Tracking Sheet September 2023 – August 2024, 115.67 Retaliation Monitoring Samples, 115.67 Staff Retaliation Monitoring list of staff and the interview with the Superintendent and staff monitoring retaliation addresses 115.67 (c).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Section II A-D., 115.67 PREA Retaliation Monitoring Tracking Sheet September 2023 – August 2024, 115.67 Retaliation Monitoring Samples, and the interview with staff monitoring retaliation address 115.67 (d).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, Section II A-D., 115.67 PREA Retaliation Monitoring Tracking Sheet September 2023 – August 2024, 115.67 Retaliation Monitoring samples and the interview with the Superintendent, the Agency Head and staff monitoring retaliation addresses 115.67 (e).</p> <p>The Monroe Correctional Complex complies with Standard 115.67: Agency protection against retaliation.</p>
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115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<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 <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</p>

	<p>Segregation and 490.850 Prison Rape Elimination Act Response.</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 documents the reasons and duration for access restrictions.</p> <p>According to the Pre-Audit Questionnaire, during the audit documentation period, the number of individuals who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero. And the number of individuals who allege to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement was zero.</p> <p>WADOC Policy 490.850 Prison Rape Elimination Act Response, Section V. D. WADOC Policy 320.200 Administrative Segregation, Section III.A, and IV.A.1 – 3, interviews with the Superintendent and Staff who supervise incarcerated individuals in segregated housing address 115.68 (a).</p> <p>The Monroe Correctional Complex complies with Standard 115.68: Post-allegation protective custody.</p>
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115.71	Criminal and administrative agency investigations
	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. WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting 3. WADOC Policy 400.360 Polygraph Testing of Offenders 4. 115.71 DOC Records Retention V1.6 5. 115.71 Administrative Investigations training 6. 115.71 Appointing Authority curriculum 7. 115.71 Case Log 09-01-23 to 08-31-24 8. 115.71 K8487 WSP MOU 9. 115.71 LE Referral Logs 09-01-23 to 08-31-24 10. 115.71 Administrative Investigations training 11. MCC Investigation Worksheets

Interviews:

1. Investigators
2. Superintendent
3. PREA Coordinator
4. PREA Compliance Manager
5. Inmates who reported sexual abuse

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 Investigators were also reviewed. Interviews with the Superintendent and Investigators were conducted, and thirty-one investigative files were reviewed.

The Monroe Correctional Complex is committed to conducting thorough, prompt, and objective administrative investigations into allegations of sexual abuse and sexual harassment. Administrative investigations into allegations of sexual misconduct are managed internally by Monroe Correctional Complex Investigators. These investigations cover all reported allegations, including third-party and anonymous reports. The Department ensures that every allegation is taken seriously and investigated comprehensively, regardless of whether the individual involved remains under the department's jurisdiction or authority. This commitment extends to cases where the accused staff member is no longer employed by or providing services to the Department.

Criminal investigations are referred to the Monroe Police Department. This procedure ensures that allegations with potential criminal implications receive the appropriate legal scrutiny and expertise.

When an investigation determines that sexual misconduct has occurred, the Department may take disciplinary action against the perpetrator and refer the case for prosecution. This policy ensures accountability and upholds the integrity and safety of the penitentiary environment.

All information related to investigations of sexual misconduct is treated with strict confidentiality. Disclosure of such information is limited to situations where it is necessary for related treatment, security, and management decisions. Staff members who breach confidentiality protocols are subject to corrective or disciplinary action.

Investigations involving represented employees are conducted in accordance with the applicable provisions of the collective bargaining agreement. This ensures that employees' rights are respected while maintaining the integrity of the investigative process.

The Monroe Correctional Complex's dedication to investigating allegations of sexual abuse and harassment reflects its commitment to maintaining a safe and secure environment for all individuals under its jurisdiction or authority. The Department's

policies ensure that allegations are addressed with the seriousness and objectivity they deserve, reinforcing the institution's zero-tolerance stance on sexual misconduct.

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. This includes, as appropriate, preventing the parties from washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. If the situation warrants, staff shall secure the crime scene, including the alleged victim and alleged abuser's clothing, bedding, and any 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. This includes:

- Interviewing alleged victims, suspected perpetrators, and witnesses
- Reviewing prior complaints and reports of sexual abuse involving the suspected perpetrator
- Integrating data from various sources for corroboration, including direct and indirect evidence

The Auditor reviewed training records documenting the investigators' participation in the required training. During their interviews, the facility Investigators were able to specify the training they had received, which covered how to conduct administrative sexual abuse and sexual harassment investigations.

Facility investigators gather and preserve both direct and circumstantial evidence. Investigators are skilled in various evidence collection techniques, including securing physical evidence and documenting crime scenes. A significant aspect of an investigator's training is learning how to conduct thorough and sensitive interviews. Investigators are trained to interview alleged victims, perpetrators, and potential witnesses effectively. They are adept at creating an environment where individuals feel safe and encouraged to provide honest accounts of incidents. Techniques include active listening, maintaining neutrality, and being aware of non-verbal cues. Investigators are also trained to review previous complaints and reports of sexual abuse involving the same suspected perpetrator. This historical review helps establish patterns of behavior and can provide critical context for current investigations.

When interviewed, facility investigators described a range of evidence-gathering techniques. These include collecting physical evidence, such as clothing or personal items, and securing surveillance footage. Investigators also gather electronic evidence, including email messages. To substantiate an administrative allegation of sexual abuse or harassment, investigators utilize both telephone conversations and written correspondence. These methods help verify the presence or absence of

individuals at locations where allegations have reportedly occurred. The use of these techniques ensures a comprehensive investigation that considers all possible sources of information.

Interviews with the Superintendent and investigators indicate a commitment to objectivity in all reported incidents of alleged sexual abuse and harassment. Whether reports are direct, third-party, or anonymous, each is investigated thoroughly and impartially. This objective approach ensures that all findings are based on evidence and facts rather than bias or assumptions.

When sexual abuse is alleged, only staff who have completed specially designed investigator training are assigned to the case. This specialized training focuses on the nuances and sensitivities required for investigating sexual abuse allegations, ensuring that investigators are well-prepared to handle such cases with the utmost professionalism.

In cases where an investigation falls under the responsibility of an appointing authority other than the facility Superintendent or is particularly sensitive, it may be assigned to a trained investigator outside of the facility. This practice helps maintain the investigation's integrity and ensures that any potential conflicts of interest are avoided.

The Washington State Department of Corrections 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 completed, 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 thirty-one 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. 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, detailed, and contained all the required documentation. Upon the Auditor's review of the 31 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.).

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

The Investigators stated that each investigation attempts to determine whether staff actions or failures to act contributed to the alleged sexual abuse; WADOC Form 02-378, (490.860, page 22) 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, 190 allegations resulted in an administrative investigation in the past 12 months, and eight were referred for criminal investigation. Of those eight investigations, four were declined, and four were accepted. The four investigations accepted by the Monroe Police Department are still in the process of being investigated and no final decisions have been made concerning whether the cases will be prosecuted.

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

115.71 Appointing Authority curriculum, 115.71 Administrative Investigations training, Interview with the Facility Investigators and the Superintendent and a review of the training records (115.34) address 115.71 (b).

Interview with the Facility Investigators, MCC Investigation Worksheets and 115.71 Administrative Investigations, pages 18-28, address 115.71 (c).

Interviews with the Facility Investigators, MCC Investigation Worksheets 115.71 Administrative Investigations Training, pages 38-42 address 115.71 (d).

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, 115.71 Administrative Investigations Training, page 77, Credibility Indicators and interview with Investigators and Inmates who reported sexual abuse address 115.71 (e).

Interviews with the Investigators, MCC Investigation Worksheets, and a review of Form 02-378 (490.860, pages 22-23) address 115.71 (f).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation section 1. A. 3 and X. A. 1. f., interviews with the Facility Investigators, and MCC Investigation Worksheets address 115.71 (g).

	<p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation section 1. A. 3., interviews with the Facility Investigators, 115.71 LE Referral Logs 09-01-23 to 08-31-24 and 115.71 K8487 WSP MOU, address 115.71 (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. and interviews with Investigators address 115.71 (j).</p> <p>Interviews with the Superintendent, PREA Coordinator, PREA Compliance Manager and Investigators address 115.71 (l).</p> <p>The Monroe Correctional Complex 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 Appointing Authority curriculum 4. 115.72 PREA Coordinator Explanatory Memorandum 5. 115.72 RCW 72-09-225 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Investigators 2. Superintendent <p>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.</p> <p>The Auditor interviewed the Investigators and the Superintendent.</p> <p>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:</p>

	<ol style="list-style-type: none"> 1. The assigned investigator submits the investigation packet to the Appointing Authority for 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. <p>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.</p> <p>As noted in 490.860, section 1.F., for each allegation in the report, the Appointing Authority will determine whether the allegation is:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section I.F.1., 115.72 Appointing Authority curriculum pages 100 – 101 and interviews with the Investigators and the Superintendent, addresses 115.72 (a).</p> <p>The Monroe Correctional Complex complies with Standard 115.72: Evidentiary standard for administrative investigations.</p>
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115.73	Reporting to inmates
	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 Investigations 2. WADOC Policy 490.800 Prison Rape Elimination Act (PREA) Prevention and

Reporting

3. 115.73 notification samples
4. MCC Investigation Records

Interviews:

1. Superintendent
2. Investigators
3. Inmates who reported sexual abuse

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 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 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 31 investigation files. 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, MCC Investigation Records, 115.73 notification samples, interviews with the Superintendent, the Investigators and inmates who reported sexual abuse addresses 115.73 (a).

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

WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section VIII, A., 115.73 notification samples, interview with inmates who reported sexual abuse address 115.73 (c).

WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section VIII, A., and 115.73 notification samples. (There were no cases during the documentation period that required notification of alleged abuser being indicted, charged, or convicted.) address 115.73 (d).

	<p>WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigations, section VIII, B., 115.73 notification samples, (There were no cases during the documentation period that required notification of alleged abuser being indicted, charged, or convicted.) address 115.73 (e).</p> <p>The Monroe Correctional Complex 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 teamsters 117 2023-2025 4. 115.76 Law Enforcement notifications 5. 115.76 RCW 72-09-225 6. 115.76 Secretary memo re discipline 7. 115.76 Staff Disciplinary Log 8. 115.76 staff discipline samples (letter of reprimand and letter to staff who resigned) 9. 115.76 WAC 357-40-010 10. 115.76 WAC 357-40-015 <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 various case files.</p> <p>The Monroe Correctional Complex 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"> • The Secretary shall immediately institute proceedings to terminate the employment of any person: • 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 • Upon a guilty plea or conviction for any crime specified in chapter 9A.44 RCW

when the victim was an offender."

Washington State Department of Corrections employees must adhere to all state and federal laws. Concerning a PREA allegation, the Agency shall conduct proceedings for 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 three staff resignations for violations of agency sexual abuse or sexual harassment policies at the Monroe Correctional Complex in the past 12 months. Each of the three staff members resigned prior to the completion of the investigation. The PREA Compliance Manager stated appropriate notifications are made to licensing boards or other agencies by the Agency (none were required in the three staff resignations). Policy 490.860 Prison Rape Elimination Act (PREA) Investigations indicates, the Superintendent will ensure the finding(s) are reported to relevant licensing bodies. (Policy 490.860 Prison Rape Elimination Act (PREA) Investigations, IV, L.)

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, 115.76 WAC 357-40-015 and 115.76 staff discipline samples (letter of reprimand and letter to staff who resigned), addresses 115.76 (a).

WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, page 1, Policy I. - IV., Policy 490.860, PREA Investigation, Section IV. A. - D., 115.76 RCW 72.09.225 Sexual misconduct by state employees, contractors, and 115.76 Secretary memo re discipline, address 115.76 (b).

115.76 RCW 72.09.225 Sexual misconduct by state employees, contractors, 115.76 WAC 357.40-001, 115.76 WAC 357-40-015, 115.76 staff discipline samples (letter of reprimand and letter to staff who resigned), and 115.76 Secretary memo re discipline 09-29-2022 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. L., and 115.76 Law Enforcement notifications, address 115.76 (d).

The Monroe Correctional Complex complies with Standard 115.76: Disciplinary sanctions for staff.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <ol style="list-style-type: none"> 1. WADOC Policy DOC 450.050 Prohibited contact 2. WADOC Policy DOC 490.800 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 <p>Interviews</p> <ol style="list-style-type: none"> 1. Superintendent <p>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.</p> <p>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.</p> <p>The PREA Compliance Manager reports there have been no incidents of contractors or volunteers violating the Standards of Conduct at the Monroe Correctional Complex within the past 12 months. The PRE Audit Questionnaire reports one incident involving a contractor, however, the Auditor was informed during the onsite visit that this information was incorrect and the answer to 115.77 (a)-4 is actually zero.</p> <p>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).</p> <p>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).</p> <p>The Monroe Correctional Complex complies with Standard 115.77: Corrective action for contractors and volunteers.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents:</p> <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 Statewide Orientation Handbook (see pages 16-18 and 27-29) 7. 115.78 WAC 137-25-020 - Definitions 8. 115.78 WAC 137-28-310 - Decision of Hearing Officer 9. 115.78 WAC 137-28-360 - Sanctions and Mental Status 10. 115.78 WAC 137-28 - Discipline in Prisons 11. 115.78 WAC 137-28-140 Purpose 12. 115.78 Disciplinary Packet 24-23721 <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Mental Health Specialist 2. Superintendent <p>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.</p> <p>Monroe Correctional Complex 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 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</p>

incarcerated individual's treatment needs would be conducted. The Monroe Correctional Complex 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. The Auditor reviewed the Disciplinary Hearing packet, there was appropriate written notice, the individual had the opportunity to call witnesses, and the decision of the disciplinary committee, along with the reasons for the decision, was documented and provided to the individual.

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 Monroe Correctional Complex.

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., Policy 460.000 Disciplinary Process for Prisons, section II.B. and section IV.G.3.a., and 115.78 Disciplinary Packet 24-23721, 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), 115.78 Disciplinary Packet 24-23721, 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

	<p>and Mental Status (specifically), 115.78 Disciplinary Packet 24-23721, and the interview with the Superintendent address 115.78 (c).</p> <p>WADOC Policy Disciplinary Sanctions Policy 460.050, page 5, section VI and the interview with Mental Health staff address 115.78 (d).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section V.B.1 addresses 115.78 (e).</p> <p>WADOC Policy 490.860 section, V.B.2.b addresses 115.78 (f).</p> <p>WADOC Policy 490.800, Prison Rape Elimination Act Prevention and Reporting, attachment 1, and Statewide orientation handbook pages 18 and 27-29, addresses 115.78 (g).</p> <p>The Monroe Correctional Complex complies with Standard 115.78: Disciplinary sanctions for incarcerated individuals.</p>
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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<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. WADOC Policy 300.380 Classification and Custody Facility Plan Review 7. 115.81 Incoming Transport Job Screen Samples 8. 115.81 Health Record Procedure (HRP) 9. 115.81 HRP Minimum Necessary for Non-Health Services Staff 10. 115.81 PREA Coordinator Explanatory Memorandum 11. 115.81 Sorted Weekly 13-509 Yes Report 12. 115.81 Weekly Yes Report 13-509 September 2023 – August 2024 13. 115.81 Samples 13-509 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Mental Health Specialist 2. Staff who conduct Risk assessments

3. Incarcerated Individuals who disclosed sexual victimization during risk screening

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, 490.800 Prison Rape Elimination Act Prevention and Reporting and 300.380 Classification and Custody Facility Plan Review. The Auditor interviewed two Mental Health Specialists who indicated that incarcerated individuals who experienced prior sexual victimization are provided with the opportunity to meet with a Mental Health Specialist within 14 days of intake screening.

The Monroe Correctional Complex staff (Classification Counselors) arrange a follow-up meeting with a mental health practitioner for incarcerated individuals who disclose any prior sexual victimization during screening.

During their interviews, the Mental Health staff members indicated that sexual harassment or abuse victims are offered treatment. Treatment plans and information 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 Monroe Correctional Complex Counselors 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, job and program assignments. Mental Health clinical notes are maintained separately from the offenders' central file.

The PREA Compliance Manager indicated that the Monroe Correctional Complex 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 an institutional setting is strictly limited. The Monroe Correctional Complex 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.

The Monroe Correctional Complex does refer all individuals who experienced prior sexual victimization or perpetrated sexual abuse whether it occurred in an institutional setting or in the community, to a mental health practitioner within 14 days of intake screening. Upon review of the documentation provided, mental health practitioners do not always meet the individual within 14 days. Currently mental health practitioners meet the 14-day requirement only 80% of the time.

Corrective Action Plan: 115.83 (a) and (b)

Develop a system that ensures all individuals who experienced prior sexual victimization or perpetrated sexual abuse whether it occurred in an institutional setting or in the community meet with a mental health practitioner within 14 days of screening 100% of the time.

Provide completed form 13-509's on all individuals who arrive at the Monroe Correctional Complex between December 2, 2024, and March 31, 2025, or in the alternative provide a database of all individuals who arrived between December 2, 2024, and March 31, 2025, that includes:

1. DOC Number
2. Offender Name
3. Date of Intake
4. Date of 13-509
5. Yes/No meet with Mental Health
6. Date Seen by Mental Health
7. Date Signed by Mental Health
8. Name of Mental Health staff member who signed the 13-509
9. Notes on 13-509

These documents must indicate 100% compliance with the 14-day requirement.

	<p>Corrective Action Plan Update</p> <p>On April 23, 2025, the Auditor was provided with information requested in the Corrective Action plan. The Auditor is satisfied with the documentation received. The completed form 13-509's indicates 100% compliance with the 14 day requirement to meet with mental health practioners.</p> <p>In accordance with the Health Record Guidelines, the health information pertaining to the evaluation and subsequent follow-up care of incarcerated individuals who have been subjected to a sexual abuse incident shall be maintained in a confidential manner and shall only be disclosed when necessary for the purposes of related treatment, investigation, or security and management decisions. Health Services may share specific information concerning the health status of an incarcerated individual with other facility employees/contract staff only when the Health Authority has determined that such disclosure is essential for the management of the health and safety of the incarcerated individual. A PREA investigator may have access to medical/mental health information that is directly related to an incident. Any information that is not directly related to the incident shall be redacted.</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.c., 115.81 PREA Coordinator Explanatory Memorandum, 115.81 Sorted Weekly 13-509 Yes Report, 115.81 Weekly Yes Report 13-509 September 2023 – August 2024, 115.81 Samples 13-509, interviews with staff who conduct risk assessments, mental health staff and incarcerated individuals who disclosed sexual victimization during risk screening, address 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.c., 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., 115.81 Health Record Procedure Page 28, Health Record Management Procedure Non-Health Services Staff Page 2, and 115.81 Incoming Transport Job screening samples addresses 115.81 (d)</p> <p>610.025 Health Services Management of alleged Sexual Misconduct cases, section I.C, interviews with Medical and Mental Health Staff, address 115.81 (e).</p> <p>The Monroe Correctional Complex 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

Documents:

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. 115.82 Forensic medical examinations
6. 115.82 Trust Fund Statement samples
7. 115.82 RCW 7.68.170

Interviews:

1. Medical Staff
2. Mental Health staff
3. Incarcerated Individual who reported sexual abuse
4. Staff Random interviews during tour

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 and Policy 490.850 Prison Rape Elimination Act Response.

The Auditor interviewed Medical Staff, Mental Health Staff, and 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 Monroe Correctional Complex'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 reports 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., Providence Regional Medical Center Everett) 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.

	<p>Incarcerated individuals who meet with SAFE/SANE nurses in the community are provided with information regarding emergency contraception and sexually transmitted infection prophylaxis, which is followed up by facility health services personnel. Monroe Correctional Complex is partnered with Providence Regional Medical Center Everett and utilizes SAFE/SANE to provide this information.</p> <p>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.</p> <p>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.</p> <p>Information and access to care are offered to all victims, as clinically indicated. Washington State Department of Corrections policies concerning offenders' co-pays for medical treatment are not applied to victims of sexual abuse.</p> <p>During the audit documentation period, there were four reported cases of an aggravated sexual assault that indicated a forensic medical examination.</p> <p>WADOC Policy 610.025 Health Services Management of Alleged Sexual Misconduct 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 staff random interviews during tour address 115.82 (b).</p> <p>WADOC Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases, section II A and B., section III A. – G., 115.82 Forensic medical examinations, Interviews 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., 115.82 Trust Fund Statement samples, 115.82 RCW 7.68.170 address 115.82 (d).</p> <p>The Monroe Correctional Complex complies with Standard 115.82: Access to emergency medical and mental health services.</p>
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	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 Program2. WADOC Policy 600.000 Health Services Management3. WADOC Policy 610.025 Health Services Management of Alleged Sexual Misconduct Cases4. WADOC Policy 490.850 Prison Rape Elimination Act Response5. WADOC Policy 630.500 Mental Health Services6. 115.83 PREA Coordinator Explanatory Memorandum7. 115.83 13-509 Mental Health Encounters samples8. 115.83 Aggravated Assault Follow-up samples 02-0219. 115.83 RCW 7.68.17010. 115.83 Trust fund Statement samples <p>Interviews conducted with:</p> <ol style="list-style-type: none">1. Mental Health Staff2. 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 Mental Health Staff members and Medical Health staff members.</p> <p>When an allegation is reported to the Monroe Correctional Complex 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."</p> <p>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</p>

	<p>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.</p> <p>The Monroe Correctional Complex 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. Monroe Correctional Complex policies concerning incarcerated individuals' co-pays for medical treatment are not applied to victims of sexual abuse.</p> <p>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, Policy 630.500 Mental Health Services, section III.B.1.c., 115.83 13-509 Mental Health Encounters samples, and 115.83 Aggravated Assault Follow-up samples 02-021 address 115.83 (a).</p> <p>115.83 PREA Coordinator Explanatory Memorandum, and interviews with Medical and Mental Health staff address 115.83 (b).</p> <p>Interviews with Medical and Mental Health Staff address 115.83 (c).</p> <p>Monroe Correctional Complex is an all-male facility. 115.83 (d) and (e) are not applicable.</p> <p>WADOC Policy 610.025, Health Services Management of Alleged Sexual Misconduct 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., 115.83 medical billing Incarcerated 1 and 2 and RCW 7.68.170, address 115.83 (g)</p> <p>WADOC Policy 610.025, section VI, WADOC Policy 630.500 Mental Health Services, section III. B. c., and interview with Mental Health staff address 115.83 (h).</p> <p>The Monroe Correctional Complex 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

Documents:

1. WDOC Policy 490.860 Prison Rape Elimination Act Investigation
2. 115.86 DOC 02-383 Local PREA Investigation Review Checklist
3. 115.86 MCC Local Review Committee Database
4. Monroe SAIR Worksheets

Interviews:

1. Incident Review Team member
2. Superintendent
3. PREA Compliance Manager

The following policy was reviewed: WADOC Policy DOC 490.860 Prison Rape Elimination Act Investigation. In addition, the Auditor reviewed fifteen Local PREA Review Committee reports.

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; 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 Monroe Correctional Complex 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 fifteen. The Auditor reviewed each of these incidents and the review team considered the following in each case:

- 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.

Of the fifteen Incident Reviews (Local PREA Investigation Review Checklist) only five were completed within 30 days of the conclusion of the investigation.

Action Plan for Compliance with PREA Standard 115.86(b)

To ensure compliance with PREA Standard 115.86(b), which mandates such reviews shall ordinarily occur within 30 days of the conclusion of the investigation.

Conduct Local PREA Investigation Reviews 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 within 30 days of the conclusion of the investigation.

Provide the Auditor with a copy of all Local PREA Investigation Reviews conducted between November 18, 2024, and March 31, 2025. Ensure that all reviews are documented accurately and submitted within the required timeframe.

Implement a monitoring system to track the completion and submission of Local PREA Investigation Reviews.

Regularly review the system to ensure ongoing compliance with the 30-day requirement.

Complete all actions and provide the required documentation to the Auditor by March 31, 2025.

Corrective Action Plan update: On March 4, 2025, the Auditor was notified that the following system was implemented to ensure sexual abuse incident reviews were completed with the 30 day time frame indicated in the standard.

- The MCC PREA Compliance Specialist (PCS) will maintain an Incident Review spreadsheet that documents the date the Appointing Authority reviews and signs completed investigations requiring an incident review, the finding of the investigation, the maximum date the review should be completed, the date the review was conducted, and any action plan the committee recommends.

- MCC PCS will schedule a Sexual Abuse Incident Review Team on a two-week rotational basis. If unforeseen circumstances prevent an incident review from occurring on the scheduled date, then it will be rescheduled to no more than one week from that date. The PREA Compliance Manager (PCM) will complete the incident reviews in the absence of the PCS.
- The Sexual Abuse Incident Review spreadsheet and prepared review forms will be maintained in a file accessible to PCM, PCS, and the Corrections Specialist Assistant who will monitor and access the information in the event of the PCS's absence.
- For cases assigned to Appointing Authorities outside of the facility, the Appointing Authority/Health Services Investigator 3 will reach out to the PCS who will put the case on the next scheduled Sexual Abuse Incident Review Team. The Appointing Authority/Health Services Investigator 3 will complete DOC 02-383 Local PREA Investigation Review checklist.
- The Appointing Authorities will ensure that investigations are completed and provided to the PCS or the Health Services Investigator in a timely manner to ensure sufficient time to complete the Incident Reviews.

On March 31, 2025, the facility submitted reviews of 21 sexual abuse incidents that were conducted between November 2024 and March 2025. All sexual abuse incident reviews were conducted within the 30-day time frame indicated in the standard. The Auditor is satisfied that this corrective action plan is complete, and the facility now complies with 115.86(b).

WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section III, the Monroe SAIR worksheets 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 Monroe SAIR worksheets 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 Monroe SAIR worksheets and the interview with the Superintendent address 115.86 (c).

115.86 DOC 02-383 Local PREA Investigation Review Checklist and interviews with the Superintendent, PREA Compliance Manager and Incident Review Team Member address 115.86 (d).

DOC 02-383 Local PREA Investigation Review Checklist, Monroe SAIR worksheets and interviews with the Superintendent, PREA Compliance Manager and Incident Review Team Member address 115.86 (e).

The Monroe Correctional Complex complies with Standard 115.86: Sexual abuse incident reviews.

115.87	Data collection
	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 490.860 Prison Rape Elimination Act Investigation 3. WADOC Policy 490.850 Prison Rape Elimination Act Response 4. 115.87 PREA Coordinator Explanatory Memorandum 5. 115.87 SSV 2021 Summary 6. 115.87 SSV 2022 Summary 7. 115.87 Contracted Facilities Data 2021-2023 <p>The following policies were reviewed, WADOC Policy 490.800 Prison Rape Elimination Act Prevention and Reporting, and Policy 490.860 Prison Rape Elimination Act Investigation In addition, the Survey of Sexual Victimization State Prison Systems Summary 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 Case notes <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</p>

	<p>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, 490.860 section, I.D. and 115.87 PREA Coordinator Explanatory Memorandum address 115.87 (a).</p> <p>WADOC Policy 490.860 section, Section IX. A. – D., and SSV Summary (2021 and 2022) address 115.87 (b)</p> <p>WADOC Policy 490.860 section, Section IX. A. – D., SSV Summary (2021 and 2022), and 115.87 PREA Coordinator Explanatory Memorandum addresses 115.87 (c).</p> <p>WADOC Policy 490.860 section, Section IX. A. – D., 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. A. – D., Policy 490.800 Section II. A. 5, 115.87 Contracted Facilities Data 2021-2023, addresses 115.87 (e).</p> <p>Survey of Sexual Victimization State Prison Systems Summary (2021 and 2022) addresses 115.87 (f).</p> <p>The Monroe Correctional Complex complies with Standard 115.87: Data collection.</p>
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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. 2023 Annual Report <p>Interviews:</p> <ol style="list-style-type: none"> 1. Agency Head 2. PREA Coordinator 3. PREA Compliance Manager

	<p>The following documentation was reviewed: WADOC Policy 490.860 Prison Rape Elimination Act Investigation and the Washington State Department of Corrections Annual PREA Report.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The Auditor did review the Annual Report for 2023. 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.</p> <p>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 2023 Annual Report address 115.88 (a).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX C. 1. c., and the 2023 Annual Report address 115.88 (b).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX C. 2., interview with the Agency Head, the 2023 Annual Report, and the website https://www.doc.wa.gov/docs/publications/reports/400-RE004.pdf addresses 115.88 (c).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX C. 2. a., interview with the PREA Coordinator and the 2023 Annual Report, address 115.88 (d).</p> <p>The Monroe Correctional Complex complies with Standard 115.88: Data review for corrective action.</p>
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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. 115.89 PREA Coordinator Explanatory Memorandum
7. 2023 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 State 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.

All investigation reports, hotline call recordings, and related allegation information are

	<p>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 .</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., 115.89 OMNI PREA database access 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, address 115.89 (b).</p> <p>WADOC Policy 490.860 Prison Rape Elimination Act Investigation, section IX C. 2. a., and the 2023 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 Monroe Correctional Complex complies with Standard 115.89: Data storage, publication, and destruction.</p>
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115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>This is the fourth PREA Audit Conducted at the Monroe Correctional Complex.</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 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</p>

	<p>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, Monroe Correctional Complex 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. 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 on the agency website. The Auditor reviewed the Agency's prior PREA Audit Reports.</p> <p>This audit is the facility's fourth PREA audit. PREA Reports are 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
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Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
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115.11 (b) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

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

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

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

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

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	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.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	yes

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

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

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

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

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

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	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?	no
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and	yes

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

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

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

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

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

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

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	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).	no
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.)	no
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	na
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	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.)	na
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation 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?	no
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

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

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

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

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