

PREA Facility Audit Report: Final

Name of Facility: Ellis Unit

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 01/17/2025

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: Ronell Prioleau	Date of Signature: 01/17/2025

AUDITOR INFORMATION	
Auditor name:	Prioleau, Ronell
Email:	r.priolo@yahoo.com
Start Date of On-Site Audit:	12/04/2024
End Date of On-Site Audit:	12/06/2024

FACILITY INFORMATION	
Facility name:	Ellis Unit
Facility physical address:	1697 FM 980 , Huntsville, Texas - 77343
Facility mailing address:	2 Financial Plaza Suite 105, Huntsville, Texas - 77340

Primary Contact

Name:	Brenda German
Email Address:	Brenda.German@tdcj.texas.gov
Telephone Number:	9364373439

Warden/Jail Administrator/Sheriff/Director	
Name:	Bruce Johnson
Email Address:	Bruce.Johnson@tdcj.texas.gov
Telephone Number:	936-295-5756

Facility PREA Compliance Manager	
Name:	Terrence Cooper
Email Address:	terrence.cooper@tdcj.texas.gov
Telephone Number:	936-295-5756

Facility Health Service Administrator On-site	
Name:	Brooke Davis
Email Address:	bbdavis@utmb.edu
Telephone Number:	936-295-5756 x5119

Facility Characteristics	
Designed facility capacity:	2482
Current population of facility:	2334
Average daily population for the past 12 months:	2342
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Mens/boys

<p>Which population(s) does the facility hold? 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)</p>	
<p>Age range of population:</p>	16-78
<p>Facility security levels/inmate custody levels:</p>	G1 - G5, Security Detention, GRAD, RP GRAD, CYP
<p>Does the facility hold youthful inmates?</p>	Yes
<p>Number of staff currently employed at the facility who may have contact with inmates:</p>	417
<p>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</p>	70
<p>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</p>	176

AGENCY INFORMATION	
Name of agency:	Texas Department of Criminal Justice
Governing authority or parent agency (if applicable):	
Physical Address:	861 Interstate 45, Huntsville, Texas - 77320
Mailing Address:	PO Box 99, Huntsville, Texas - 77340
Telephone number:	8005350283

Agency Chief Executive Officer Information:	
Name:	Bryan Collier

Email Address:	bryan.collier@tdcj.texas.gov
Telephone Number:	936-437-2101

Agency-Wide PREA Coordinator Information			
Name:	Cassandra McGilbra	Email Address:	cassandra.mcgilbra@tdcj.texas.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:	2024-12-04
2. End date of the onsite portion of the audit:	2024-12-06

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
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AUDITED FACILITY INFORMATION

14. Designated facility capacity:	2482
15. Average daily population for the past 12 months:	2342
16. Number of inmate/resident/detainee housing units:	29
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input 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:	2296
19. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	24
20. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
21. 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:	0
22. 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:	2
23. 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:	5
24. 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:	87

<p>25. 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:</p>	<p>19</p>
<p>26. 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:</p>	<p>0</p>
<p>27. 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:</p>	<p>17</p>
<p>28. 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:</p>	<p>22</p>
<p>29. 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:</p>	<p>0</p>
<p>30. 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):</p>	<p>No text provided.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>31. 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:</p>	<p>210</p>

32. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	176
33. 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:	70
34. 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

35. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	20
36. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None

37. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	<p>I reviewed the number of inmates required to interview. I reviewed all the inmate races, age span and varied release dates within the population. I then ensured I considered a variety of race, age and release dates. I further ensured I considered inmates from each housing unit. I also considered program assignments.</p>
38. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
39. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	<p>No text provided.</p>
Targeted Inmate/Resident/Detainee Interviews	
40. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	<p>22</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
41. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:	<p>4</p>

<p>42. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>43. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>43. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>43. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The completed PAQ information collaborated the numbers the facility provided. Multiple interviews conducted and during the site review did not produce any of this targeted group of inmates. I verified by asking all inmates who were interviewed if they were a person with a disability or part of a targeted group. I further asked if they knew of any other inmates that may be part of the targeted groups. The Auditor interviewed all the residents that were available to be interviewed.</p>
<p>44. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>44. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>44. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The completed PAQ information collaborated the numbers the facility provided. Multiple interviews conducted and during the site review did not produce any of this targeted group of inmates. I verified by asking all inmates who were interviewed if they were a person with a disability or part of a targeted group. I further asked if they knew of any other inmates that may be part of the targeted groups. The Auditor interviewed all the residents that were available to be interviewed.</p>
<p>45. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>45. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>45. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The completed PAQ information collaborated the numbers the facility provided. Multiple interviews conducted and during the site review did not produce any of this targeted group of inmates. I verified by asking all inmates who were interviewed if they were a person with a disability or part of a targeted group. I further asked if they knew of any other inmates that may be part of the targeted groups. The Auditor interviewed all the residents that were available to be interviewed.</p>
<p>46. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>3</p>
<p>47. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>5</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>48. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>48. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The completed PAQ information collaborated the numbers the facility provided. Multiple interviews conducted and during the site review did not produce any of this targeted group of inmates. I verified by asking all inmates who were interviewed if they were a person with a disability or part of a targeted group. I further asked if they knew of any other inmates that may be part of the targeted groups. The Auditor interviewed all the residents that were available to be interviewed.</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>4</p>
<p>50. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>5</p>
<p>51. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>51. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>51. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The completed PAQ information collaborated the numbers the facility provided. Multiple interviews conducted and during the site review did not produce any of this targeted group of inmates. I verified by asking all inmates who were interviewed if they were a person with a disability or part of a targeted group. I further asked if they knew of any other inmates that may be part of the targeted groups. The Auditor interviewed all the residents that were available to be interviewed.</p>
<p>52. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>53. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>13</p>
<p>54. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>55. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>56. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>57. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>16</p>
<p>58. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>59. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>60. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>61. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

62. 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
63. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
63. Enter the total number of VOLUNTEERS who were interviewed:	3
63. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
64. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
64. Enter the total number of CONTRACTORS who were interviewed:	3
64. 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 checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
65. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

66. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Was the site review an active, inquiring process that included the following:	
67. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
68. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
69. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
70. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p>71. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>No text provided.</p>
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Documentation Sampling

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

<p>72. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p>73. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>No text provided.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	5	1	5	1
Staff-on-inmate sexual abuse	10	0	10	0
Total	15	1	15	1

75. 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	5	0	5	0
Staff-on-inmate sexual harassment	1	0	1	0
Total	6	0	6	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.

76. 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	1	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	1	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	5	0
Staff-on-inmate sexual abuse	0	5	2	3
Total	0	5	7	3

Sexual Harassment Investigation Outcomes

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

78. 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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	1	4	0
Staff-on-inmate sexual harassment	0	0	1	0
Total	0	1	5	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

15

<p>81. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>82. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>5</p>
<p>83. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>84. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>85. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>10</p>
<p>86. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>87. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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Sexual Harassment Investigation Files Selected for Review

<p>88. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>6</p>
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<p>89. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
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Inmate-on-inmate sexual harassment investigation files

<p>90. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>5</p>
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<p>91. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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<p>92. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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Staff-on-inmate sexual harassment investigation files	
93. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
94. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
95. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
96. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
97. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input type="radio"/> Yes <input checked="" type="radio"/> No

Non-certified Support Staff	
<p>98. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>98. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:</p>	<p>1</p>
AUDITING ARRANGEMENTS AND COMPENSATION	
<p>99. Who paid you to conduct this audit?</p>	<p><input type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
<p>Identify the name of the third-party auditing entity</p>	<p>Correctional Consulting Services</p>

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>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Agency Head Interview Notes 6. PREA Compliance Manager Interview Notes <p>The Texas Department of Criminal Justice (TDCJ) and the Ellis Unit have established a written policy that enforces a zero-tolerance stance toward all forms of sexual abuse and harassment. This policy outlines the agency's approach to preventing, detecting, and responding to such conduct. The agency has appointed a high-level, agency-wide</p>

	<p>PREA Coordinator who possesses the necessary time and authority to develop, implement, and oversee efforts to ensure compliance with PREA standards across all facilities.</p> <p>During interviews with the PREA Coordinator/PREA Ombudsman and the PREA Compliance Manager, both individuals detailed their responsibilities, demonstrating their capacity to manage the duties associated with their positions effectively. The auditor reviewed the entire policy and observed staff performing their duties within the facility. Staff members managed incidents in accordance with the policy and were able to articulate the specifics of the policy during discussions.</p> <p>The knowledge exhibited by line staff regarding the policy, coupled with their ability to engage in comprehensive conversations about it, served as evidence that training and policy updates are current. The efforts of the PREA Compliance Manager to manage a successful PREA program were clearly evident.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</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>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Informal Conversations with Staff 5. Agency Contract Administrator Interview Notes 6. Agency Head Interview Notes 7. Specialty Staff Interview Notes <p>This Standard was audited at the Agency level, the Auditor verified and reviewed all the Agency reported information for accuracy. The Ellis Unit does not manage public contracts for the confinement of its inmates.</p> <p>The Auditor reviewed approximately 20 of 27 current Texas Department of Criminal Justice (TDCJ) confinement contracts and determined the contract language included an obligation for the contractor to adopt and comply with the Prison Rape Elimination Act (PREA) standards. Through interviews with the PREA Coordinator and the Agency</p>

	<p>Contract Administrator, the Auditor confirmed the Agency has a contract monitor position to ensure that the contractor is complying with the PREA standards. The contract administrator stated that currently, all the facilities are either in compliance, in the review process, or awaiting their scheduled audit. This policy procedure is documented within the TDCJ Safe Prisons/PREA Plan and verified by this Auditor.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard</p>
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115.13	Supervision and monitoring
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. PREA Coodinator Interview Notes 5. Warden Interview Notes 6. Informal Conversations with Staff 7. PREA Compliance Manager Interview Notes 8. Specialty Staff Interview Notes <p>The Texas Department of Criminal Justice/Ellis Unit regularly reviews its staffing plan to ensure adequate staffing levels and, where necessary, video monitoring to safeguard both inmates and staff against sexual abuse. During interviews with the Warden and the PREA Compliance Manager, it was confirmed that, in developing and reviewing the staffing plan, considerations are given to current and emerging best correctional practices; any judicial or oversight rulings; the facility's physical layout; the security levels of the inmate population; the staff-to-inmate ratio, including supervisors; the programming capabilities available for each shift; the incidence of sexual assaults in specific areas of the facility; relevant state and local laws; and any special circumstances. The staffing plan undergoes an annual review and documentation, while camera monitoring is conducted weekly. The extensive camera coverage throughout the facility, combined with appropriate staffing levels, adds an additional layer of security for both staff and inmates.</p> <p>The TDCJ has implemented a Safe Prisons/PREA Plan, which mandates that intermediate-level or higher-level supervisors perform and document unannounced</p>

	<p>rounds to identify and deter instances of staff sexual abuse and harassment. This policy applies to all shifts and requires logging in the housing unit logbook. It also prohibits staff from alerting other personnel to the occurrence of these supervisory rounds, unless such notification serves a security purpose. The Auditor observed these rounds being conducted and reviewed multiple logbooks, confirming that they are a regular part of shift functions but not performed at regular intervals as a security measure. When the PREA Compliance Manager is notified that an unannounced round has not occurred in areas frequented by inmates, a corrective action training session is scheduled immediately to address the issue and reinforce the importance of these rounds. The Auditor examined documentation of a specific incident when a round was missed, and corrective training was conducted immediately. The re-training documentation was an example of how the unannounced rounds are viewed as a serious deterrent tool for preventing sexual abuse and sexual harassment within the unit. The Warden was asked about this training and he concurred with the re-training put in place by the PREA Compliance Manager.</p> <p>The Auditor reviewed the current staffing plan, which was signed by the Warden, Regional Director, and PREA Coordinator in April 2024. There have been no deviations from the staffing plan in the past 12 months. Informal discussions with staff revealed that overtime is utilized to cover vacant critical positions.</p> <p>Based on a thorough and detailed review, the Auditor determined that the facility complies with the requirements of this standard.</p>
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115.14	Youthful inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Informal Conversations with Staff 5. Site Review Observations 6. Targeted Youth Inmates Interview Notes 7. Specialty Staff Interview Notes <p>The Texas Department of Criminal Justice/Ellis Unit Safe Prisons/PREA Plan along with Unit Classification Procedures outlines the protocols for managing youthful inmates.</p>

The policies stipulate that youthful offenders must not be placed in housing units where they can have sight, sound, or physical contact with adult offenders through shared day-rooms, common areas, showers, or sleeping quarters. The Ellis Unit does accommodate youthful inmates, with 24 such individuals present during the onsite audit. These inmates are housed in a three-floor wing, with each inmate occupying a spacious cell alone. There is no sight or sound contact between these youthful inmates and the adult inmate population. Interviews with staff supervising this wing and the youthful inmates themselves confirm that they have no contact with adult inmates.

According to the Safe Prisons/PREA Plan and the unit classification procedures, correctional staff must maintain sight and sound separation between youthful and adult offenders when youthful offenders are outside their housing areas. Direct supervision is required whenever there is any possible sight, sound, or physical contact between these two groups. At the time of the audit, the Ellis Unit housed 24 youthful offenders, and interviews with staff supervising these inmates, as well as with educational staff providing programming, confirmed that they are consistently separated from the adult inmate population. During educational programming, hallways leading from the youthful offender wing to classroom areas are cleared of other inmates. Security personnel escort the youthful inmates from their housing units to the classrooms, and a security staff member remains present in the classroom for the duration of the programming.

The Safe Prisons/PREA Plan states that the agency (TDCJ) will make every effort to avoid isolating youthful offenders solely for the purpose of maintaining sight and sound separation. The plan further indicates that these inmates should not be denied access to daily large muscle exercise or legally required special education services unless under exigent circumstances. Additionally, youthful inmates should have access to other programs and work opportunities whenever possible.

During the onsite audit, the Ellis Unit housed 24 youthful offenders. Interviews with the line staff supervising these individuals, as well as education and program staff, indicated that these youthful offenders are not subjected to isolation. While they are housed in single cells, they have access to daily large muscle exercise. The spacious design of the cells allows for exercise even when security measures restrict them to their cells. Programming is facilitated by education and program staff either in the program room on the wing or by bringing necessary paperwork to the inmates to work with them at their cell front, when appropriate. All cells feature open bars.

After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.

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

Evidence relied upon to make Compliance Determination:

1. TDCJ Policy and Document Review
2. Pre-Audit Questionnaire Responses
3. TDCJ Safe Prisons/PREA Plan
4. Specialty Staff Interview Notes
5. Random Staff Interview Notes
6. Random Inmates Interview Notes
7. Site Review Observations
8. Targeted Inmate Interview Notes

The Ellis Unit does not conduct cross-gender visual body cavity searches or strip searches unless in exigent circumstances or when conducted by a medical examiner. The facility does not house female inmates and has not conducted any cross-gender searches within the facility within the last 12 months. The Auditor reviewed policy, that allow inmates 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.

The current policy also requires staff of the opposite gender to announce their presence when entering an inmate housing unit. The Auditor observed all areas of the facility and housing units and noted large appropriate shower areas in use throughout the facility and appropriate dressing areas. Other areas had pony wall partitions between toilet bowls to create privacy from female staff conducting security rounds. The inmate strip areas had temporary partitions and is only staffed by male security staff.

The Ellis Unit has never searched or physically examined a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If an inmate's genital status is unknown, it would be determined as part of a broader medical examination conducted in private by a medical practitioner or by reviewing medical records or patient-doctor conversations. This was verified through multiple interviews of random staff, specialized staff interviews and informal and formal conversations with targeted group inmates. The facility has ensured all security staff are trained on how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Staff training records and search and seizure training slides were reviewed to verify all staff were trained how to conduct cross-gender searches and pat-down searches of transgender and intersex inmates.

After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.

<p>115.16</p>	<p>Inmates with disabilities and inmates who are limited English proficient</p>
<p>Auditor Overall Determination: Meets Standard</p>	
<p>Auditor Discussion</p>	
<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Agency Head Interview Notes 5. Specialty Staff Interview Notes 6. Random Staff Interview Notes 7. Informal Conversations with Staff 8. Targeted Inmate Interview Notes 9. Site Review Observations <p>The Ellis Unit has taken 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. These steps include, when necessary to ensure effective communication with inmates who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. This Auditor reviewed written materials in Spanish and brail and verified staff interpreters were available throughout the Agency to ensure effective communication with inmates who speak limited English.</p> <p>Inmates with physical disabilities and who have intellectual disabilities, limited reading skills, or who are blind or have low vision are also given the same programing opportunities and access to the facilities efforts to prevent, detect, and respond to sexual assault and sexual harassment. I confirmed the use of staff interpreters as well as the use of a paid interpreter service during random inmate interviews and informal staff conversations; The facility never uses inmate interpreters. The Auditor interviewed three Spanish speaking inmates with staff interpreters. All targeted population inmates interviewed confirmed they had received the PREA education and had no problems with obtaining the PREA information during the intake process. All targeted inmates could explain the zero-tolerance policy, knew how to properly report an allegation of sexual abuse, and knew what behavior was considered inappropriate and what behavior is considered sexual abuse.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>	

115.17	Hiring and promotion decisions
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 266 544 300">Auditor Discussion</p> <hr/> <p data-bbox="256 344 1075 378">Evidence relied upon to make Compliance Determination:</p> <ol data-bbox="256 412 791 875" style="list-style-type: none"> <li data-bbox="256 412 780 445">1. TDCJ Policy and Document Review <li data-bbox="256 479 791 512">2. Pre-Audit Questionnaire Responses <li data-bbox="256 546 695 580">3. TDCJ Safe Prisons/PREA Plan <li data-bbox="256 613 544 647">4. Staff File Reviews <li data-bbox="256 680 767 714">5. Informal Conversations with Staff <li data-bbox="256 748 719 781">6. Random Staff Interview Notes <li data-bbox="256 815 732 848">7. Specialty Staff Interview Notes <p data-bbox="256 904 1477 1364">The Texas Department of Criminal Justice/Ellis Unit as an Agency has not hired or promoted 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 lock up institution. TDCJ has not enlisted the 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 lock up institution. TDCJ has not hired or promoted or used the services of anyone 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; or has been civilly or administratively adjudicated to have engaged in the activity as described.</p> <p data-bbox="256 1397 1477 1565">The TDCJ Safe Prisons/PREA Plan prohibit the facility/Agency from hiring, promoting or doing business with a person or business who may have contact with inmates who has engaged in or attempted to engage in sexual abuse while in incarcerated, or convicted of, civilly or administratively of the same.</p> <p data-bbox="256 1599 1477 1800">The Auditor verified this by reviewing a new hire applicant packet as well as reviewing multiple personnel files that included criminal background checks and self-disclosure forms. During my personnel file review I found this same process of checking backgrounds is also completed when starting new vender contracts and when qualifying staff for in-house promotions.</p> <p data-bbox="256 1834 1477 2047">Before hiring new employees, who may have contact with inmates, the Agency (1) Performs a criminal background records check; and (2) 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.</p>

	<p>The Agency also conducts criminal background records checks at least every five years of current employees and contractors who may have contact with inmates. This is accomplished by central headquarters notifying the Unit when staff have contact with law enforcement. The current policy also requires that staff self-disclose new information related to sexual conduct behavior. Failure to self-disclose new sexual conduct behavior are grounds for termination. Finally, through policy the facility/ Agency has an obligation to report sexual conduct behavior to other institutional employers. These processes were verified through interviews with unit leadership team, central headquarters human resources staff and informal conversation with random staff.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.18	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Agency Head Interview Notes 5. Specialty Staff Interview Notes 6. Informal Conversations with Staff 7. Site Review observations <p>The Ellis Unit have not added new camera or video equipment however, when they do add new camera or video equipment the Agency with the facility input would consider the effect of the modification upon the agency’s ability to protect inmates from sexual abuse. Through interviews with Agency Head and facility leadership, I confirmed that when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, central headquarters and the facility always considers how such technology will enhance the facilities ability to protect inmates from sexual abuse. This Auditor verified this information with central headquarters staff interviews.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>

115.21	Evidence protocol and forensic medical examinations
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 297">Auditor Discussion</p> <p data-bbox="256 340 1075 374">Evidence relied upon to make Compliance Determination:</p> <ol data-bbox="256 412 791 875" style="list-style-type: none"> <li data-bbox="256 412 778 445">1. TDCJ Policy and Document Review <li data-bbox="256 483 791 517">2. Pre-Audit Questionnaire Responses <li data-bbox="256 555 695 589">3. TDCJ Safe Prisons/PREA Plan <li data-bbox="256 627 772 660">4. Targeted Inmates Interview Notes <li data-bbox="256 698 719 732">5. Random Staff Interview Notes <li data-bbox="256 770 730 804">6. Specialty Staff Interview Notes <li data-bbox="256 842 767 875">7. Informal Conversations with Staff <p data-bbox="256 913 1477 1283">The Ellis Unit adheres to current policies and the Texas Department of Criminal Justice Safe Prisons/PREA Plan, which stipulate that the Agency is responsible for investigating allegations of sexual abuse. The Agency follows a uniform evidence protocol designed to maximize the chances of obtaining usable physical evidence for both administrative proceedings and criminal prosecutions. It is responsible for conducting administrative investigations into sexual assaults. This was confirmed through an interview with the lead investigator at the Unit. Upon reviewing the Agency's protocol, the Auditor concluded that it is suitable for youth and meets national standards, as stated by the lead investigator.</p> <p data-bbox="256 1321 1477 1731">The Ellis Unit ensures that inmate victims of sexual abuse have access to forensic medical examinations at external facilities, at no financial cost, when medically appropriate. Currently, there is no Memorandum of Understanding (MOU) with an Advocacy Agency; however, the facility/Agency is actively pursuing the establishment of such an agreement. If Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) are unavailable, examinations are conducted by other qualified medical professionals at the local hospital. The Auditor reviewed and verified an advocacy cancellation of services letter, which cited a lack of available non-profit funding. This was corroborated through both formal and informal interviews, as well as the provided documentation.</p> <p data-bbox="256 1769 1445 2056">When a crisis center advocate is not available to provide victim advocacy services, the facility uses a qualified staff member from a community-based organization or a qualified member of the Agency/facility staff. During the onsite phase of the audit, the Auditor interviewed the PREA Compliance Manager, who confirmed the institution's efforts to partner with an external agency for victim advocacy services, although these efforts have not yet been successful. As a result, the institution utilizes an Offender Victim Representative (OVR), a staff member trained to assist</p>

	<p>sexual abuse victims. This was further supported by both targeted and random interviews with inmates.</p> <p>If requested by the inmate victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member is present to provide support throughout the forensic medical examination process and investigatory interviews. They offer emotional support, crisis intervention, information, and referrals.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Agency Head Interview Notes 5. TDCJ Website Review 6. Specialty Staff Interview Notes <p>The Ellis Unit ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment accusations. This was confirmed through an interview with the unit lead investigator and the review of current policies, Texas Department of Criminal Justice Safe Prisons/PREA Plan and informal conversations with staff and inmates.</p> <p>The Auditor could not find any reports or grievances related to sexual abuse or sexual harassment that were not investigated properly. There were 21 allegations that were investigated within the last 12 months. The facility has a policy that governs the investigative process to ensure that all allegations of sexual abuse or sexual harassment are investigated by investigators with the legal authority to conduct criminal investigations and administrative investigations of sexual abuse or sexual harassment in prisons or jails.</p> <p>TDCJ indicated that the OIG is the primary investigative and law enforcement entity of the TDCJ. The OIG serves as the independent office responsible for conducting investigations in accordance with professional standards related to the field of</p>

	<p>investigations in a government environment. Interviews with investigative staff indicate that the OIG has the legal authority to conduct criminal investigations. The policy regarding investigations is published on the agency’s website: https://www.tdcj.texas.gov/divisions/oig/index.html. The PREA Compliance Manager and PREA Coordinator confirmed that there are several policies that mandate the investigation of sexual abuse and sexual harassment allegations at the TDCJ. All criminal investigations are performed by the OIG. The agency publishes this information on its website.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.31	Employee training
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Employee Training Records 6. Random Staff interview Notes 7. Site Review Observations 8. Informal Conversations with Staff <p>The Ellis Unit has trained all new or transferred in employees who may have contact with inmates on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates’ rights to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and (10) How to</p>

	<p>comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. This was verified by interviewing multiple random staff and all being very familiar with all the training topics and were able to recall the approximate last time they were trained. Several newer staff had laminated cards that outlined the first responder duties.</p> <p>All current employees at TDCJ receive in-service training annually to ensure that all employees know the Agency's current sexual abuse and sexual harassment policies and procedures. The annual in-service training is in addition to all new employee PREA training, the agency updates this training yearly on current sexual abuse and sexual harassment policies. This training is tailored for male inmates because the facility does not house female inmates. All training is electronically documented in the employees training records. I reviewed 10 employee training records, and all had documented completion of the initial sexual abuse and sexual harassment prevention training. All random staff interviewed recalled receiving the training.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Informal Conversations with Staff 5. Volunteer and Contractor File Reviews 6. Volunteer and Contractor Interview Notes <p>The Ellis Unit ensures that all volunteers and contractors who have contact with inmates are trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Multiple interviews were conducted with contractors and volunteers, and all recalled receiving the sexual assault and sexual harassment prevention training.</p> <p>Specifically, three volunteers and three contractors who have contact with inmates, were interviewed and asked directly if they were notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to</p>

	<p>report such incidents; they all responded in the affirmative. The level and type of training provided to volunteers and contractors varies depending on the level of contact with the inmate population. The Auditor reviewed some signed and some computer-generated completion records documentation confirming that volunteers and contractors understood the training they had received. This PREA re-training is either completed online or in-person. I validated the training further with informal conversations with staff and volunteer file reviews.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.33	Inmate education
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Informal Conversations with Staff and Inmates 6. Inmate File Reviews 7. Random Inmate Interview Notes <p>During the intake process at the Ellis Unit, inmates are provided with information outlining the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment, as well as instructions on how to report incidents or suspicions. This information is included in the inmate handbook. This was confirmed through interviews with both inmates and randomly selected staff members. Additionally, I verified the presence of Zero Tolerance Acknowledgment for Offenders Forms in inmate files, ensuring they were signed by the inmates.</p> <p>Inmates participate in an in-depth orientation, during which the facility conducts training on the Prison Rape Elimination Act (PREA). This was corroborated by interviews with leadership staff and informal conversations with inmates. The orientation is conducted on the same day of arrival or within seven days of an inmate's arrival at the facility.</p> <p>The Unit offers educational materials in accessible formats for all inmates, including those who are limited English proficient, deaf, visually impaired, or have other</p>

	<p>disabilities, as well as inmates with limited reading skills. Educational materials are provided in Spanish, and designated staff members at both the agency and the facility offer interpretation for other languages.</p> <p>The Ellis Unit displays key information regarding the zero-tolerance policy and reporting procedures through signage strategically placed throughout the facility. I observed this signage during the facility site review. The Auditor also confirmed that the signage was in place prior to the audit based on interviews with inmates and staff.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.34	Specialized training: Investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Informal Conversations with Staff 6. Investigator Training Records <p>In addition to the general training provided to all employees as mandated by § 115.31, the Ellis Unit and the Agency assert that its investigators have undergone specialized training for conducting investigations within confinement settings. The Agency’s policy is aligned with established standards.</p> <p>The Agency is responsible for both administrative and criminal investigations pertaining to all incidents of sexual abuse and sexual harassment. Investigators from the Office of the Inspector General (OIG) are sworn law enforcement officers trained specifically in conducting criminal investigations. These OIG investigators report to the Texas Board of Criminal Justice, which oversees the Texas Department of Criminal Justice Agency. During the onsite phase of the audit, the Auditor interviewed the unit investigator and PREA Compliance Manager (PCM), who confirmed participation in the investigator training course provided by the Department, successfully earning the corresponding certification. The investigator was able to articulate all key points from this provision and stated that it was included in their training. The Auditor reviewed</p>

	<p>training records and verified completion of the online course offered by the Department. The training encompassed techniques for interviewing sexual abuse victims, evidence collection for sexual abuse in confinement settings, and the necessary criteria and evidence needed to substantiate cases for administrative action or prosecution referral. This was corroborated through interviews with the PREA Compliance Manager and a review of the master training list.</p> <p>The Auditor examined all documentation verifying the specialized training attended by the PCM, which was also confirmed during interviews with the facility leadership. All Agency investigators are certified and have received extensive training in conducting investigations, including specific courses focused on sexual abuse investigations.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Informal Conversations with Staff 6. Medical and Mental Health Staff Training Records <p>The Ellis Unit and the Agency ensures that all full and part-time medical and mental health care practitioners who work regularly in its facilities are trained in: (1) How to detect and assess signs of sexual abuse and sexual harassment; (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. I confirmed this training with the medical and mental health staff during interviews. The Agency policy is written in accordance with the standard.</p> <p>The medical staff at Ellis Unit do not conduct sexual assault or forensic medical examinations onsite. All forensic medical examinations are conducted at the local emergency room. The medical and mental health care practitioners receive the</p>

	<p>training mandated for employees under § 115.31 or for contractors under § 115.32, depending upon the practitioner’s status at the agency. TDCJ and Ellis Unit maintains all documentation that medical and mental health practitioners have received the training referenced in this standard either from the Agency or elsewhere.</p> <p>The Ellis Unit is providing this specialized training on a yearly basis to all medical and mental health care practitioners. I confirmed this while interviewing the medical supervisor and through informal conversations with medical and mental health practitioners and a review of the training records.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</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>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. PREA Coordinator Interview Notes 6. Site Review Observations 7. Inmate File Reviews 8. Informal Conversations with Staff 9. Random Inmate Interview Notes <p>The Ellis Unit adheres to a policy that aligns with established standards. This policy mandates that the facility conduct assessments of all inmates during the intake screening process and upon transfer to another facility to evaluate their risk of being sexually abused by other inmates or exhibiting sexually abusive behavior towards others. The Auditor has confirmed the existence of this policy.</p> <p>The intake screening process evaluates several factors, including, but not limited to: (1) the inmate's perception of vulnerability; (2) the inmate's age; (3) the inmate's physical build; (4) whether the inmate has prior incarceration experience; (5) whether the inmate's criminal history is exclusively nonviolent; (6) any prior convictions for</p>

sexual offenses against adults or children; (7) the inmate’s sexual orientation or gender identity, including whether they are perceived as gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) any prior experiences of sexual victimization; (9) the existence of any mental, physical, or developmental disabilities; and (10) whether the inmate is detained solely for civil immigration purposes. The auditor reviewed the screening tool to ensure its objectivity. This tool requires a straightforward yes or no response to each question, and its scoring system is uniformly applied to all inmates screened. Since the screening tool does not permit subjective responses, it is deemed objective, as verified through interviews and a review of randomly selected inmate files.

An examination of 15 inmate files indicated that screenings were completed on the day of arrival at the unit. The Auditor also interviewed the PREA Compliance Manager about the risk screening process and confirmed that assessments for all inmates occur within mere hours of their arrival on the day of intake.

The Ellis Unit reassesses all inmates within 30 days of their arrival. This reassessment is carried out by classification staff, who consider all relevant information available at the time of the evaluation. This process was validated through a review of reassessment documentation and staff interviews. Additionally, inmates are reassessed when circumstances arise that warrant further evaluation due to a referral, request, incident of sexual abuse, or the acquisition of new information that could affect the inmate’s risk of sexual victimization or abusiveness. This was corroborated during staff interviews and multiple reviews of inmate files.

Inmates are informed during the screening process that they will not face disciplinary action for refusing to answer questions or for not providing complete information. All inmates have the freedom to choose whether to respond. Staff members are encouraged to motivate inmates to answer questions by explaining that the information contributes to their safety. This practice was confirmed through an examination of the screening forms as well as during formal and informal interviews with staff and inmates.

During staff interviews and informal discussions with classification personnel, I learned that access to the intake self-assessment forms is restricted to those staff members who require the information, such as the PREA Compliance Manager and supervisors. If an inmate is identified as high-risk during the initial assessment, they are promptly referred to mental health services for further screening and support.

After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence relied upon to make Compliance Determination:

1. TDCJ Policy and Document Review
2. Pre-Audit Questionnaire Responses
3. TDCJ Safe Prisons/PREA Plan
4. Specialty Staff Interview Notes
5. Inmate File Reviews
6. Targeted Inmate Interview Notes
7. Informal Conversations with Staff and Inmates

The Ellis Unit conducts screenings for every inmate upon their arrival at the facility. This information is used to guide decisions regarding housing, bed assignments, work, education, and program placements. The aim is to separate inmates at high risk of sexual victimization from those likely to engage in sexual abuse. The PREA Coordinator confirmed that there is no consent decree in place; instead, inmates are individually screened and housed. This was corroborated by a review of the policy, which adheres to established standards. I further verified these procedures through interviews with staff and random inmates.

The Texas Department of Criminal Justice (TDCJ) does not assign lesbian, gay, bisexual, transgender, or intersex (LGBTI) inmates to dedicated facilities, units, or wings solely based on their identity or status, unless such placements are mandated by a consent decree, legal settlement, or court ruling designed to protect these inmates.

The Ellis Unit effectively screens inmates before assigning them to cells. Using the information gathered from screenings and inmate self-disclosure forms, the facility can make safe cell assignments for all high-risk inmates, including those who identify as LGBTI. During the on-site phase of the audit, the auditor interviewed the PREA Compliance Manager, who also oversees inmate risk screenings. When asked about how the agency utilizes the risk screening information, they explained that the scores for victimization and abusive behavior risks are entered into the classification system. This system helps ensure that inmates with differing risk scores are not housed together. The Ellis Unit is committed to maintaining the necessary separation for safety. Housing decisions are made on an individual basis and are based on the risk screening scores, affecting not only inmate housing but also their job assignments and program participation. I confirmed this process through interviews with random inmates, informal discussions with staff, and specialized staff interviews.

LGBTI inmates are reassessed as necessary, with a minimum of biannual assessments conducted. This fact was verified through interviews with specialized staff, random inmate interviews, and reviews of facility policy and inmate files.

After a thorough and detailed review of all relevant information, the auditor concluded that the facility complies with the requirements of this standard.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Site Review Observations 6. Informal Conversations with Staff <p>The Ellis Unit and the Agency maintain a protective custody policy that aligns with this standard. According to the policy, no high-risk inmates who are at risk of sexual abuse will be placed in segregated housing unless an assessment reveals that all alternative housing options are inadequate to separate the alleged abuser from the potential or alleged victim. During the onsite phase of the audit, the Auditor interviewed the Warden, who confirmed that involuntary segregation is not employed at Ellis to protect inmates at risk of victimization. Inmates at Ellis are only placed in restricted housing when no other options are available. In cases where inmates choose to be segregated, they are transferred to other units. The Auditor corroborated this information through informal discussions with staff and inmates.</p> <p>Over the past 12 months, the Ellis Unit has not had to place any high-risk inmates in segregation.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. Informal Conversations with Staff

4. TDCJ Safe Prisons/PREA Plan
5. TDCJ Website Review
6. Specialty Staff Interview Notes
7. Random Staff Interview Notes
8. Random Inmate Interview Notes
9. Site Review Observations
10. PREA Coordinator Interview Notes
11. Agency Head Interview Notes

The Ellis Unit provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. A random inmate demonstrated the procedure he could privately report a sexual assault or sexual harassment by using his computer tablet. All inmates are issued a computer tablet and can privately report sexual abuse or sexual harassment. Inmates can write letters, request a meeting with a staff member or unit supervisor. The inmates may write a letter to the PREA Ombudsman, the Unit Office of the Inspector General or the Main Office of the Inspector General. I verified the contact information on multiple bulletin boards throughout the facility during the audit onsite observation. During the onsite phase of the audit, the Auditor completed a full site review and located the posted zero-tolerance signs throughout the facility with the reporting information for the PREA Ombudsman Office, including the mailing address. The posted signs were written in two languages, English and Spanish. Offenders are also provided this information in the TDCJ Offender Handbook and in the Sexual Abuse Awareness Brochure.

The Auditor interviewed the PREA Compliance Manager/Unit Safe Prisons PREA Manager and asked about the outside reporting entity. They explained that the PREA Ombudsman office was established specifically to oversee efforts to eliminate sexual abuse and sexual harassment of offenders. The offenders are encouraged to report allegations directly to staff or to the PREA Ombudsman's office. The Auditor interviewed 22 random inmates, and all knew how to report allegations of sexual abuse to the PREA Ombudsman's office. They knew the information was posted on the signs in the housing unit. During the random inmate interviews the inmates consistently were able to name various ways to privately report sexual abuse or sexual harassment. Many inmates mentioned reporting directly to staff or the Unit Safe Prisons PREA Manager (USPPM) as their first avenue to report abuse. That option is displayed clearly with wall art paintings throughout the facility.

Texas Department of Criminal Justice also provides a direct phone number and email address to the Inspector General's office on its website for family/third party or staff to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward inmate or staff

	<p>reports of sexual abuse and sexual harassment to agency officials, allowing the inmate or staff to remain anonymous upon request.</p> <p>Random staff that were interviewed all stated they would accept reports made verbally, in writing, anonymously, and from third parties and always promptly document any verbal reports. All staff interviewed were aware of the policy and were able to provide at least one method to privately report sexual abuse and sexual harassment of inmates. After the random inmate interviews, the Auditor was confident the facility had developed a positive culture around the subject of reporting sexual abuse and sexual harassment.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.52	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Informal Conversations with Staff 6. Site Review Observations <p>The Ellis Unit has ensured all provisions of this standard are comprehensively covered in the Agency's Inmate/Offender Grievance Process. To ensure thoroughness, I reviewed this policy; during this review, I also questioned staff regarding their understanding and implementation of the procedure, specifically in the context of grievances related to sexual abuse. The staff demonstrated a clear understanding of the process and were well-versed in the steps to take if an inmate were to file such a grievance. It is worth noting that the audited facility reported four grievances filed within the last 12 months pertaining to sexual abuse. This information was corroborated through interviews with staff and inmates, as well as a supporting documentation of sample grievances from the facility.</p> <p>Furthermore, the inmates interviewed were aware of their rights and the process to file a grievance concerning sexual abuse. However, they expressed a preference for utilizing other reporting avenues available to them such as reporting anonymously or</p>

	<p>directly to a staff member. This suggests that while the grievance process is known and understood, inmates feel more comfortable or find it more effective to report through different channels such talking to a trusted staff member. On the staff side, interviewees confirmed their awareness of their duty to assist inmates in filing grievances if requested. They also emphasized their commitment to reporting incidents immediately as required by policy and ensuring timely and appropriate responses to any allegations of sexual abuse.</p> <p>The Agency's robust training and clear policies are evident in these practices, demonstrating a well-structured approach to handling grievances involving sexual abuse. Regular training and updates ensure that staff remain knowledgeable and prepared to handle such sensitive matters efficiently and empathetically.</p> <p>After a meticulous review of all the relevant documentation and a comprehensive analysis of the information obtained through interviews at the facility level, I have concluded that the facility does meet the requirements of this standard.</p>
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115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. PREA Coordinator Interview Notes 6. Random Inmate Interview Notes 7. Informal Conversations with Staff and Inmates <p>Offenders within the Ellis Unit/Texas Department of Criminal Justice (TDCJ) have access to confidential support services, which are outlined in the Agency's policies and procedures and TDCJ Safe Prisons/PREA Plan. In the inmate handbook, bulletin boards and available on inmate tablets details about the available support services are clearly laid out. Currently, TDCJ does not have an active Memorandum of Understanding (MOU) with a local crises center; however, inmates do have access to write a letter or make an unmonitored phone call to an agency within the Texas Association Against Sexual Assault directory if requested. Additionally, there are two trained staff inmate victim representatives on the unit. This was verified through</p>

	<p>interviews with targeted inmates, random inmates and random staff.</p> <p>When incidents occur, inmates receive support equivalent to what they would receive in the community. This consistency ensures that their needs are met regardless of their circumstances. Follow-up mental health care is available for both victims and abusers involved in incidents.</p> <p>The PREA Compliance Manager takes the responsibility of informing inmates about communication monitoring during the intake orientation process. They clarify the extent to which communications will be observed and how reports of abuse will be handled in accordance with mandatory reporting laws. This transparency helps maintain trust and ensures that inmates are aware of the process. This orientation process was verified through formal and informal conversations with inmates and staff. Many inmates interviewed were aware of outside services but had never wanted or needed to use the services.</p> <p>TDCJ Safe Prisons/PREA Plan states, “Attempts will be made to make a victim advocate from a rape crisis center available to the offender victim first. If a rape crisis center is not able to provide the offender with victim advocate services, the unit will make available a qualified staff member from a community-based organization. If a qualified staff member from a community-based organization is not able to provide the offender with victim advocate services, the unit will make available a qualified TDCJ staff member to provide the offender with victim advocate services. Through secure mail and telephone access, inmates have the option to contact these victim advocate agencies. Privacy is respected, and inmates can choose whether to utilize these services. The Auditor tested the confidentiality of the advocate contact process while discussing the mail routing procedures. During an interview with the PREA Coordinator it was disclosed that TDCJ is actively working to establish an MOU with a victim support services advocate agency.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes

	<p>5. Informal Conversations with Staff</p> <p>6. Site Review Observations</p> <p>7. Random Inmate Interviews</p> <p>The Ellis Unit has established a procedure to receive third-party reports of sexual abuse and sexual harassment. The procedures are written in accordance with standard allowing inmates and other outsiders to report incidents on behalf of other inmates. This is described in Agency policy and the TDCJ Safe Prisons/PREA Plan. The Agency’s website provides clear instructions for third-party reporting, which were verified during a review.</p> <p>Throughout the Ellis Unit there are posters throughout the facility such as: inmate living units, medical, program areas, intake, visitation, and reception areas regarding third-party reporting and the address required to file the complaint. The inmates are provided an address to contact the Office of State Inspector General, and this information is posted on the PREA intake pamphlet, inmate handbook, PREA video, and signs posted near the inmate information bulletin boards.</p> <p>Multiple inmate interviews indicated knowledge of the third-party reporting methods and inmates advised they felt extremely comfortable reporting all allegations of sexual misconduct. Furthermore, the facility prominently displays signage for third-party reporting avenues in areas accessible to visitors. This was verified through interviews with the PREA Compliance Manager, informal conversations with staff and inmates, observations during the site review and review of facility website.</p> <p>After a thorough examination of all documentation and information gathered during facility interviews, it was determined that the facility meets all the requirements of this standard.</p>
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115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes

5. PREA Coordinator Interview Notes

6. Site Review Observations

7. Random Staff Interview Notes

The Texas Department of Criminal Justice (TDCJ)/Ellis Unit mandates that all staff immediately report any knowledge, suspicion, or information regarding incidents of sexual abuse or sexual harassment that occur within the facility, regardless of whether the incident is related to the agency. This also includes reports of retaliation against inmates or staff who have made such reports, as well as any staff neglect or violation of responsibilities that may have contributed to the incident or subsequent retaliation. Such requirements are supported by protocol testing, the site review checklist, and random interviews with staff.

In addition to reporting to designated supervisors or officials, staff members are prohibited from disclosing any information related to a sexual abuse report to anyone, except as necessary in accordance with agency policy for treatment, investigation, and other security and management purposes. This is further supported by policy documentation and interviews with randomly selected staff.

Medical and mental health practitioners are required to report incidents of sexual abuse in accordance with established policy. They must also inform inmates about their duty to report and the limitations of confidentiality at the onset of their services, as confirmed by interviews with medical and mental health personnel.

The TDCJ/Ellis Unit policy stipulates that any allegations involving victims under the age of 18 or classified as vulnerable adults necessitate reporting to the designated state or local agencies according to mandatory reporting laws. The pre-audit questionnaire and interviews with the PREA Coordinator and the Warden revealed that no such reports have been made; however, if an incident were to occur, the Department of Family and Protective Services would be notified. Furthermore, unit policy mandates that all allegations of sexual abuse and sexual harassment—including those reported by third parties or submitted anonymously—must be reported to the Office of the Inspector General. The Warden confirmed in an interview that this is the standard practice. A review of investigative reports corroborates that all allegations are consistently reported to the Office of the Inspector General.

Based on the evidence presented, the facility is compliant with this standard.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Random Staff Interview Notes 6. Agency Head Interview Notes <p>When the Ellis Unit staff learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate, as evidenced by policy, TDCJ Safe Prisons/PREA Plan and interviews with the Agency Head Designee, the Warden and random staff. As notated by the pre-audit questionnaire responses, the facility has not had to initiate this policy within the last 12 months, that an inmate was subject to a substantial risk of imminent sexual abuse. The staff interviewed however, understood their responsibility and all random staff interviewed responded that they would immediately take appropriate steps to protect the inmate no matter the circumstances. Informal conversations with inmates also revealed inmates were comfortable that staff would act upon reporting an imminent risk of sexual abuse incident.</p> <p>After a review of all information the Auditor determined the facility meets the requirements of this standard.</p>
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115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Agency Head Interview Notes 6. Informal Conversations with Staff <p>When the Ellis Unit receives notification of an allegation that an inmate was sexually</p>

	<p>abused while confined at another facility, the head of the facility that received the allegation promptly informs the appropriate head of the facility or office within the agency where the alleged abuse occurred. This process is confirmed through existing policies and interviews with the Agency Head Designee, the Warden, and various staff members. The Warden indicated that any notification from an outside agency would be immediately forwarded for investigation. Additionally, the Agency Head clarified that external notifications are referred without delay to the PREA Ombudsman office and to the Office of the Inspector General (OIG) for investigation, just as with any other allegation.</p> <p>The Warden of the Ellis Unit or the relevant agency office that receives such notifications ensures that the allegations are investigated in accordance with established standards, as evidenced by policy documentation and the TDCJ Safe Prisons/PREA Plan review, alongside interviews with the Agency Head Designee and the Warden. These notifications are executed as quickly as possible, but not later than 72 hours after the receipt of the allegation, as supported by policy review.</p> <p>After a thorough and meticulous review of all relevant information, the Auditor concluded that the facility complies with the requirements of this standard.</p>
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115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Random Staff Interview Notes 6. Targeted Inmate Interview Notes <p>The Ellis Unit of the Texas Department of Criminal Justice (TDCJ) has implemented a policy that outlines the responsibilities of first responders, which include both security and non-security staff, in the event of a sexual abuse incident. The protocol involves the following steps: (1) separating the alleged victim from the alleged abuser; (2) preserving and safeguarding the crime scene until appropriate measures are taken to collect any evidence; (3) if the abuse occurred within a timeframe that permits the collection of physical evidence, advising the alleged victim against engaging in any actions that might compromise that evidence, such as washing, brushing teeth,</p>

	<p>changing clothes, urinating, defecating, smoking, drinking, or eating; and (4) similarly, if the abuse occurred within a relevant timeframe, ensuring that the alleged abuser refrains from any actions that could destroy physical evidence.</p> <p>If the first responder is not a member of the security staff, they are required to advise the alleged victim on how to preserve physical evidence and then promptly notify security personnel. This process has been corroborated through policy reviews and interviews with 12 randomly selected staff members, many of whom served as first responders.</p> <p>The pre-audit questionnaire revealed that over the past twelve months, there have been 15 allegations of sexual abuse. All interviewed staff demonstrated a clear understanding of their first responder responsibilities. They confirmed that they would separate the alleged victim from the alleged perpetrator, secure the crime scene, and instruct inmates not to compromise any physical evidence. Among the 15 allegations, security staff members were the first responders in 13 instances, effectively separating the alleged victim from the abuser. In the last 12 months, there were nine allegations where staff were notified in a timeframe suitable for the collection of physical evidence. Inmates who reported incidents of sexual abuse stated that staff responded promptly and separated them from their alleged abuser immediately.</p> <p>Based on the evidence provided by the Ellis Unit staff, the facility adheres to the TDCJ Safe Prisons/PREA Plan, which governs the duties of first responders, encompassing both security and non-security personnel. The policy enforces a four-step action plan as previously described. The auditor conducted numerous formal and informal interviews, including discussions with the PREA Compliance Manager, first responders, and supervisory staff, all of whom indicated a comprehensive understanding of the requirements of this standard</p> <p>After a thorough and detailed review of all relevant information, the auditor has determined that the facility meets the requirements of this standard.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes

	<p>5. Random Staff Interview Notes</p> <p>6. Informal Conversations with Staff</p> <p>The Ellis Unit has developed a written institutional plan; the Coordinated Response Plan, to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership, as evidenced by the reviewed documentation provided and an interview with the Warden and other facility leadership.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</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>This Standard was audited at the Agency level, the Auditor verified and reviewed all the Agency reported information for accuracy.</p> <p>As notated in the pre-audit questionnaire and during an interview with the Agency Head Designee, collective bargaining is not recognized by the State of Texas.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Agency Head Interview Notes

6. Inmate File Reviews

7. Targeted Inmate Interview Notes

The Texas Department of Criminal Justice (TDCJ) and the Ellis Unit have implemented a policy, along with a TDCJ Safe Prisons/PREA Plan, designed to protect all inmates and staff who report incidents of sexual abuse or harassment, or who cooperate with related investigations, from retaliation by other inmates or staff members. This policy also specifies which staff members or departments are responsible for monitoring retaliation, as evidenced by facility policies and staff interviews.

The Ellis Unit/TDCJ has introduced several protective measures, such as transferring inmate victims or abusers, removing alleged staff or inmate abusers from contact with victims, and providing emotional support services to inmates or staff who fear retaliation for reporting sexual abuse or harassment or for cooperating with investigations. These measures are supported by reviews of inmate files from investigations and interviews with the Agency Head Designee, the Warden, designated staff responsible for monitoring retaliation, and inmates who have reported instances of sexual abuse.

For a minimum of 90 days following a report of sexual abuse, the facility will monitor the conduct and treatment of both the inmates or staff who reported the abuse and those who were reported as victims. This monitoring aims to identify any changes that may indicate potential retaliation by inmates or staff, and the facility will take prompt action to address any such retaliation. If the initial monitoring suggests a continuing need, the facility will extend this monitoring beyond the initial 90-day period, as evidenced by policy documents, retaliation monitoring data, and interviews with the Warden and designated monitoring staff.

Regarding inmates, the monitoring process will also include periodic status checks, as documented in the retaliation monitoring data within the investigative files, as well as interviews with the staff responsible for overseeing retaliation monitoring.

If any other individual cooperating with an investigation expresses concerns about retaliation, the facility will implement appropriate measures to protect that individual, as demonstrated by interviews with the Agency Head Designee, the Warden, and random staff members. Numerous instances of retaliation monitoring have been observed in action; based on reviews of investigative files and detailed discussions with staff, the Auditor is confident that the staff possess the knowledge required to implement these procedures when necessary.

Following a thorough and detailed review of all relevant information, the Auditor has concluded that the facility meets the requirements outlined in this standard.

115.68 Post-allegation protective custody

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon to make Compliance Determination:

1. TDCJ Policy and Document Review
2. Pre-Audit Questionnaire Responses
3. TDCJ Safe Prisons/PREA Plan
4. Specialty Staff Interview Notes
5. Informal Conversations with Staff

Any use of segregated housing by Ellis Unit to protect an inmate who is alleged to have suffered sexual abuse is subject to the requirements of standard 115.43, as evidenced by review of policy and interviews with the Warden and staff who supervise segregated housing.

The Texas Department of Criminal Justice Safe Prisons/PREA Plan, the Protective Safe Keeping Plan and the Transient Status Offenders Directive all address the use of restricted or segregated housing at Ellis Unit and throughout TDCJ. The plan defines offenders pending the outcome of an offender protection investigation as being in transient status. It also states that this status is reserved for offenders who are placed in restrictive housing on a temporary basis pending the outcome of a formal investigation related to allegations of sexual abuse, sexual harassment, extortion, violence, or threats of violence. The plan dictates confinement in restrictive housing shall be in accordance with the appropriate confinement procedures for the offender's specific category of restrictive housing. Under the review procedures by the Restrictive Housing Committee (RHC) section, the plan states, "All offender initially placed in restrictive housing shall be afforded an initial hearing within 7 days and shall undergo a documentation review by the RHC every 7 days for the first 60 days, and at least every 30 days thereafter to determine if the offender is suitable for placement in a less restrictive category or custody."

The Ellis Unit leadership indicated in the pre-audit questionnaire (PAQ) there have been no inmates involuntarily segregated following the report of a sexual abuse allegation over the last 12 months. This was further verified through informal conversations with staff that no inmates were placed in involuntarily segregation following the report of a sexual abuse allegation over the last 12 months.

It was also notated in the PAQ, and stated by the Warden during an interview no inmates have been placed in segregated housing who alleged to have suffered sexual abuse.

After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon to make Compliance Determination:

1. TDCJ Policy and Document Review
3. Pre-Audit Questionnaire Responses
4. TDCJ Safe Prisons/PREA Plan
5. PREA Coordinator Interview Notes
6. Investigative Report Reviews
7. Specialty Staff Interview Notes
8. Targeted Inmate Interview Notes
9. Investigator Training Records
10. Site Review Observations
11. Informal Conversations with Staff

The operating procedure of the Ellis Unit is established in accordance with relevant standards, stipulating that all investigations into allegations of sexual abuse and sexual harassment shall be conducted promptly, thoroughly, and objectively. This applies to all allegations, including those reported by third parties and anonymously. The policy, along with the TDCJ Safe Prisons/PREA Plan, mandates that the agency carry out both administrative and criminal investigations related to incidents of sexual abuse and harassment, with a requirement for investigations to be addressed without delay.

The Ellis Unit is responsible for investigating all allegations of sexual abuse and sexual harassment, which includes third-party and anonymous reports, through administrative channels. Criminal investigations are carried out by the Office of the Inspector General (OIG). The established policy requires that administrative investigations incorporate efforts to assess whether the actions or inactions of staff contributed to incidents of sexual abuse. Investigative reports must document physical evidence, testimonial evidence, the rationale behind credibility assessments, and the facts and findings of the investigation.

Upon learning of an allegation, the OIG is notified immediately. Prompt measures are taken to preserve evidence as the investigation is initiated. The process for investigating third-party allegations follows the same protocols; however, it is necessary to ask the alleged victim whether they wish for the OIG to continue or cease the investigation. This step must be completed before moving forward with the investigation.

	<p>The Safe Prisons/PREA Plan outlines both the criminal and administrative investigation processes. It specifies that all administrative investigations will include an effort to determine whether staff actions or failures to act played a role in the abuse. This must be documented in a written report that includes descriptions of physical and testimonial evidence, explanations for credibility assessments, and the facts and findings of the investigation. In the past twelve months, a total of 15 administrative investigations were conducted. The pre-audit questionnaire and interviews with investigative staff confirm that all investigations will be documented in written reports, encompassing details related to the allegation, interviews with victims and suspects, witness interviews, video evidence (if applicable), descriptions of any physical evidence (if applicable), and investigative facts and findings. A review of the investigations indicates that all requisite information has been included in the investigative files.</p> <p>All administrative investigation records are retained for seven years after closure or termination; while investigations involving offender protection, offender sexual abuse and specific documents such as offender and witness statements within the administrative and criminal investigations are preserved indefinitely.</p> <p>If an allegation is reported anonymously, investigators have confirmed that the investigation will proceed in the same manner as any other investigation. Investigative staff have indicated that they will continue their work even if an inmate is released or a staff member resigns during the investigation. The PREA Compliance Manager stated that investigations will continue to completion, regardless of whether the involved parties leave their positions, are released, or transferred.</p> <p>The PREA Compliance Manager and other unit investigators demonstrate a solid understanding of how to conduct investigations into sexual abuse and sexual harassment in compliance with the standard’s requirements. Ellis unit investigators and OIG investigators have received specialized training in conducting sexual abuse investigations within confinement settings. This was verified by reviewing training records.</p> <p>After a thorough and detailed review of all provided information, the Auditor has determined that the facility meets the requirements of this standard.</p>
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115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses

	<p>3. TDCJ Safe Prisons/PREA Plan</p> <p>4. Specialty Staff Interview Notes</p> <p>5. Informal Conversations with Staff</p> <p>The Ellis Unit policy and TDCJ Safe Prisons/PREA Plan is written in compliance with the requirements of the standard and imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. It was confirmed through multiple staff interviews that Ellis Unit imposes no standard higher than preponderance of the evidence in making determinations. This is documented as a section of the investigator training, which all designated investigators have completed.</p> <p>The PREA Compliance Manager and other unit investigators were able to articulate what preponderance meant and how they arrive at the basis for their determinations. This was confirmed by reviewing policy and interviewing one investigator and the PREA Compliance Manager.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Informal Conversations with Staff 6. Targeted Inmates Interview Notes <p>The Texas Department of Criminal Justice/Ellis Unit operating procedure is written in accordance with the standard and requires an inmate be notified when a sexual abuse allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation. When a staff member has committed sexual abuse against an offender, unless the determination is unfounded, the PREA Compliance Manager or investigator will inform the offender whenever: the allegation has been determined to be unfounded; the allegation has been determined to be</p>

	<p>unsubstantiated; the staff member is no longer posted within the offender's unit; the staff member is no longer employed at the facility; the facility learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or the facility learns that the staff member has been convicted on a charge related to sexual abuse within the facility. This was confirmed by reviewing the policy and the Safe Prisons/PREA Plan and multiple interviews with Ellis Unit leadership.</p> <p>When an offender has alleged sexual abuse by another offender, the PREA Compliance Manager or unit investigator is required to inform the offender whenever: the allegation has been determined to be unfounded; the allegation has been determined to be unsubstantiated; the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the administration learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. This was confirmed while reviewing 15 investigative files.</p> <p>Policy and TDCJ Safe Prisons/PREA Plan dictates that the inmate will be notified by the PREA Compliance Manager or unit investigator. The Auditor verified this process through interviews with the PREA Compliance Manager and the unit Investigator. The agency is responsible for both administrative and criminal investigations notifications. The Warden indicated that inmates are informed of the results of an investigation at the conclusion of the investigation.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Random Staff Interview Notes 6. Informal Conversations with Staff <p>The Texas Department of Criminal Justice/Ellis Unit disciplinary policies were reviewed and are meeting the requirements of the standard. Staff is subject to disciplinary</p>

	<p>sanctions up to and including termination for violating the sexual abuse or sexual harassment policies. Policy and TDCJ Safe Prisons/PREA Plan requires that staff found responsible for sexual abuse of an inmate shall be terminated from employment. Employees who are found to have violated Agency policy related to sexual abuse and harassment, but not actually engaging in sexual abuse shall be disciplined in a manner commensurate with the nature and circumstances of the acts, as well as the previous disciplinary history of the staff and comparable to offenses by other staff with similar disciplinary histories.</p> <p>In accordance with policy, TDCJ notifies law enforcement agencies and relevant licensing bodies when criminal violations of sexual abuse or sexual harassment are committed by staff. Any terminations or resignations by staff who would have been terminated if not for their resignation are reported, unless that activity was clearly not criminal. The Agency's policy requires staff who are terminated or resign in lieu of termination for violating sexual abuse or sexual harassment policies are notified of the agency's responsibility to report such violations to licensing bodies and/or law enforcement agencies.</p> <p>During an interview with the Warden, he stated there have been three staff terminations during the last 12 months, the Agency and the facility has a zero-tolerance policy on any allegations of sexual misconduct, including if staff members are involved. The three staff terminations were also documented within the pre-audit questionnaire. The presumptive discipline for violating the zero-tolerance policy is termination.</p> <p>Informal interviews with facility staff and administrators verified that staff are aware of the disciplinary sanctions for violating the agency's sexual abuse policies and consider a violation of the PREA policy to be of sufficient seriousness to warrant termination and prosecution in accordance with the law. In both formal and informal staff interviews, the staff were aware that the agency has a zero-tolerance policy regarding sexual abuse and any such incidents would be investigated and reported to the appropriate agency for prosecution, if necessary.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses

- 3. Informal Conversations with Staff
- 4. Volunteers Training Records Review
- 5. TDCJ Safe Prisons/PREA Plan
- 6. Specialty Staff Interview Notes
- 7. Volunteer and Contractor Interview Notes

The Texas Department of Criminal Justice/Ellis Unit PREA and disciplinary policies were reviewed and are following the requirements of the standard. Policy stipulates that contractors and volunteers who violate the sexual abuse or sexual harassment policies are prohibited from having contact with inmates and will have their entrance memorandum revoked. The disciplinary sanctions for volunteers or contractors are like those of the disciplinary sanctions for staff members. Policy states if there is an investigation and the individual is determined to have committed acts of sexual abuse or sexual harassment, the case will be referred for criminal prosecution and to any relevant licensing bodies. Additionally, the Agency will take measures to prevent contact from the volunteer or contractor with any offender within the TDCJ system.

The Ellis Unit reported that in the past 12 months, there have been no instances where volunteers or contractors have engaged in sexual abuse or harassment. Random staff verified during targeted interviews that there had been no instances of sexual abuse or harassment by contractors or volunteers in the past 12 months.

Targeted interviews with contracted staff verified that they consider a violation of the PREA policy to be of sufficient seriousness to warrant termination from the facility. The contracted staff during interviews were aware that the Agency has a zero-tolerance policy regarding sexual abuse and any such incidents would be investigated and reported to the appropriate agency for prosecution, if necessary. The Auditor conducted three telephone interviews with volunteers and three in-person interviews with medical contractors. The Volunteers and Contractors all stated they had received training on the PREA rules and were aware of the Agency's zero tolerance policy.

Volunteers and contractors are made aware of the facility's sexual abuse and sexual harassment policies during their initial training and orientation prior to providing services in the facility. Each volunteer and contractor attend training and signs an acknowledgement of understanding for the training, which is retained in their file. The Auditor verified this through training records and file reviews that volunteers and contractors at the facility had received training and reviewed the policies.

After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon to make Compliance Determination:

1. TDCJ Policy and Document Review
2. Pre-Audit Questionnaire Responses
3. TDCJ Safe Prisons/PREA Plan
4. Specialty Staff Interview Notes
5. Site Review Observations
6. Informal Conversations with Staff

The Texas Department of Criminal Justice/Ellis Unit operating procedure directs that inmates are not permitted to engage in non-coercive sexual contact and may be disciplined for such behavior. Policy dictates that staff is prohibited from disciplining an inmate who makes a report of sexual abuse in good faith and based on a reasonable belief the incident occurred, even if the investigation does not establish sufficient evidence to substantiate the allegation. If it is determined that the inmate did commit sexual abuse in the correctional setting, they will be subject to disciplinary sanctions commensurate with the level of the infraction, and other disciplinary sanctions of others with the same or similar infractions. The Auditor reviewed inmate files, inmate records and interviewed random staff, including an interview with the PREA Compliance Manager. There is no evidence to suggest an inmate received a disciplinary charge for making an allegation of sexual abuse or sexual harassment in good faith.

TDCJ/Ellis Unit prohibits sexual activity between inmates. Inmates found to have participated in sexual activity are internally disciplined for such activity. If the sexual activity between inmates is found to be consensual, staff will not consider the sexual activity as an act of sexual abuse. Instances of sexual activity between inmates, if reported to be consensual, are still investigated and each case is taken at face value. This was verified through informal and formal interviews with staff.

TDCJ/Ellis Unit operating procedure states inmates are subject to formal disciplinary action following an administrative finding that they engaged in inmate-on-inmate sexual abuse. According to the submitted PAQ, there have been zero substantiated instances of inmate-on-inmate sexual abuse. Any substantiated reports of inmate-on-inmate abuse would result in a disciplinary charge for the perpetrator. There have been no criminal findings of guilt for inmate-on-inmate sexual abuse in this review period.

According to policy and TDCJ Safe Prisons/PREA Plan, disciplinary action for inmates is proportional to the abuse committed as well as the history of sanctions for similar offenses by other inmates with similar histories. Agency policy requires that staff consider whether an inmate's mental health contributed to their behavior before determining their disciplinary sanctions. There are psychology staff available to

	<p>provide mental health services to the inmates at Ellis Unit. Any decision to offer counseling or therapy to offenders and the initiation of any such counseling or therapy for individuals who have committed sexual offenses would be done at the discretion of the mental health staff in conjunction with a treatment plan for the offender. Psychology staff stated that they would provide services to inmate perpetrators, if requested.</p> <p>Unit policy stipulates that inmates will not be disciplined for sexual contact with staff unless it is substantiated that the staff did not consent. According to documentation provided there were three substantiated staff on inmate sexual assault incidents within the last 12 months; and no inmate discipline related to the incidents. Interviews with staff and inmates confirmed their knowledge of the policy regarding inmates engaging in non-coerced sexual activity.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Informal Conversations with Staff and Inmates 6. Targeted Inmates Interview Notes 7. Site Review Observations <p>The Texas Department of Criminal Justice/Ellis Unit has policies in place that comply with the provisions of this standard. As previously stated under standard 115.41 the medical department does a second screening of the inmates and asks questions relative to sexual victimization as well as sexual abusiveness. If it is found that any inmate has experienced sexual assault in the community or a facility they will be offered and scheduled for an evaluation with a mental health practitioner within 14 days. I confirmed these evaluations with the medical and mental health personnel by reviewing mental health referral notes as well as during the random inmate interviews. The Auditor interviewed five inmates who reported prior sexual</p>

victimization during their risk screening. The inmates told the Auditor that they were provided the opportunity to meet with someone from mental health within 14 days. One inmate added that first meeting happened the first week they arrived at Ellis Unit. The Auditor interviewed the PREA Compliance Manager who is responsible for performing the intake screening. The Auditor was told that all offenders who report prior sexual abuse are offered an appointment with medical and mental health. The referral is then documented in the inmate file. The pre-audit questionnaire indicated that 100% of those inmates who reported prior victimization were seen within fourteen days by medical or mental health. The pre-audit questionnaire also indicated that medical and mental health maintain documents related to compliance with these services. This was further confirmed by reviewing progress note samples and interviewing random staff responsible for risk screenings.

The Ellis Unit ensures any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other need to know staff, if required to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law, as evidenced by the site review checklist.

Medical and mental health practitioners always obtain informed consent from inmates before reporting information about prior sexual victimization not related to the correctional or institutional setting, unless the inmate is under the age of 18. During the onsite phase of the audit, the Auditor interviewed two staff members from the medical department. Both told the Auditor that informed consent was a requirement before they could disclose information to other staff. During the tour, the auditor also observed the area where the risk screening is conducted. The screening is conducted in a private office setting.

After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence relied upon to make Compliance Determination: <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes

	<p>5. Targeted Inmates Interview Notes</p> <p>6. Inmate File Reviews</p> <p>7. Informal Conversations with Staff and Inmates</p> <p>The Texas Department of Criminal Justice/Ellis Unit staff ensure that victims of sexual abuse receive prompt and appropriate medical intervention. The nature and scope are determined by medical and mental health practitioners according to their professional judgment. This was verified through progress note samples and interviews with medical and mental health staff and the PREA Compliance Manager.</p> <p>The Ellis Unit provides 24-hour medical coverage; any inmate involved in a sexual abuse incident would immediately be brought to medical or transported to the local hospital for an evaluation. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders always take preliminary steps to protect the victim pursuant to § 115.62 and will immediately notify the appropriate medical and mental health practitioners, as evidenced by interviews with first responders. This was confirmed during random staff interviews.</p> <p>The policy and TDCJ Safe Prisons/PREA Plan further state that prophylactic treatment and testing is offered to the inmate, as well as follow up care for sexually transmitted or other communicable diseases. An evaluation by a mental health provider is completed for crisis intervention counseling and long term follow up plans. The Auditor reviewed mental health referral dates as part of the verification of evidence.</p> <p>During the onsite phase of the audit, the Auditor interviewed one staff member from the medical department; A contracted registered nurse confirmed that any inmate who was the victim of sexual abuse would be immediately brought to the medical department as part of the coordinated response plan to an allegation of sexual abuse. The first step taken would be to evaluate the inmate for injuries and the urgent need for medical care. Special care would be taken to ensure that any evidence would be preserved. This evaluation is done immediately and is based on the medical professional’s credentials. These policies and procedures were confirmed with the PREA Compliance Manager and mental health staff during interviews. All medical and mental health services related to victim services are 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, as evidenced by facility policy.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon to make Compliance Determination:

1. TDCJ Policy and Document Review
2. Pre-Audit Questionnaire Responses
3. TDCJ Safe Prisons/PREA Plan
4. Specialty Staff Interview Notes
5. Inmate Medical File Reviews
6. Targeted Inmate Interview Notes
7. Informal Conversations with Staff

The Texas Department of Criminal Justice/Ellis Unit staff offer medical treatment and mental health evaluations to all inmates who have been victimized by sexual abuse, as evidenced by policy review staff interviews. The facility provides 24-hour medical coverage, any inmate involved in a sexual abuse incident would immediately be brought to medical for an evaluation or transported to the local hospital for an evaluation. The evaluation and treatment of such victims includes, 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, as evidenced by interviews with medical and mental health staff and random inmates.

TDCJ/Ellis Unit medical and mental healthcare policy is written in accordance with the standard and specifically states that prophylactic treatment and testing is offered to the patient, as well as follow up care for sexually transmitted or other communicable diseases. An evaluation by a mental health provider is completed for crisis intervention counseling and long term follow up plans. Regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident, the services are offered at no financial cost to the inmate. These policies and procedures were confirmed with the medical and mental health staff during interviews and informal interviews with inmates.

TDCJ/Ellis Unit attempts 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. The facility staff provide these victims with medical and mental health services consistent with the community level of care as evidenced by policy, informal discussions and interviews with medical and mental health staff.

After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Investigative File Reviews 6. Informal Conversations with Staff <p>The Ellis Unit has policy in place that outlines the facilities review of sexual abuse and sexual harassment incidents. The policy is written in accordance with all provisions of the standard. Ellis Unit conducts a sexual abuse incident review at the conclusion of every substantiated and unsubstantiated sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded, as evidenced by policy, sexual abuse incident review samples and sexual abuse investigation reviews. A total of 10 incident reviews were conducted within the last 12 months these reviews ordinarily occur within 30 days of the conclusion of the investigation, as evidenced by the Warden and PREA Compliance Manager interview notes.</p> <p>The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners, this was confirmed by reviewing sexual abuse incident review sample forms and an interview with the Warden.</p> <p>As evidenced by sexual abuse incident review samples and interviews with the Warden, PREA Compliance Manager and incident review team members, the review team always (1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; (2) Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; (3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; (4) Assess the adequacy of staffing levels in that area during different shifts; (5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and (6) Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to this section, and any recommendations for improvement and submit such report to the facility head and</p>

	<p>PREA compliance manager.</p> <p>The Ellis Unit utilizes a sexual abuse incident review form, which then becomes part of the investigative file which address all the questions of concern when reviewing an incident. If recommendations are made because of the incident review the facility implements the improvements or document its reasons for not doing so. I confirmed the incident review process during staff interviews and reviewed policy. The PREA Compliance Manger and many department heads were informally interviewed and understood the process for reviewing incidents, documentation requirements and implementation processes that may follow.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Website Review 5. Agency Head Interview Notes 6. Specialty Staff Interview Notes 7. PREA Coordinator Interview Notes 8. TDCJ Agency Audit Report <p>This Standard was audited at the Agency level, the Auditor verified and reviewed all the Agency reported information for accuracy.</p> <p>The Agency has established policies that address all provision of this standard. The Agency utilizes the Sexual Assault Report, which is a data collection instrument utilized to collect all sexual abuse data. The tracking system contains information on all allegations of abuse, neglect and exploitation, and all serious incidents. One of the functions of the PREA Compliance Manager is to maintain this information. The data is also collected from all contracted facilities by the Agency. The Agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, as evidenced by</p>

	<p>policy and the report sample. The Agency aggregates the incident-based sexual abuse data at least annually, as evidenced by the annual PREA report and website review.</p> <p>Incident-based data collected includes the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice, as evidenced by policy and website posted data. The facility maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews, as evidenced by policy and website posted data. A review of the TDCJ Agency website reflects the comprehensive report is published and available to the public for all serious incidents to include sexual abuse and sexual harassment allegations. Compliance was further confirmed through review of completed data collection instruments and an interview with the PREA Coordinator during the Agency audit.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.88	Data review for corrective action
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Agency Head Interview Notes 6. PREA Coordinator Interview Notes 7. Informal Conversations with Staff 8. TDCJ Agency Audit Report <p>This Standard was audited at the Agency level, the Auditor verified and reviewed all the Agency reported information for accuracy.</p> <p>The Agency has policies in place that address all provisions of the standard. As evidenced by the survey of sexual violence reports, annual PREA reports, and interviews with the Agency Head Designee and the PREA Coordinator the Agency reviews all data collected and aggregated pursuant to § 115.87 in order to assess</p>

	<p>and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas; Taking corrective action on an ongoing basis; and Preparing a semi-annual report of its findings and corrective actions for each unit/facility, and the Agency.</p> <p>The report includes a comparison of the current year’s data and corrective actions with those from prior years and provides an assessment of the Agency’s progress in addressing sexual abuse. The PREA Coordinator/Ombudsman’s Office is responsible for the oversight of the reporting process. The Agency’s report is approved by the Agency Head Designee and Executive Management Team and made readily available to the public through the Agency TDCJ website. These tasks are initiated by the Unit Safe Prisons PREA Manager submitting monthly reports to the Safe Prisons PREA Management Office. The Auditor verified this process of data collection through extensive interviews with the Agency Head Designee and the PREA Coordinator/Ombudsman.</p> <p>The Agency does redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted, as evidenced by semi-annual PREA reports on the website and the interview with the PREA Coordinator/Ombudsman.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Informal Conversations with Staff 6. PREA Coordinator Interview Notes 7. Website Review 8. TDCJ Agency Audit Report <p>This Standard was audited at the Agency level, the Auditor verified and reviewed all</p>

	<p>the Agency reported information for accuracy.</p> <p>The Agency has a policy in place that addresses the provisions of this standard. I found that the Agency digitally securely retains all data collected, this data is available to the public through the TDCJ website. The annual reports from 2012 through 2022 are published on the website. All personal identifiers have been removed from the reports. The Agency has a policy in place that maintains all sexual abuse data for at least 10 years from the date received. Staff interviews and review of the annual reports further confirmed this procedure.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. List of Inmates Interviewed 4. Site Review Observations 5. Informal Conversations with Staff and Inmates 6. TDCJ Safe Prisons/PREA Plan 7. Specialty Staff Interview Notes <p>During the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency ensured that each facility operated by the agency is audited at least once, as evidenced by a website review. During each one-year period starting on August 20, 2013, the agency ensured that at least one-third of each facility type operated by the agency is audited, as evidenced by a website review.</p> <p>The auditor had access to, and observed, all areas of the audited facility, as evidenced by the site review checklist. The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information). The Auditor was permitted to conduct private interviews with inmates. Inmates were permitted to send confidential information or correspondence to the</p>

	<p>auditor in the same manner as if they were communicating with legal counsel, as evidenced by the Notice of Audit and observations made during the site review. The auditor received one written letter from inmates related to this facility.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. TDCJ Policy and Document Review 2. Pre-Audit Questionnaire Responses 3. TDCJ Safe Prisons/PREA Plan 4. TDCJ Website Review 5. PREA Coordinator Interview Notes 6. Informal Conversations with Staff <p>The agency has published all final audit reports on their website, this was confirmed by navigating to the page on the website and reviewing all the audit reports.</p> <p>After a careful and detailed review of all the information, the Auditor determined the facility meets the requirements of this standard.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

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

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	na

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

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

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

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

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

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

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

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

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

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

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

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

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	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?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
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)		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes