

PREA Facility Audit Report: Final

Name of Facility: Glossbrenner Unit

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 03/27/2026

| 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: Matthew Taylor | Date of Signature: 03/27/2026 |

| AUDITOR INFORMATION | |
|-------------------------------------|--------------------------|
| Auditor name: | Taylor, Matthew |
| Email: | matthew@preaauditing.com |
| Start Date of On-Site Audit: | 02/04/2026 |
| End Date of On-Site Audit: | 03/06/2026 |

| FACILITY INFORMATION | |
|-----------------------------------|---|
| Facility name: | Glossbrenner Unit |
| Facility physical address: | 5100 South FM 1329, San Diego , Texas - 78384 |
| Facility mailing address: | |

| Primary Contact |
|-----------------|
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|--------------------------|-------------------------------|
| Name: | Megan Williams |
| Email Address: | Megan.Williams@tdcj.texas.gov |
| Telephone Number: | 936-437-3423 |

| Warden/Jail Administrator/Sheriff/Director | |
|---|-------------------------------|
| Name: | Cirildo Puente |
| Email Address: | Cirildo.Puente@tdcj.texas.gov |
| Telephone Number: | 361 279 2705 |

| Facility PREA Compliance Manager | |
|---|------------------------------|
| Name: | Eliza Jimenez |
| Email Address: | eliza.jimenez@tdcj.texas.gov |
| Telephone Number: | 361 279 2705 (088) |

| Facility Health Service Administrator On-site | |
|--|------------------|
| Name: | Audrey Alton |
| Email Address: | Aualton@utmb.edu |
| Telephone Number: | 361 279 2705 |

| Facility Characteristics | |
|--|----------|
| Designed facility capacity: | 612 |
| Current population of facility: | 541 |
| Average daily population for the past 12 months: | 546 |
| Has the facility been over capacity at any point in the past 12 months? | No |
| What is the facility's population designation? | Men/boys |

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|--|------------------|
| Age range of population: | 19-76 |
| Facility security levels/inmate custody levels: | FT SA1, SA2, SA3 |
| Does the facility hold youthful inmates? | No |
| Number of staff currently employed at the facility who may have contact with inmates: | 122 |
| Number of individual contractors who have contact with inmates, currently authorized to enter the facility: | 29 |
| Number of volunteers who have contact with inmates, currently authorized to enter the facility: | 15 |

AGENCY INFORMATION

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|--|--|
| 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: | Bobby Lumpkin |
| Email Address: | Bobby.Lumpkin@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

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

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

Number of standards exceeded:

1

- 115.31 - Employee training

Number of standards met:

36

Number of standards not met:

0

Not audited at the facility level:

Audited at the agency-level, and not relevant to the facility-level audit because the facility has no independent responsibility for the operation of these standards.

8

AGENCY AUDIT FINDINGS

Summary of Audit Findings

These standards were audited at the agency-level. For more information, please see the attached agency audit report found at the end of this document.

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

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

audited.

Number of standards exceeded:

0

Number of standards met:

10

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

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| 1. Start date of the onsite portion of the audit: | 2026-02-04 |
| 2. End date of the onsite portion of the audit: | 2026-03-06 |

Outreach

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| 10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| a. Identify the community-based organization(s) or victim advocates with whom you communicated: | The auditor had successful contact with Just Detention International as a nationwide organization and attempted to make contact with a local rape crisis center in San Diego Texas. |

AUDITED FACILITY INFORMATION

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| 14. Designated facility capacity: | 612 |
| 15. Average daily population for the past 12 months: | 546 |
| 16. Number of inmate/resident/detainee housing units: | 9 |

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| <p>17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?</p> | <p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)</p> |
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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

| | |
|---|------------|
| <p>23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</p> | <p>550</p> |
| <p>25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</p> | <p>0</p> |
| <p>26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</p> | <p>0</p> |
| <p>27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</p> | <p>0</p> |
| <p>28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</p> | <p>0</p> |

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| 29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit: | 1 |
| 30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit: | 4 |
| 31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit: | 1 |
| 32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit: | 0 |
| 33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit: | 28 |
| 34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit: | 0 |
| 35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations): | No text provided. |

| Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit | |
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| 36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit: | 122 |
| 37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees: | 6 |
| 38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees: | 25 |
| 39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit: | No text provided. |
| INTERVIEWS | |
| Inmate/Resident/Detainee Interviews | |
| Random Inmate/Resident/Detainee Interviews | |
| 40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed: | 15 |

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|---|--|
| <p>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p> | <p><input checked="" type="checkbox"/> Age</p> <p><input checked="" type="checkbox"/> Race</p> <p><input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input checked="" type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p> |
| <p>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p> | <p>The auditor received a copy of the facility roster which broke down the population by age, race, ethnicity, length of time in the facility and custody level. This information allowed the auditor to accurately select a random representation of the inmate population from the facility.</p> |
| <p>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p> | <p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> |
| <p>44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p> | <p>It is important to note that this facility is utilized as a release planning program where inmates only reside at the facility for up to 6 months.</p> |
| <p>Targeted Inmate/Resident/Detainee Interviews</p> | |
| <p>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p> | <p>15</p> |

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

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| <p>47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p> | <p>0</p> |
| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |
| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>The facility reported there were no inmates identified as having a physical disability during the onsite portion of the audit. The auditor was able to confirm this information through review of inmate rosters, observations during site review process and interviews conducted with staff at the facility.</p> |
| <p>48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p> | <p>0</p> |

| | |
|--|---|
| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |
| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>The facility reported there were no inmates identified as having a cognitive disability during the onsite portion of the audit. The auditor was able to confirm this information through review of inmate rosters, observations during site review process and interviews conducted with staff at the facility.</p> |
| <p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p> | <p>0</p> |
| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |
| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>The facility reported there were no inmates identified as being blind/low vision during the onsite portion of the audit. The auditor was able to confirm this information through review of inmate rosters, observations during site review process and interviews conducted with staff at the facility.</p> |
| <p>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p> | <p>0</p> |

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|--|---|
| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |
| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>The facility reported there were no inmates identified as being deaf or hard-of-hearing during the onsite portion of the audit. The auditor was able to confirm this information through review of inmate rosters, observations during site review process and interviews conducted with staff at the facility.</p> |
| <p>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p> | <p>1</p> |
| <p>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p> | <p>3</p> |
| <p>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p> | <p>1</p> |
| <p>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p> | <p>0</p> |

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|---|---|
| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |
| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>The facility reported there were no inmates identified as having reported sexual abuse at the facility during the onsite portion of the audit. The auditor was able to confirm this information through review of inmate rosters, observations during site review process and interviews conducted with staff at the facility.</p> |
| <p>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p> | <p>10</p> |
| <p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p> | <p>0</p> |
| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |

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| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>The facility reported there were no inmates identified as being placed in segregated housing for risk of sexual victimization during the onsite portion of the audit. The auditor was able to confirm this information through review of inmate rosters, observations during site review process and interviews conducted with staff at the facility.</p> |
| <p>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p> | <p>No text provided.</p> |
| <p>Staff, Volunteer, and Contractor Interviews</p> | |
| <p>Random Staff Interviews</p> | |
| <p>58. Enter the total number of RANDOM STAFF who were interviewed:</p> | <p>12</p> |
| <p>59. 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 checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p> |
| <p>If "Other," describe:</p> | <p>The auditor interviewed both male and female staff at the facility.</p> |
| <p>60. 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> |

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|--|---|
| <p>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</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>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p> | <p>16</p> |
| <p>63. Were you able to interview the Agency Head?</p> | <p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> |
| <p>64. 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>65. Were you able to interview the PREA Coordinator?</p> | <p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> |
| <p>66. 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> |

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

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

| | |
|---|---|
| | <input type="checkbox"/> Other |
| 68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility? | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| 69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| a. Enter the total number of CONTRACTORS who were interviewed: | 1 |
| b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply) | <input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other |
| 70. Provide any additional comments regarding selecting or interviewing specialized staff. | No text provided. |

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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|--|--|
| 71. Did you have access to all areas of the facility? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| Was the site review an active, inquiring process that included the following: | |
| 72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 75. Informal conversations with staff during the site review (encouraged, not required)? | <input checked="" type="radio"/> Yes <input type="radio"/> No |

| | |
|--|--------------------------|
| <p>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p> | <p>No text provided.</p> |
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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>77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p> | <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> |
|--|--|

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|---|--------------------------|
| <p>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p> | <p>No text provided.</p> |
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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.

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

| | # of sexual abuse allegations | # of criminal investigations | # of administrative investigations | # of allegations that had both criminal and administrative investigations |
|--------------------------------------|--------------------------------------|-------------------------------------|---|--|
| Inmate-on-inmate sexual abuse | 0 | 0 | 0 | 0 |
| Staff-on-inmate sexual abuse | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 0 |

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

0

| | |
|---|--|
| <p>a. Explain why you were unable to review any sexual abuse investigation files:</p> | <p>The facility did not report any allegations of sexual abuse either by inmate-on-inmate or staff-on-inmate during the proceeding 12-months leading up to the audit. This information was also confirmed during interviews with both administrative and criminal investigators.</p> |
| <p>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p> | <p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" 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>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p> | <p>0</p> |
| <p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p> | <p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) </p> |
| <p>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p> | <p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) </p> |
| <p>Staff-on-inmate sexual abuse investigation files</p> | |
| <p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p> | <p>0</p> |

| | |
|--|--|
| <p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p> | <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p> |
| <p>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p> | <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p> |
| <p>Sexual Harassment Investigation Files Selected for Review</p> | |
| <p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p> | <p>1</p> |
| <p>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p> | <p><input 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> |
| <p>Inmate-on-inmate sexual harassment investigation files</p> | |
| <p>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p> | <p>1</p> |
| <p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p> | <p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p> |

| | |
|--|--|
| <p>97. 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> |
| <p>Staff-on-inmate sexual harassment investigation files</p> | |
| <p>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p> | <p>0</p> |
| <p>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p> | <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p> |
| <p>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p> | <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p> |
| <p>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p> | <p>This facility had a very limited number of overall investigations related to sexual abuse or sexual harassment at the facility. This information can be attributed to the custody level and length of stay at the facility which typically was not for more than 6 months before release.</p> |

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

Yes

No

Non-certified Support Staff

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

Yes

No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

The audited facility or its parent agency

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

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

Other

Identify the name of the third-party auditing entity

Corrections Consulting Services

| 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>115.11 Zero Tolerance of Sexual Abuse and Sexual Harassment; PREA Coordinator</p> <p>Document Review</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Executive Directive Safe Prisons Program ED-03.03 · Texas Department of Criminal Justice Safe Prisons PREA Plan · Texas Department of Criminal Justice Board Policy BP-2.09 Prison Rape Elimination Act Ombudsman Policy Statement · Glossbrenner Unit Organizational Chart |

Interviews

- Interview with agency PREA coordinator (ombudsman)
- Interview with facility PREA compliance manager

Findings by Provision

115.11 (a)

The Texas Department of Criminal Justice (TDCJ) has established written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract. The agency's Safe Prisons/PREA Plan and Executive Directive Safe Prisons Program set forth the agency's approach to the prevention, detection, and response to sexual abuse and sexual harassment.

The reviewed policies include definitions of prohibited conduct, sanctions for individuals who engage in prohibited behavior, and agency strategies designed to reduce and prevent incidents of sexual abuse and sexual harassment.

115.11 (b)

TDCJ Board Policy BP-2.09 establishes the PREA Ombudsman as the agency official responsible for coordinating TDCJ's efforts to comply with the PREA standards. The policy provides that the PREA Ombudsman has sufficient time and authority to oversee TDCJ's policies relating to the elimination of sexual abuse and sexual harassment and the implementation of the PREA standards. The policy further reflects that the PREA Ombudsman reports directly to the Texas Board of Criminal Justice, supporting the position's organizational independence and authority.

The interview with the agency PREA Coordinator/Ombudsman confirmed that she has sufficient time to manage PREA-related responsibilities. The Ombudsman reported that, in addition to facility PREA Compliance Managers assigned throughout the agency, her office utilizes regional staff to assist with oversight activities, including site visits and mock audits conducted in coordination with facility staff.

The Ombudsman further reported that when non-compliance is identified, her office initiates corrective action, evaluates the cause of the deficiency, and works with

agency leadership and facility staff to achieve remediation. Based on the policy review and interview findings, the auditor determined the agency has designated an upper-level PREA Coordinator with sufficient time and authority to develop, implement, and oversee agency-wide PREA compliance efforts.

115.11 (c)

At the facility level, the Glossbrenner Unit has designated a PREA Compliance Manager, as reflected on the unit organizational chart. The interview with the facility PREA Compliance Manager indicated that the designated staff member has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.

The facility's organizational structure reflects both agency-level PREA oversight and designated unit-level responsibility for implementation and coordination.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

| 115.12 | Contracting with other entities for the confinement of inmates |
|--------|--|
| | Auditor Overall Determination: Audited at Agency Level |
| | Auditor Discussion |
| | <p>115.12</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Solicitation and Modification of Private Residential Reentry Centers Contracts. · The Texas Department of Criminal Justice Solicitation and Modification of Private Transitional Treatment Centers Contracts |

- The Texas Department of Criminal Justice Solicitation and Modification of Secure Private Facilities Contracts

Interviews:

- Interview with agency contract administrator

Findings by Provision:

115.12 (a)

The Texas Department of Criminal Justice Solicitation and Modification Contract specifically outline the following requirements:

A. Upon award of this contract, the contractor shall obtain PREA compliance for the facilities within (12) months of the service commencement date. The contractor shall maintain compliance with all applicable PREA standards at all times thereafter.

B. The contractor shall comply with the PREA Prison/Jail/Community Confinement Standards and report inmate abuse to the TDCJ-PFCMOD.

C. The contractor shall notify the TDCJ-PFCMOD when a PREA compliance audit is scheduled.

D. The Department designated TDCJ-PFCMOD monitor will monitor the facility to ensure the contractor is compliant with the PREA Prison/Jail/Community Confinement Standards.

E. The contractor shall correct all identified areas of non-compliance in regards to PREA Prison/Jail/Community Confinement Standards deemed applicable and within a time frame determined by the Department or by the date of a Department approved extension.

F. Upon completion of the PREA compliance audit, the contractor shall provide a copy of the initial report and final report to the TDCJ-PFCMOD.

G. All associated fees shall be the contractor's responsibility.

115.12 (b)

The Texas Department of Criminal Justice Solicitation and Modification Contract specifically outline the following requirements:

A. Upon award of this contract, the contractor shall obtain PREA compliance for the facilities within (12) months of the service commencement date. The contractor shall maintain compliance with all applicable PREA standards at all times thereafter.

B. The contractor shall comply with the PREA Prison/Jail/Community Confinement Standards and report inmate abuse to the TDCJ-PFCMOD.

C. The contractor shall notify the TDCJ-PFCMOD when a PREA compliance audit is scheduled.

D. The Department designated TDCJ-PFCMOD monitor will monitor the facility to ensure the contractor is compliant with the PREA Prison/Jail/Community Confinement Standards.

E. The contractor shall correct all identified areas of non-compliance in regards to PREA Prison/Jail/Community Confinement Standards deemed applicable and within a time frame determined by the Department or by the date of a Department approved extension.

F. Upon completion of the PREA compliance audit, the contractor shall provide a copy of the initial report and final report to the TDCJ-PFCMOD.

| | |
|--|--|
| | <p>G. All associated fees shall be the contractor's responsibility.</p> <p>During the audit process, the auditor conducted an interview with the agency's designated contract administrator. The contract monitor was inquired about the agency's monitoring mechanisms for newly and renewed contracts involving confinement services to ascertain compliance with the mandated PREA practices. She clarified that the agency employs contract monitors to oversee compliance with the agency's policies, procedures, and specific PREA practices.</p> <p>The contract administrator has reported that compliance reports for each contract entered into within the past 12 months have been completed.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |
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|---------------|--|
| 115.13 | Supervision and monitoring |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.13 Supervision and Monitoring</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Security Staffing Plan AD-11.52 · Texas Department of Criminal Justice Security Operations Procedures Manual / Turnout Roster Management 08.01 · Texas Department of Criminal Justice Security Operations Annual Review of Turnout Rosters Procedures 08.06 · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Glossbrenner Unit Staffing Plan · Multiple Glossbrenner Unit Participation Statements and Annual Staffing Plan Reviews |

- Texas Department of Criminal Justice PO-07.003
- Texas Department of Criminal Justice PO-07.002
- Texas Department of Criminal Justice PO-07.004
- Texas Department of Criminal Justice PO-07.005
- Examples of Unannounced Rounds
- Shift Roster Examples

Interviews:

- Interview with facility warden
- Interview with the facility PREA compliance manager
- Interview with intermediate and higher-level staff
- Interview with the PREA coordinator / ombudsman

Site Review Observations:

- The auditor observed the number of staff, contractors, and volunteers present (including security and non-security staff) and staffing patterns during every shift.
- The auditor observed staff line of sight and assess whether there are blind spots.
- The auditor observed areas where persons confined in the facility are not allowed to determine whether movement in and out of that space is monitored.
- The auditor observed the level of supervision and frequency of cell checks in housing areas where confined persons are double-celled, in dormitories, or in holding pens with more than one person.
- The auditor observed indirect supervision practices, including camera placement.

Findings by Provision:

115.13 (a)

The Texas Department of Criminal Justice requires each facility it operates to develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against abuse.

During the onsite portion of the audit, the auditor conducted an interview with the facility warden. The warden confirmed that upper-level administrators meet annually and that the following criteria are considered:

- Generally accepted detention and correctional practices;
- Any judicial findings of inadequacy;
- Any inadequacy from internal or external oversight bodies;
- Any findings of inadequacy from Federal investigative agencies;
- All the components of the facility's physical layout (including blind spots);
- Composition of inmate population;
- Number of and placement of supervisory staff;
- Institution programs specific to each shift;
- All applicable State or local laws;
- Prevalence of substantiated and unsubstantiated incidents of sexual abuse;

- Any other relevant factors.

The PAQ reported that the average daily population for the facility has been 546 inmates. The facility also reported that the average daily population for which the staffing plan was predicated was 612.

115.13 (b)

The TDCJ Glossbrenner Unit reported in the PAQ that the six most common reasons for deviating from the staffing plan in the last 12 months were for:

1. Unit to unit transportation
2. Medical transports
3. Medical security
4. Major projects
5. Constant direct observation
6. Crisis management

During the onsite audit, the auditor conducted an interview with the facility warden. The warden confirmed that, in the event of non-compliance with the staffing plan, the facility would document and justify deviations from the plan.

115.13 (c)

At least once every year the facility, in collaboration with the PREA Coordinator, reviews the staffing plan to determine whether adjustments are needed to: (a) the staffing plan, (b) the deployment of monitoring technology, or (c) the allocation of facility or agency resources to commit to the staffing plan and ensure compliance.

During the pre-audit process, this auditor reviewed multiple Glossbrenner Unit Annual Staffing Plan Reviews and multiple Participation Statements.

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| | <p>The auditor also conducted interviews with the facility warden and agency PREA Coordinator / Ombudsman, who confirmed compliance with this provision.</p> <p>115.13 (d)</p> <p>The Texas Department of Criminal Justice requires intermediate-level or higher-level staff to conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The Texas Department of Criminal Justice Safe Prisons/PREA Plan provides guidance to all facilities.</p> <p>The Glossbrenner Unit provided post orders for intermediate-level and higher-level supervisors illustrating the requirement for unannounced rounds on all shifts and the prohibition against alerting staff members.</p> <p>The auditor conducted interviews with intermediate-level and higher-level facility staff confirming compliance with this provision.</p> <p>The Glossbrenner Unit provided documentation of completed unannounced rounds for all shifts at the facility confirming compliance with this provision.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.14 | Youthful inmates |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | 115.14 Youthful Inmates |

Document Review

- Texas Department of Criminal Justice Youthful Inmate Statement of Fact
- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice CYPOM 01.02 Separation of Youth
- Texas Department of Criminal Justice PO-07.140 Champions Youth Program (CYP) Inmate Officer
- Texas Department of Criminal Justice PO-07.141 Youthful Inmate Housing Area Officer
- Texas Department of Criminal Justice PO-07.142 Youthful Inmate Program Captain of Correctional Officers
- Texas Department of Criminal Justice 4.19 Unit Classification Procedure
- Current Inmate Rosters

Site Review Observations

- The auditor observed the entire facility and found no evidence of youthful inmates housed at the facility.

Findings by Provision

115.14 (a) (b) (c)

The Glossbrenner Unit does not accommodate youthful inmates at the facility. This information was corroborated through inmate rosters, site review observations, and informal interviews with staff, the PREA Compliance Manager, and the warden. Based on the documentation reviewed and observations made during the onsite audit, the facility does not house youthful inmates and there was no evidence indicating otherwise.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

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|---------------|--|
| 115.15 | Limits to cross-gender viewing and searches |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.15 Limits to Cross-Gender Viewing and Searches</p> <p>Document Review</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Administrative Directive Searches AD-03.22 · Texas Department of Criminal Justice Gender Specificity Training · Texas Department of Criminal Justice Cross Gender Searches and Log 02.05 · Statement of Fact for Glossbrenner Unit on Cross-Gender Searches and Housing Female Inmates · Texas Department of Criminal Justice Post Order Examples · Texas Department of Criminal Justice In-Service Training Program Training Blocks · Texas Department of Criminal Justice AD-02.22 Utilization of Body Scanners · Texas Department of Criminal Justice Training Records and Database ED-12.10 <p>Interviews</p> <ul style="list-style-type: none"> · Interviews with random staff · Interviews with random inmates <p>Site Review Observations</p> <ul style="list-style-type: none"> · The auditor observed areas used to conduct strip searches, visual body cavity searches, and pat-down searches and assessed whether opposite-gender staff could observe the conduct of a strip search or visual body cavity search absent exigent circumstances. · The auditor observed areas where inmates may be in a state of undress, including shower, toilet, and changing areas, to assess privacy protections and |

supervision practices.

- The auditor observed whether non-medical staff of the opposite gender were able to view inmates in a state of undress, including through mirrors, windows, or camera monitoring.
- The auditor observed the method used to alert inmates when opposite-gender staff entered housing areas where inmates may be in a state of undress and assessed whether the method was timely and effective.

Findings by Provision

115.15 (a)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan and Administrative Directive Searches AD-03.22 prohibit cross-gender strip searches and cross-gender visual body cavity searches except in exigent circumstances or when performed by medical practitioners.

During the onsite audit, the auditor did not observe any practice inconsistent with this requirement.

Interviews with staff and inmates did not identify any indication that cross-gender strip searches or visual body cavity searches were routinely conducted at the Glossbrenner Unit.

115.15 (b)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan and Administrative Directive Searches AD-03.22 do not permit cross-gender pat-down searches of female inmates absent exigent circumstances. The Glossbrenner Unit does not house female inmates. This was corroborated through facility rosters, the statement of fact reviewed by the auditor, and conversations with facility leadership and specialized staff. Based on the documentation and observations reviewed, the facility does not restrict female inmates access to programming or out-of-cell opportunities in order to comply with this provision because female inmates are not housed at the facility.

115.15(c)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan requires that all

cross-gender strip searches and cross-gender visual body cavity searches be documented. The auditor reviewed the agency form used to document cross-gender searches and confirmed that the agency has a mechanism in place to record such searches when they occur. This documentation process supports compliance with the requirement to document any such search conducted under exigent circumstances or by medical practitioners.

115.15(d)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan and Administrative Directive Searches AD-03.22 require that inmates be able to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. The auditor reviewed applicable policy and post orders addressing privacy protections and cross-gender viewing restrictions. During interviews, inmates generally reported that they were able to shower and perform bodily functions with adequate privacy. Staff interviews reflected awareness of privacy expectations and the requirement to afford inmates as much privacy as feasible within the correctional environment. Site review observations similarly did not identify a pattern of inappropriate cross-gender viewing. However, onsite observations noted an area in segregation where posted opposite-gender announcements were recommended, and this observation was considered in evaluating implementation at the facility.

115.15 (e)

In accordance with guidance issued by the Department of Justice, Bureau of Justice Assistance, on December 2, 2025, no compliance determination shall be made in relation to PREA Standard 115.15(e).

115.15 (f)

In accordance with guidance issued by the Department of Justice, Bureau of Justice Assistance, on December 2, 2025, no compliance determination shall be made in relation to PREA Standard 115.15(f).

Compliance Finding: Substantially Compliant

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|--|---|
| | Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard. |
|--|---|

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|---------------|--|
| 115.16 | Inmates with disabilities and inmates who are limited English proficient |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>115.16 Inmates with Disabilities and Inmates who are Limited English Proficient</p> <p>Document Review</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Intake Procedures 6.05 · Texas Department of Criminal Justice Intake Procedures / Initial Orientation 1.10 · Texas Department of Criminal Justice Health Services Liaison Facility Types List · Texas Department of Criminal Justice Inmates with Special Needs G.51.1 · Texas Department of Criminal Justice Referral of Inmates to the Developmental Disabilities Program A-08.03 · Texas Department of Criminal Justice Certified American Sign Language Interpreter Services G-51.5 · Texas Department of Criminal Justice English, Spanish and Braille Inmate Orientation Materials · Texas Department of Criminal Justice Staff Pre-Service Training Modules · Texas Department of Criminal Justice Qualified Spanish Interpreters Guidelines 05.50 <p>Interviews</p> |

- Interviews with random staff
- Interview with the agency head
- Interviews with targeted inmates identified as limited English proficient and inmates with disabilities

Site Review Observations

- The auditor tested the facility's process for securing interpretation services on-demand.
- The auditor determined whether persons confined in the facility were required to self-identify, such as by entering a pin or providing a name or identification number, to access interpretation services.
- The auditor assessed the availability of interpretation services, including the ability to access immediate interpretation services.
- The auditor assessed the accessibility of interpretation services to persons confined in all areas of the facility, including restricted housing.
- The auditor assessed whether interpretation services were provided in a location affording appropriate privacy.
- The auditor visually observed PREA signage in housing areas in English and Spanish and tested on-demand telephone interpretation services through Language Line.

Findings by Provision

115.16 (a)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan provides that the agency shall take appropriate steps to ensure inmates with disabilities, including inmates who are deaf or hard of hearing, blind or low vision, or who have intellectual, psychiatric, or speech 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. The policy further provides that, when necessary to ensure effective communication, the agency shall provide access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. The policy

also requires written materials to be provided in formats or through methods that ensure effective communication with inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision.

The auditor reviewed policies and materials related to intake procedures, initial orientation, inmates with special needs, referrals to the developmental disabilities program, certified American Sign Language interpreter services, and the availability of inmate orientation materials in English, Spanish, and Braille.

During the audit, the auditor interviewed targeted inmates who were identified as limited English proficient and inmates with disabilities to determine whether PREA information regarding zero-tolerance and reporting options had been communicated in a manner they could understand. The inmates interviewed did not express concerns regarding the availability or accessibility of PREA literature or reporting information.

During the site review, the auditor visually observed PREA signage in multiple housing areas in Spanish, the second most commonly spoken language at the facility. The auditor also tested on-demand access to telephone interpretation services through Language Line and confirmed the service was functioning and immediately accessible.

115.16 (b)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan further provides that the agency shall take reasonable steps to ensure meaningful access to all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment for inmates who are limited English proficient, including access to interpreters who can interpret effectively, accurately, and impartially, using any necessary specialized vocabulary.

The auditor reviewed additional policies and documentation pertaining to interpreter guides, print formats, and Braille versions of educational materials available to inmates who are limited English proficient and/or visually disabled. The site review and process testing confirmed that interpretation services were available on demand and could be accessed without unreasonable delay.

115.16 (c)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan prohibits the use of inmate interpreters, inmate readers, or other types of inmate assistants 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.

During the audit, the auditor conducted interviews with a minimum of twelve randomly selected staff members throughout the facility. Staff responses were consistent that inmate interpreters or readers would not be used in the absence of exigent circumstances that would create an extended delay in obtaining an effective interpreter. The information obtained through staff interviews was consistent with the agency's written prohibition and supports compliance with this provision.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

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| 115.17 | Hiring and promotion decisions |
| | Auditor Overall Determination: Audited at Agency Level |
| | Auditor Discussion |
| | <p>115.17 Hiring and Promotion Decisions</p> <p>Document Review</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Executive Directive PD-75 Applicants with Pending Criminal Charges or Prior Criminal Convictions · The Texas Department of Criminal Justice Employment Application Supplement · The Texas Department of Criminal Justice Safe Prisons / PREA Plan · The Texas Department of Criminal Justice Executive Directive PD-56 Request for and Release of Employment Information or Documents · The Texas Department of Criminal Justice Executive Directive PD-71 Selection |

System Procedures

- The Texas Department of Criminal Justice Executive Directive PD-27 Employment Status Pending Resolution of Criminal Charges or Protective Orders
- The Texas Department of Criminal Justice Executive Directive PD-73 Selection Criteria for Correctional Officer Applicants
- Examples of Persons Hired or Promoted in the Past 12-Months

Interviews

- Interview with human resources staff

Findings by Provision

115.17 (a)

The Texas Department of Criminal Justice Executive Directive PD-75, Applicants with Pending Criminal Charges or Prior Criminal Convictions, provides that the agency shall not hire or promote any employee, and shall not enlist the services of any contractor, who may have contact with inmates and who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, coercion, or where the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in such activity.

115.17 (b)

Executive Directive PD-75 further provides that the agency shall consider any incidents of sexual harassment in determining whether to hire or promote any employee, or to enlist the services of any contractor, who may have contact with inmates.

During the onsite portion of the audit, the auditor interviewed a human resources representative assigned to functions relevant to employee screening and hiring practices. The staff member reported that prior incidents of sexual harassment are considered during hiring and promotional decisions, and when evaluating contractors who may have contact with inmates. The information obtained through interview was consistent with the agency's written directive.

115.17 (c)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan provides that, before hiring new employees who may have contact with offenders, the agency shall perform a criminal background records check and shall 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, consistent with Federal, State, and local law.

The auditor reviewed the agency's employment-related directives, the Employment Application Supplement, and examples of persons hired or promoted in the past 12-month period. During interview, the human resources representative confirmed that criminal background checks are completed for new employees and that employment screening practices are conducted in accordance with agency policy.

115.17 (d)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan further requires a criminal background records check before enlisting the services of any contractor who may have contact with offenders.

During the onsite audit, the human resources representative confirmed that criminal background checks are also conducted for contractors who may have contact with inmates, consistent with agency requirements.

115.17 (e)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan provides that criminal background records checks shall be conducted at least every 5 years for current employees and contractors who may have contact with offenders, or that the agency shall have in place a system for otherwise capturing such information on a continuing basis.

The auditor also reviewed Executive Directive PD-27, Employment Status Pending Resolution of Criminal Charges or Protective Orders, which states that Employee Relations conducts a semi-annual background check for each employee once during the month of the employee's birthday and again 180 days later. During the interview, the human resources representative reported that the agency subscribes to T-LETS, a system that provides notification when there is a relevant change to an employee's criminal history status. This information supports a finding that the agency has an ongoing system in place to obtain updated criminal history information for current employees.

115.17 (f)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan requires that all applicants and employees who may have contact with offenders be directly asked about previous misconduct described in this standard in written applications or interviews for hiring or promotion, and in any interviews or written self-evaluations conducted as part of employee reviews. The policy further establishes a continuing affirmative duty for employees to disclose any such misconduct.

The auditor's review of the Employment Application Supplement and related hiring directives supports that the agency directly inquires into disqualifying conduct and imposes a continuing obligation to disclose relevant misconduct.

115.17 (g)

Executive Directive PD-73, Selection Criteria for Correctional Officer Applicants, provides that applicants must furnish required documentation and that the Employment Section of the Human Resources Division verifies the authenticity of submitted documentation. The directive further provides that applicants who provide false or inaccurate information or documentation during the application process shall be disqualified from consideration for a minimum period of 1 year, and that current employees who provide false or inaccurate information or documentation may be subject to disciplinary action.

This directive is consistent with the requirement that material omissions regarding misconduct, or the provision of materially false information, be grounds for termination or other disciplinary action.

115.17 (h)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan provides that, unless prohibited by law, the agency shall 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 the former employee has applied to work.

During the onsite portion of the audit, the human resources representative reported that the agency does provide information on substantiated allegations of sexual abuse or sexual harassment involving former employees when such information is requested by an institutional employer, unless prohibited by law. This practice is also reflected in Executive Directive PD-56, Request for and Release of Employment Information or Documents.

Compliance Finding: Substantially Compliant

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| | Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard. |
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| 115.18 | Upgrades to facilities and technologies |
| | <p>Auditor Overall Determination: Audited at Agency Level</p> <hr/> <p>Auditor Discussion</p> <p>115.18 Upgrades to Facilities and Technology</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Safe Prisons / PREA Plan · The Texas Department of Criminal Justice Video Surveillance System Preventative Maintenance Checklist · The Texas Department of Criminal Justice Video Surveillance System Guidelines <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with agency head and agency head designee <p>Findings by Provision:</p> <p>115.18 (a)</p> <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states when designing or acquiring any new unit and in planning any substantial expansion or modification of existing units, the TDCJ shall consider the effect of the design, acquisition, expansion, or modification on the ability to protect offenders from sexual abuse.</p> <p>Prior to the onsite audit, the auditor conducted interviews with both the agency head and the agency head designee. The auditor engaged in a detailed discussion with the</p> |

agency head regarding compliance with this provision. The agency head reported that the agency had not designed a facility since the 1990s. However, the agency recently secured funding for 5,600 additional beds, which will be strategically placed in existing facilities where staffing capacity is anticipated. The agency head stated the design will adhere to anticipated ACA practices and emphasized the importance of maintaining 100% PREA compliance when these design decisions are made.

The agency head designee reported that the agency conducts assessments of areas where allegations are more likely to occur and evaluates whether environmental or technological modifications may improve offender safety. The designee further stated that the agency is in communication with the information technology division regarding the possible installation of additional cameras in identified areas of concern.

115.18 (b)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan further states that, when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, consideration shall be given as to how the technology may enhance the ability to protect offenders from sexual abuse.

Prior to the onsite audit, the auditor conducted interviews with both the agency head and the agency head designee. The agency head designee reported that the agency maintains a comprehensive video surveillance system in its maximum-security facilities across the state. According to the interview, 23 maximum-security facilities have video surveillance throughout housing areas and other portions of the facility. The designee also reported that body-worn cameras were implemented during the prior year to assist with the investigation and review of allegations and assaults. The designee further stated that some facilities do not currently utilize body-worn cameras but still maintain some form of surveillance technology.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

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| 115.21 | Evidence protocol and forensic medical examinations |
| | Auditor Overall Determination: Meets Standard |

Auditor Discussion

115.21 Evidence Protocol and Forensic Medical Examinations

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Evidence Handling AD-16.03
- Texas Department of Criminal Justice Safe Prisons / PREA Operations Manual 05.01 Sexual Abuse Response and Investigation
- Texas Department of Criminal Justice PREA Solicitation Letter for Inmate Advocacy
- Texas Department of Criminal Justice Inmate Sexual Assault Investigations 7.13
- Texas Department of Criminal Justice Sexual Assault/Sexual Abuse G-57.01
- Texas Department of Criminal Justice Offender Victim Representative Training
- Texas Department of Criminal Justice Inmate Victim Representative Training
- Texas Department of Criminal Justice BP-1.07 Inspector General Policy Statement
- Texas Department of Criminal Justice Statement of Fact / Community Victim Advocate Attempts
- Correctional Managed Health Care Clinic Notes Examples

Interviews:

- Interviews with random staff
- Interview with the facility PREA compliance manager

Findings by Provision:

115.21 (a)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan and Evidence Handling policy outline how the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative

proceedings and criminal prosecutions.

The PAQ reported that criminal investigations are conducted by the Office of the Inspector General.

During the audit, the auditor conducted interviews with at least twelve random staff members throughout the facility. All interviewed staff were able to articulate procedures for preserving and obtaining usable physical evidence and were aware of the agency's coordinated response requirements for incidents of sexual abuse and sexual harassment.

115.21 (b)

The Texas Department of Criminal Justice Inmate Sexual Assault Investigations Policy has developed a protocol appropriate for youth, where applicable, and, 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."

115.21 (c)

The Texas Department of Criminal Justice policies on Inmate Sexual Assault Investigations and Sexual Assault/Sexual Abuse require that all victims of sexual abuse have access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination may be performed by other qualified medical practitioners. The agency documents its efforts to provide SAFEs or SANEs.

According to the information provided in the PAQ, the facility provided zero SAFE/SANE examinations to inmates in the past twelve months.

During the audit, the auditor was unable to interview any inmates who reported sexual abuse at the facility. This information was verified by the auditor through the review of investigations, the review of inmate rosters, and conversations with facility leadership staff.

115.21 (d)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan requires the agency to attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency provides these services through a qualified staff member from a community-based organization or a qualified agency staff member. The agency documents its efforts to secure services from rape crisis centers.

The auditor reviewed documentation demonstrating that the agency attempted to secure the services of a local rape crisis center to provide victim advocacy in response to alleged incidents of sexual abuse. The reviewed documentation further reflected that, as of the audit date, those efforts had been unsuccessful. The facility satisfied the requirement to attempt and document its efforts to secure such services.

The facility also provides training to staff designated to serve in the role of victim advocate. The reviewed training materials demonstrate that staff are provided information and instruction necessary to perform advocacy functions when outside rape crisis center services are unavailable.

During the audit, the facility PREA compliance manager confirmed that the facility has made efforts to establish agreements with local rape crisis centers; however, as of the audit date, those efforts had not resulted in an active agreement. The PREA compliance manager further reported that the facility provides advocacy services through trained staff when outside advocacy services are unavailable.

115.21 (e)

The Texas Department of Criminal Justice Safe Prisons/PREA Operational Manual for Inmate Victim Representatives requires that, if requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

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| | <p>115.21 (f)</p> <p>The Texas Department of Criminal Justice Safe Prisons/PREA Plan, Inmate Sexual Assault Investigations 7.13, and BP-1.07 Inspector General Policy Statement collectively require that the agency follow the applicable provisions of this standard in the handling of allegations of sexual abuse.</p> <p>115.21 (h)</p> <p>Qualified agency staff members who may serve in an advocacy role have been screened for appropriateness and have received education concerning sexual assault and forensic examination issues in general. This was evidenced by the training program and supporting materials provided for staff who may act in this capacity.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with 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>115.22 Policies to Ensure Referrals of Allegations for Investigations</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Office of the Inspector General Inmate Sexual Assault Investigations Policy 7.13 · Texas Department of Criminal Justice Sexual Abuse Response Investigation 05.01 · Texas Department of Criminal Justice Reporting Incidents/Crimes to the Office of the Inspector General AD-16.20 · Texas Department of Criminal Justice Inspector General Policy Statement 01.07 |

- Criminal and Administrative Investigations
- Texas Department of Criminal Justice Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents AD-02.15

Interviews:

- Interview with OIG investigative staff
- Interview with the agency head

Findings by Provision:

115.22 (a)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan, Sexual Abuse Response Investigation 05.01, and Reporting Incidents/Crimes to the Office of the Inspector General AD-16.20 require that administrative or criminal investigations be completed for all allegations of sexual abuse and sexual harassment, including inmate-on-inmate sexual abuse and staff sexual misconduct.

The facility reported in the PAQ that, over the past 12 months, it received 1 allegation of sexual abuse and sexual harassment and that those allegations were investigated either criminally or administratively.

During the agency-level audit, the auditor interviewed the agency head, who reported that criminal investigations are conducted by the Office of the Inspector General, a law enforcement entity overseen by the Board of Criminal Justice, while administrative investigations are typically handled by facility supervisory staff, including sergeants and, in some cases, lieutenants, with the major ensuring documentation is properly maintained.

Additional support was obtained through the follow-up interview with the criminal investigator assigned to the Glossbrenner Unit, who confirmed that allegations are evaluated upon notification and that potentially criminal allegations are referred to the Office of the Inspector General for investigation.

115.22 (b) (c)

The Office of the Inspector General Inmate Sexual Assault Investigations Policy 7.13 and the Texas Department of Criminal Justice Safe Prisons/PREA Plan require that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior.

The agency reported that it does not publish its investigative responsibility policies on the agency website, but that the information is available to the public through an open records request because the agency considers the policies sensitive in nature.

During the audit, the auditor interviewed an Office of the Inspector General criminal investigator, who confirmed that all criminal investigations are referred to the Office of the Inspector General, which possesses the legal authority to investigate such offenses. The investigator further reported that anonymous and third-party reports are handled through the same investigative process and are not treated differently merely because they originate from an alternate reporting source.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

| 115.31 | Employee training |
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| | Auditor Overall Determination: Exceeds Standard |
| | <p>Auditor Discussion</p> <p>115.31 Employee Training</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice On-The-Job Training Program SM-02.25 · Texas Department of Criminal Justice On-The-Job Program Procedures Guide · Texas Department of Criminal Justice Training and Staff Development PD-97 · Texas Department of Criminal Justice Safe Prisons/PREA Plan |

- Texas Department of Criminal Justice Correctional Awareness / Staff Survivor Training
- Texas Department of Criminal Justice Sexual Misconduct with Offenders PD-29
- Texas Department of Criminal Justice Safe Prisons/PREA Program Pre-Service Training
- Texas Department of Criminal Justice Safe Prisons/PREA Program In-Service Supervisor Training
- Texas Department of Criminal Justice Safe Prisons/PREA Plan Unit Safe Prisons / PREA Program Awareness Training 06.01
- Staff Training Examples

Interviews:

- Interviews with random staff

Other Observations:

- Staff training examples

Findings by Provision:

115.31 (a)

The Texas Department of Criminal Justice trains all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment; how to fulfill responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; inmates' rights to be free from sexual abuse and sexual harassment; the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment in confinement; the common reactions of sexual abuse and sexual harassment victims; how to detect and respond to signs of threatened and actual sexual abuse; how to avoid inappropriate relationships with inmates; and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

During the audit, the auditor conducted interviews with at least twelve randomly selected staff members throughout the facility. All individuals confirmed they had received training as outlined in items one through eight of this provision.

The auditor also reviewed staff training records and training modules provided by the facility, which demonstrated compliance with all requirements of this provision.

115.31 (b)

The Texas Department of Criminal Justice training is tailored to the gender of the inmates at the employee's facility. Employees receive additional training if they are reassigned from a facility that houses only female inmates, or vice versa. The auditor reviewed the Safe Prisons/PREA training modules and the On-The-Job Training Program, which illustrated policy compliance with this provision.

115.31 (c)

The Texas Department of Criminal Justice provides each employee with refresher training every year to ensure employees know the agency's current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, the agency provides refresher information on current sexual abuse and sexual harassment policies. This was evidenced by information contained in the Safe Prisons/PREA Program Awareness training.

The facility also reported in the PAQ that employees are required to take refresher training minimally on an annual basis and that refresher information is also provided during shift briefings.

115.31 (d)

The Texas Department of Criminal Justice documents, through employee signature or electronic verification, that employees understand the training they have received. This was illustrated through examples of employee training records provided by the facility.

Compliance Finding: Substantially Exceeds Compliance

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

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| 115.32 | Volunteer and contractor training |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |

115.32 Volunteer and Contractor Training

Document Review:

- Texas Department of Criminal Justice Safe Prisons PREA Plan
- Texas Department of Criminal Justice Safe Prisons Sexual Assault Training Modules
- Texas Department of Criminal Justice Training for Medical and Mental Health Staff
- Texas Department of Criminal Justice Handbook for Volunteers
- Texas Department of Criminal Justice Volunteer Services Training Program / Volunteer Training
- Texas Department of Criminal Justice Safe Prisons/PREA Plan Windham Annual Security Training
- Texas Department of Criminal Justice Sexual Misconduct with Inmates PD-29
- Windham School District WBP-07.56 Prohibited Employee Relationships

Interviews:

- Interviews with contractors who have contact with inmates

Additional Documents Provided by the Facility:

- Training records of volunteers and contractors who have contact with inmates

Findings by Provision:

115.32 (a)

The Texas Department of Criminal Justice ensures 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. This was evidenced by the training policies and, volunteer handbook and provided training modules required of all volunteers and contractors.

During the audit, two contractors were interviewed at the facility. All individuals interviewed confirmed that they are required to undergo training on their responsibilities under the agency's sexual abuse and sexual harassment policies and have successfully completed such training.

The auditor also reviewed training records of volunteers, contractors, and training modules provided by the facility, demonstrating compliance with all the requirements of this provision in its entirety.

The facility provided in the PAQ that there were a total of 44 volunteers and contractors, who may have contact with inmates, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.

115.32 (b)

The Texas Department of Criminal Justice ensures the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

During the audit, one contractor was interviewed at the facility. The individual interviewed confirmed that they are required to undergo training on their responsibilities under the agency's sexual abuse and sexual harassment policies and have successfully completed such training.

115.32 (c)

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| | <p>The Texas Department of Criminal Justice maintains documentation confirming that volunteers and contractors understand the training they have received.</p> <p>The auditor reviewed training records of volunteers and contractors illustrating they understand the training they have received.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.33 Inmate education | |
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| | Auditor Overall Determination: Meets Standard |
| | <p>Auditor Discussion</p> <p>115.33 Inmate Education</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Intake Procedures Initial Orientation 1.10 · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Inmate Sexual Abuse Awareness Training 06.02 · Texas Department of Criminal Justice Glossbrenner Unit Safe Prisons/PREA Information Packet in English and Spanish · Texas Department of Criminal Justice Qualified Spanish Interpreter Guidelines SM-05.50 · Texas Department of Criminal Justice Certified American Sign Language Interpreter Services G-51.5 · Texas Department of Criminal Justice Inmates with Special Needs G.51.01 · Texas Department of Criminal Justice Referrals of Inmates to the Developmental |

Disabilities Program A-08.3

- Inmate Training Participation Examples

Interviews:

- Interviews with intake staff
- Interviews with random inmates

Site Review Observations

- The auditor confirmed who is responsible for conducting the intake process.
- The auditor tested how the facility provides the necessary PREA information to all confined persons, regardless of ability and language, including whether written information is clear, provided at an appropriate reading level, and accessible for confined persons who are limited English proficient, Deaf or hard of hearing, blind or low vision, cognitively or functionally disabled, non-English speaking, or who have limited reading skills. The facility provides interpreters, when needed, to assist Deaf and non-English speaking inmates. Staff are prepared to read written information aloud when necessary, and mental health staff or other skilled educators or staff are involved in providing the required information to inmates with cognitive or functional disabilities.
- The auditor tested the facility's process for securing interpretation services on-demand via Language Line.
- The auditor determined that comprehensive PREA education is provided by both video and in-person. The auditor observed a live comprehensive PREA education session and assessed that the education included the required information outlined in the standards.
- The auditor observed that PREA signage was posted throughout the facility in areas where staff and inmates are able to read and retain the information provided. Signage was available in English and Spanish, and the text size, formatting, and physical placement accommodated most readers, including inmates of average height, inmates with low vision, and inmates who are physically disabled or use a wheelchair.

Findings by Provision:

115.33 (a)

The Texas Department of Criminal Justice ensures inmates receive information at the

time of intake about the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. The Safe Prisons/PREA Plan and Intake Procedures Initial Orientation 1.10 illustrate compliance with this requirement.

The PAQ reported that in the past 12 months, the facility admitted 1013 inmates.

During the audit, the auditor conducted interviews with intake staff at the facility. These interviews explained the PREA education process for inmates arriving at the facility and the process used to educate inmates who transfer from other facilities. Random inmate interviews further supported that inmates had received information regarding reporting methods and the facility's zero-tolerance expectations.

115.33 (b)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan requires that within 30 days of intake, 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 and to be free from retaliation for reporting such incidents, as well as agency policies and procedures for responding to such incidents.

The PAQ reported that over the past 12 months, 910 inmates whose length of stay in the facility was 30 days or more received comprehensive education on their rights to be free from sexual abuse and sexual harassment and retaliation for reporting such incidents, and on agency policies and procedures for responding to such incidents, within 30 days of intake.

During the audit, the auditor conducted interviews with intake staff to ascertain the facility's process for ensuring inmates receive the required comprehensive PREA education. The interviews indicated that the education is provided within the required 30-day timeframe. The auditor also observed a live comprehensive education session and confirmed that PREA education is delivered through both video and in-person instruction.

115.33 (c)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan requires that inmates transferred from one facility to another be educated regarding their rights to be free from sexual abuse and sexual harassment and retaliation for reporting such incidents, and on agency policies and procedures for responding to such incidents, to the extent that the policies and procedures of the new facility differ from those of the previous facility.

During the audit, the auditor conducted interviews with intake staff to gain insight into the facility's process for ensuring that inmates transferred from other facilities receive the necessary PREA educational materials and updated facility-specific

information when applicable.

115.33 (d)

The Texas Department of Criminal Justice provides inmate education in formats accessible to all inmates, including inmates who are limited English proficient, Deaf, visually impaired, otherwise disabled, and inmates who have limited reading skills. The facility provided written guidance for staff to obtain on-demand interpretation services and training materials for inmates who are limited English proficient or otherwise disabled. The Safe Prisons/PREA Plan provides written guidance to staff on serving this inmate population. Site review observations confirmed that PREA materials and signage were available in English and Spanish and that staff demonstrated the ability to access interpretation services when needed.

115.33 (e)

The Texas Department of Criminal Justice maintains documentation of inmate participation in these education sessions through an online agency tracking program. The facility provided inmate training participation examples demonstrating documentation of completed PREA education.

115.33 (f)

The Texas Department of Criminal Justice ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, inmate handbooks, and other written formats. During the site review, the auditor observed PREA signage posted throughout the facility in locations where inmates and staff could reasonably read and retain the information provided.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

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| 115.34 | Specialized training: Investigations |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
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115.34 Specialized Training: Investigations

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Training and Staff Development PD-97
- Texas Department of Criminal Justice Evidence Handling AD-16.03
- Texas Department of Criminal Justice Conducting a Thorough Investigation
- Investigator training records

Interviews:

- Interviews with investigative staff both administrative and criminal

Findings by Provision:

115.34 (a)

The Texas Department of Criminal Justice Safe Prisons/PREA Plan requires that investigations involving allegations of sexual abuse be conducted by investigators who have received specialized training in sexual abuse investigations. This requirement is further reflected in the agency's training and staff development policies. During the onsite portion of the audit, the auditor interviewed 2 investigators, including 1 administrative investigator and 1 criminal investigator. Both investigators confirmed that they had received specialized training in investigating sexual abuse in confinement settings and were able to describe the content of that training.

The criminal investigator interview further corroborated this provision. The investigator confirmed receipt of training specific to sexual abuse investigations in confinement settings and described training topics that included evidence preservation and techniques for interviewing sexual abuse victims. The administrative investigator interview similarly supported that investigators assigned to these cases have received specialized investigative training.

115.34 (b)

The Texas Department of Criminal Justice provided specialized training modules that include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or referral for prosecution. The criminal investigator interview was consistent with the

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| | <p>agency's training materials and reflected familiarity with evidence preservation and victim interviewing expectations applicable to sexual abuse investigations.</p> <p>115.34 (c)</p> <p>The Texas Department of Criminal Justice maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. The PAQ reported there were a total of 6 investigators currently employed by the facility who have completed the required training. Investigator training records and interviews conducted during the audit supported this provision.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.35 | Specialized training: Medical and mental health care |
| | Auditor Overall Determination: Meets Standard |
| | <p>Auditor Discussion</p> <p>115.35 Specialized Training: Medical and Mental Health Care</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Continuing Education/Staff Development C-19.1 · Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual C-25.1 Orientation Training for Health Services Staff · Texas Department of Criminal Justice Training and Staff Development PD-97 · Medical and mental health training records · UTMB Specialized Training for Medical and Mental Health Staff Module |

Interviews:

- Interviews with medical and mental health staff

Findings by Provision:

115.35 (a)

The Texas Department of Criminal Justice requires all full- and part-time medical and mental health care practitioners who work regularly in its facilities to be 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. This is reflected in the Safe Prisons/PREA Plan, Orientation Training for Health Services Staff policies, and Training and Staff Development policies.

The PAQ reported there were a total of 7 medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy.

The PAQ also reported that 100 percent of all medical and mental health care practitioners who work regularly at this facility have received the training required by agency policy.

During the onsite portion of the audit, the auditor conducted interviews with a medical practitioner. This individual interviewed confirmed that they had received specialized training as mandated by this provision.

115.35 (b)

The Glossbrenner Unit does not employ any medical staff at the facility who conduct forensic medical examinations. The facility reported that if there were a need to conduct such examinations, they would be completed at a local hospital.

115.35 (c)

The Texas Department of Criminal Justice maintains documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.

115.35 (d)

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| | <p>The Texas Department of Criminal Justice requires medical and mental health care practitioners to receive the training mandated for employees under § 115.31 or for contractors and volunteers under § 115.32, depending upon the practitioner's status at the agency.</p> <p>This was evidenced by medical and mental health practitioners' training records that were previously reviewed under standards 115.31 and 115.32.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.41 | Screening for risk of victimization and abusiveness |
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| | Auditor Overall Determination: Meets Standard |
| | <p>Auditor Discussion</p> <p>115.41 Screening for Risk of Victimization and Abusiveness</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Safe Prisons/PREA Plan Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness 03.01 · Texas Department of Criminal Justice Safe Prisons/PREA Automated Network System Assessments User Guide <p>Interviews:</p> <ul style="list-style-type: none"> · Interviews with risk screening staff · Interviews with random inmates · Interview with PREA coordinator |

- Interview with PREA compliance manager

Site Review Observations:

- The auditor attended a live risk screening of an inmate at the facility.
- The auditor confirmed the individuals responsible for conducting the risk screening process.
- The auditor assessed that the screening process occurred in a setting that ensured as much privacy as possible given the potentially sensitive information that could be discussed.
- The auditor assessed that screening staff asked screening questions in a manner that fostered comfort and elicited responses.
- The auditor tested the assessment process and confirmed that staff used an objective screening instrument, directly inquired regarding sexual orientation and gender identity, and used additional sources of information to support the assessment and resulting risk determination.
- The auditor observed the physical storage area for hard-copy records collected and maintained pursuant to the PREA standards and observed electronic safeguards used to protect sensitive information maintained electronically.

Findings by Provision:

115.41 (a)

The Texas Department of Criminal Justice requires that all inmates be assessed during intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. This requirement is reflected in the Safe Prisons/PREA Plan.

During the audit, the auditor interviewed staff responsible for the risk screening process. Staff confirmed that all inmates arriving at the Glossbrenner Unit, regardless of their prior housing location, undergo screening to evaluate risk of victimization and abusiveness.

During the onsite portion of the audit, the auditor conducted interviews with a minimum of 30 inmates. Almost all of interviewed inmates recalled undergoing a risk screening process upon arrival, and most of those inmates indicated the screening occurred on the day of arrival.

Based on inmate responses, the auditor reviewed agency records related to inmates who underwent the risk screening process and the dates of those screenings. Additional information obtained through conversations with facility leadership and

specialized staff further supported compliance with this provision.

115.41 (b)

The Texas Department of Criminal Justice requires that the initial intake screening ordinarily take place within 72 hours of arrival at the facility. This requirement is reflected in the Safe Prisons/PREA Plan and the Safe Prisons/PREA Plan Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness 03.01.

The PAQ reported there were a total of 1011 inmates who entered the facility within the last 12 months and whose length of stay was more than 72 hours. The facility reported that 100 percent of 1011 inmates were screened within 72 hours of arrival.

Interviews with risk screening staff confirmed that intake risk screening is conducted within 72 hours of entry into the facility. During the onsite audit, a live screening was observed in a private setting, and interviewed inmates who recalled the process generally reported it occurred on the day of arrival or shortly thereafter. These observations and interviews supported compliance with the timeliness requirement.

115.41 (c)

The Texas Department of Criminal Justice conducts the required risk assessment using an objective screening instrument. The facility provided the screening instrument for review, and the auditor observed staff using the instrument during a live intake screening.

115.41 (d)

The Texas Department of Criminal Justice risk screening process considers, at a minimum, whether the inmate has a mental, physical, or developmental disability; the inmate's age; physical build; prior incarceration history; whether the inmate's criminal history is exclusively nonviolent; prior convictions for sex offenses against an adult or child; prior sexual victimization; the inmate's own perception of vulnerability; whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; and whether the inmate is detained solely for civil immigration purposes.

During the audit, staff responsible for risk screening confirmed that the screening instrument addresses all required factors. During the live demonstration, staff used the objective instrument, asked the required questions, and demonstrated familiarity with the information considered when determining risk.

115.41 (e)

The Texas Department of Criminal Justice risk screening tool also considers prior acts of sexual abuse, prior convictions for violent offenses, and any known history of prior institutional violence or sexual abuse in assessing inmates for risk of being sexually abusive.

115.41 (f)

The Texas Department of Criminal Justice requires that each inmate's risk of victimization or abusiveness be reassessed within a set time period not to exceed 30 days after arrival at the facility, based upon any additional relevant information received since the intake screening. This requirement is reflected in the Safe Prisons/PREA Plan and the Safe Prisons/PREA Plan Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness 03.01.

The auditor interviewed staff responsible for risk screening, who confirmed the requirement to reassess inmates within 30 days. During the onsite portion of the audit, the auditor interviewed a minimum of 30 inmates, most inmates reported receiving a follow-up interview with staff within 30 days of arrival. Based on inmate responses, the auditor reviewed agency records related to reassessment dates and obtained additional information from facility leadership and specialized staff supporting this provision.

115.41 (g)

The Texas Department of Criminal Justice requires that an inmate's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information bearing on the inmate's risk of sexual victimization or abusiveness. This requirement is reflected in the Safe Prisons/PREA Plan and the Safe Prisons/PREA Plan Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness 03.01.

Interviews with staff responsible for risk screening confirmed that reassessments are completed when new information is received or when circumstances warrant additional review.

115.41 (h)

The Texas Department of Criminal Justice prohibits disciplining inmates for refusing to answer, or for not disclosing complete information related to, whether the inmate has a mental, physical, or developmental disability; whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; whether the inmate has previously experienced sexual victimization; or the inmate's own perception of vulnerability. This prohibition is reflected in the Safe Prisons/PREA Plan and the Safe Prisons/PREA Plan Operations Manual Inmate Assessment for Risk of

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| | <p>Victimization or Abusiveness 03.01.</p> <p>During the audit, staff responsible for the screening process confirmed that inmates are not disciplined for declining to answer these questions or for providing incomplete information during the risk screening process.</p> <p>115.41 (i)</p> <p>The PREA coordinator and the facility PREA compliance manager were interviewed regarding access to sensitive information obtained through the risk screening process. Both interviews confirmed that the agency and facility have implemented safeguards to restrict access to authorized staff only. The PREA compliance manager reported that only designated screening staff and facility leadership are authorized to use this information for safety and classification decisions, and electronic access requires password authorization.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.42 | Use of screening information |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.42 Use of Screening Information</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness 03.01 · Texas Department of Criminal Justice Unit Classification Procedure Offender Housing Assignments 4.00 · Texas Department of Criminal Justice Assessment Forms · Texas Department of Criminal Justice Inmate Housing Assignment Criteria and |

Procedures AD 04.17

- Texas Department of Criminal Justice AD-0418 Offender Jobs: Assignments, Job Descriptions, Selection Criteria, Work Programs and Supervision
- Example Documents

Interviews:

- Interview with PREA compliance manager
- Interviews with staff responsible for risk screening
- Interviews with transgender inmates
- Interview with the PREA coordinator

Site Review Observations:

- The auditor observed the facility's classification and housing decision process as discussed with staff responsible for risk screening and with the PREA compliance manager.
- The auditor reviewed how information from the risk screening process was used to support housing, bed, work, education, and program decisions.
- The auditor evaluated whether the facility made individualized determinations designed to ensure inmate safety.

Findings by Provision:

115.42 (a)

The Texas Department of Criminal Justice uses information from the risk screening required by § 115.41 to inform housing, bed, work, education, and program assignments, with the goal of keeping separate inmates at high risk of being sexually victimized from inmates at high risk of being sexually abusive. This is reflected in the Texas Department of Criminal Justice Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Inmate

Assessment for Risk of Victimization or Abusiveness 03.01.

During the audit, the facility's PREA compliance manager was interviewed. The PREA compliance manager described the facility's process for using screening information to support housing and assignment decisions and explained that the facility considers risk information when making decisions involving housing, bed placement, work assignments, education, and program participation.

During the audit, the auditor also interviewed staff responsible for the risk screening process. Those staff described the facility's approach to making individualized determinations intended to ensure the safety of inmates and to separate inmates who may be at high risk of victimization from those who may present a higher risk of abusiveness.

115.42 (b)

The Texas Department of Criminal Justice requires the agency to make individualized determinations about how to ensure the safety of each inmate. This is reflected in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness 03.01.

Interviews with the PREA compliance manager and staff responsible for risk screening supported that the facility does not rely on blanket placement practices and instead uses individualized information obtained during screening and reassessment to support safe placement and assignment decisions.

115.42 (c)

In accordance with guidance issued by the Department of Justice, Bureau of Justice Assistance, on December 2, 2025, no compliance determination shall be made in relation to PREA Standard

115.42 (d)

In accordance with guidance issued by the Department of Justice, Bureau of Justice Assistance, on December 2, 2025, no compliance determination shall be made in relation to PREA Standard

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| | <p>115.42 (e)</p> <p>In accordance with guidance issued by the Department of Justice, Bureau of Justice Assistance, on December 2, 2025, no compliance determination shall be made in relation to PREA Standard)</p> <p>115.42 (f)</p> <p>In accordance with guidance issued by the Department of Justice, Bureau of Justice Assistance, on December 2, 2025, no compliance determination shall be made in relation to PREA Standard</p> <p>115.42 (g)</p> <p>In accordance with guidance issued by the Department of Justice, Bureau of Justice Assistance, on December 2, 2025, no compliance determination shall be made in relation to PREA Standard</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standar</p> |
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| 115.43 | Protective Custody |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.43 Protective Custody</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan |

- Texas Department of Criminal Justice Offender Protection Investigation Attachment
- Texas Department of Criminal Justice Restrictive Housing Plan with Attachments
- Texas Department of Criminal Justice Transient Status Offender AD-04.63

Interviews:

- Interview with the facility warden
- Interviews with staff who supervise inmates in segregated housing

Findings by Provision:

115.43 (a)

The Texas Department of Criminal Justice prohibits the placement of 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. This is illustrated in the Safe Prisons/PREA Plan.

The PAQ reported there were a total of zero inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months awaiting completion of assessment.

During the audit, the auditor conducted an interview with the facility warden, who corroborated that inmates are prohibited by policy from being housed in segregated facilities due to their identification as potential victims of sexual assault.

115.43 (b)

The Texas Department of Criminal Justice requires that inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document: (1) the opportunities that have been limited; (2) the duration of the limitation; and (3) the

reasons for such limitations. These requirements are illustrated in the Safe Prisons/ PREA Plan.

During the audit, the auditor conducted interviews with staff responsible for supervising inmates in segregated housing. Staff confirmed that if an inmate was placed in segregated housing due to a risk of victimization, the inmate would still be provided with the same out-of-cell, work, education, and programming opportunities as other inmates, to the extent feasible depending on the inmate's custody level.

115.43 (c)

The PAQ reported that in the past 12 months the facility had zero inmates at risk of sexual victimization who were assigned to segregated housing for longer than 30 days while awaiting alternative placement.

During the audit, the facility warden was interviewed and confirmed that inmates are only placed in segregated housing until alternative means of separation from potential abusers can be arranged. Inmates are placed in a transient status for very brief periods of time.

The auditor was unable to interview any inmates at the facility who had been placed in segregated housing for risk of sexual victimization. This information was confirmed by the auditor through a review of inmate housing rosters and as part of broader conversations with leadership and specialized staff.

115.43 (e)

The Texas Department of Criminal Justice requires that every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. This is illustrated in the Texas Department of Criminal Justice Restrictive Housing Plan.

The auditor was unable to interview any inmates at the facility who had been placed in segregated housing for risk of sexual victimization. This information was confirmed by the auditor through a review of inmate housing rosters and as part of broader conversations with leadership and specialized staff.

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| | <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.51 | Inmate reporting |
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| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.51 Inmate Reporting</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual · Texas Department of Criminal Justice Board Policy BP-03.91 Uniform Inmate Correspondence Rules · Texas Department of Criminal Justice Executive Directive Prison Rape Elimination Act Complaints and Inquiries ED-02.10 · Texas Department of Criminal Justice BP-01.01 Texas Board of Criminal Justice Responsibilities · Texas Department of Criminal Justice Board Policy Prison Rape Elimination Act Ombudsman Policy Statement BP-02.09 · Texas Department of Criminal Justice Statement of Fact Related to 115.51 · Texas Department of Criminal Justice Executive Directive Sexual Misconduct with Inmates PD-29 · Texas Department of Criminal Justice Inmate Orientation Handbook English and Spanish · Texas Department of Criminal Justice Statement of Fact Related to Civil Immigration |

Interviews:

- Interviews with random staff
- Interviews with random inmates
- Interview with the facility PREA compliance manager

Site Review Observations:

- The auditor observed signage throughout the facility and assessed whether information related to emotional support services, civil immigration, and external reporting was readable, accurate, and consistently posted in English and Spanish.
- The auditor observed the placement of reporting signage throughout the facility to assess whether reporting information was accessible to inmates and staff.
- The auditor tested all available inmate reporting procedures, both verbal and written.
- The auditor assessed the accessibility of writing instruments for inmates and observed how inmate mail moved from housing areas to the mailroom.
- The auditor assessed the security of written communication and the accessibility of mail receptacles.
- The auditor tested a staff person to walk through available staff reporting methods and assessed whether those methods were available on demand and outside the immediate chain of command.

Findings by Provision:

115.51 (a)

The Texas Department of Criminal Justice has established procedures allowing for multiple internal ways for inmates to report privately to agency officials about sexual abuse or sexual harassment, retaliation by other inmates or staff for reporting sexual abuse or sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. These requirements are illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Safe Prisons/PREA

Operations Manual.

During the audit, the auditor conducted interviews with 12 randomly selected staff members throughout the facility. The results revealed that the majority of staff members were able to articulate the various methods inmates have to privately report incidents of sexual abuse and sexual harassment.

During the onsite audit, the auditor conducted interviews with at least 50 inmates. Nearly all interviewed inmates were able to articulate multiple methods for reporting sexual abuse and sexual harassment to the facility or the PREA Ombudsman's Office. The auditor also observed PREA reporting signage positioned in areas within the housing units that inmates regularly observed entering and exiting their housing areas.

115.51 (b)

The Texas Department of Criminal Justice provides at least one way for inmates 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 reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. This requirement is illustrated in the Texas Department of Criminal Justice Executive Directive Prison Rape Elimination Act Complaints and Inquiries and the Texas Department of Criminal Justice Board Policy Prison Rape Elimination Act Ombudsman Policy Statement.

During the audit, the facility's PREA compliance manager was interviewed. The manager outlined the process for inmates to report incidents of sexual abuse and sexual harassment, emphasizing the requirement for anonymity upon request. The reporting mechanism is the PREA Ombudsman's Office, a separate entity within the State of Texas. The manager clarified that this office has the authority to receive and promptly forward allegations to the facility for further investigation.

115.51 (c)

The Texas Department of Criminal Justice requires that staff accept reports made verbally, in writing, anonymously, and from third parties and that staff promptly document any verbal reports. This is illustrated in the Texas Department of Criminal

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| | <p>Justice Executive Directive Sexual Misconduct with Inmates policy and the Safe Prisons/PREA Plan.</p> <p>During the audit, the auditor conducted interviews with 12 randomly selected staff members. All interviewees reported that inmates have the ability to submit reports verbally, in writing, or through third parties. Staff members also emphasized the importance of promptly documenting all verbal reports made by inmates.</p> <p>115.51 (d)</p> <p>The Texas Department of Criminal Justice has established procedures for staff to privately report sexual abuse and sexual harassment of inmates. This is illustrated in the Texas Department of Criminal Justice Executive Directive Sexual Misconduct with Inmates policy and in the Safe Prisons/PREA Operations Manual Unit Safe Prisons/PREA Program Awareness Training.</p> <p>The PAQ reported that staff can privately report outside of their chain of command to the PREA Ombudsman’s Office or the Office of Inspector General.</p> <p>During the audit, the auditor conducted interviews with 12 randomly selected staff members throughout the facility. While most staff members were aware of the existence of a confidential reporting mechanism for allegations of sexual abuse and sexual harassment outside their immediate chain of command, the majority indicated that they would still prefer to report such incidents locally.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.52 | Exhaustion of administrative remedies |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | 115.52 Exhaustion of Administrative Remedies |

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Administrative Directive Management of Inmate Grievances AD-03.82
- Texas Department of Criminal Justice Inmate Grievances BP-03.77
- Texas Department of Criminal Justice Third Party Grievances OGOM-9.00
- Texas Department of Criminal Justice Statement of Fact Exhaustion of Administrative Remedies
- Texas Department of Criminal Justice Third Party Preliminary Investigation Form
- Texas Department of Criminal Justice PREA Allegations IGOM-1.04
- Grievance Examples

Site Review Observations:

- The auditor observed signage throughout the facility can be easily read and accessed by persons in the facility. Specifically, signage related to services, such as emotional support services, civil immigration, and external reporting, included language that detailed what services were available and for what purposes. Signage was provided in English and Spanish.
- The auditor observed whether the information on the signage was accurate and consistent throughout the facility.
- The auditor observed where signage was placed in the facility to assess whether the signage was accessible to staff and inmates and other persons who may need the information or services provided, specifically how to report sexual abuse and sexual harassment.
- The auditor tested all available procedures inmates have available to report instances of sexual abuse and sexual harassment, both verbally and in writing.
- The auditor observed whether the third-party reporting mechanism was posted in public areas of the facility that could be accessed by family members, friends, advocates, and attorneys.
- The auditor tested the third-party reporting mechanism by submitting a test

report through the agency's external website.

- The auditor confirmed the methods to submit third-party reports were easily accessible and understandable and could be found in reasonably conspicuous and appropriate locations.
- The auditor confirmed that the third-party reporting method was not the general contact information for the facility, but was specific to reporting sexual abuse and sexual harassment in the facility.
- The auditor verified the facility has a process for receiving third-party reports.

Findings by Provision:

115.52 (a)

The Texas Department of Criminal Justice has an administrative procedure for dealing with inmate grievances regarding sexual abuse. This is illustrated in the Safe Prisons/PREA Plan, the Texas Department of Criminal Justice Board Policy Inmate Grievances, and the Texas Department of Criminal Justice Administrative Directive Management of Inmate Grievances policies.

115.52 (b)

The Texas Department of Criminal Justice does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. This is illustrated in the Safe Prisons/PREA Plan. Additionally, the agency does not require an inmate to use an informal grievance process, or otherwise attempt to resolve with staff, an alleged incident of sexual abuse. This is also illustrated in the Safe Prisons/PREA Plan.

115.52 (c)

The Texas Department of Criminal Justice allows an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. This requirement is illustrated in the Safe Prisons/PREA Plan.

115.52 (d)

The Texas Department of Criminal Justice requires that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. The agency also requires that the inmate be notified in writing if there are any extensions and provided a date by which a decision will be made. These requirements are illustrated in the Safe Prisons/PREA Plan, the Texas Department of Criminal Justice Board Policy Inmate Grievances, and the Texas Department of Criminal Justice Administrative Directive Management of Inmate Grievances policies.

The PAQ reported that in the last 12 months there was a total of 2 grievances filed by inmates alleging sexual abuse. This information was confirmed through a review of grievance records.

During the onsite portion of the audit, the auditor was unable to interview any inmates that reported sexual abuse at the facility to further illustrate compliance with this provision. This information was confirmed through review of inmate investigation records, a review of inmate rosters and conversations with facility leadership staff.

115.52 (e)

The Texas Department of Criminal Justice permits third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates. Additionally, the agency requires that if an inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the inmate's decision to decline. These requirements are illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Third Party Grievances policy.

The PAQ reported that in the last 12 months there was a total of zero grievances filed by inmates in which the inmate declined third-party assistance, containing documentation of the inmate's decision to decline.

115.52 (f)

The Texas Department of Criminal Justice has established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. This is illustrated in the Safe Prisons/PREA Plan and in the Texas Department of Criminal Justice PREA Allegations policy.

These policies require that after receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the agency shall 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, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

The PAQ reported that over the past 12 months the facility received a total of zero emergency grievances alleging substantial risk of imminent sexual abuse.

115.52 (g)

The Texas Department of Criminal Justice dictates that the agency may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith. This is illustrated in the Texas Department of Criminal Justice Disciplinary Rules and Procedures for Inmates policy and in the Safe Prisons/PREA Plan.

The PAQ reported that in the last 12 months there was a total of zero inmates who filed grievances alleging sexual abuse that resulted in disciplinary action by the agency against the inmate for having filed the grievance in bad faith.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

Auditor Overall Determination: Meets Standard

Auditor Discussion

115.53 Inmate Access to Outside Confidential Support Services

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Inmate Orientation Handbook English and Spanish
- Texas Association Against Sexual Assault Rape Advocacy Centers Directory
- Texas Department of Criminal Justice Uniform Inmate Correspondence Rules BP-03.91
- Texas Department of Criminal Justice Statement of Fact Related to 115.53
- Email Correspondence from the PREA Ombudsman's Office Soliciting Rape Crisis Centers in Texas

Interviews:

- Interviews with random inmates
- Interviews with targeted inmates
- Interview with PREA compliance manager

Site Review Observations:

- The auditor observed signage throughout the facility to assess whether information related to emotional support services, civil immigration, and external reporting was accurate, readable, and consistently posted in English and Spanish.
- The auditor observed where signage was placed in the facility to assess whether information regarding emotional support services and reporting options was accessible to inmates.
- The auditor assessed whether inmates had regular access to phones to contact outside emotional support service providers, including for inmates in restricted

housing, and whether reasonable accommodations were available.

- The auditor assessed how the facility provided access to phones that were unmonitored or otherwise allowed for privacy, and assessed inmate access to outside emotional support services through correspondence by mail.
- The auditor verified that a directory of rape crisis and victim advocacy resources was available in the facility law library.

Findings by Provision:

115.53 (a)

The Texas Department of Criminal Justice requires that inmates be provided 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. The agency further requires reasonable communication between inmates and these organizations in as confidential a manner as possible. These requirements are illustrated in the Safe Prisons/PREA Plan, information contained in the inmate orientation handbook, and the Texas Association Against Sexual Assault Rape Advocacy Centers Directory.

During the audit, the auditor conducted interviews with a minimum of 30 inmates across the facility. Some interviewed inmates reported awareness of ongoing support services available to victims of sexual abuse. However, inmate knowledge of outside emotional support services was inconsistent. Compliance with this provision was primarily supported through document review, site review observations of posted information, verification of resource information in the law library, and broader conversations with facility staff.

The auditor also considered targeted and random inmate interview documentation, which reflected that some inmates were not aware of outside emotional support services, were uncertain whether contact information had been provided, or described internal resources such as Safe Prisons staff, chaplaincy, or mental health services more readily than outside victim advocacy services.

115.53 (b)

The Texas Department of Criminal Justice informs inmates, prior to giving them access to outside support services, of the extent to which such communications will be monitored. Additionally, the facility informs inmates of the mandatory reporting rules governing privacy, confidentiality, and privilege that apply to disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant federal, state, or local law. These requirements are illustrated in the Safe Prisons/PREA Plan, the inmate orientation handbook, and the Statement of Fact related to 115.53.

During the audit, the auditor interviewed at least 30 inmates throughout the facility. Some inmates reported observing signage that referenced ongoing confidential support services. However, inmate understanding of the confidentiality limits and monitoring conditions attached to communications with outside support services was uneven. Most inmates reported receiving or having access to the inmate orientation handbook. Compliance with this provision was therefore supported more strongly by policy, handbook content, and posted information than by consistent inmate recall.

115.53 (c)

Glossbrenner Unit does not currently maintain a memorandum of understanding with a local rape crisis center that provides inmates at the facility with confidential emotional support services related to sexual abuse. However, available documentation reflects that the PREA Ombudsman's Office has solicited rape crisis centers in Texas and that those efforts did not result in a local memorandum of understanding.

Services remain available through the Texas Association Against Sexual Assault Rape Advocacy Centers Directory, which provides victim advocacy resource information. During the onsite portion of the audit, the auditor verified that the directory was available in the facility law library.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

Auditor Overall Determination: Meets Standard

Auditor Discussion

115.54 Third-Party Reporting

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice General Information Guide for Families of Inmates
- Texas Department of Criminal Justice ED-02.10 Prison Rape Elimination Act Complaints and Inquiries
- Texas Department of Criminal Justice ED-02.09 Prison Rape Elimination Act Ombudsman Policy Statement
- Texas Department of Criminal Justice Inmate Orientation Handbook English/Spanish

Site Review Observations:

- The auditor observed signage throughout the facility and assessed whether information regarding services, emotional support services, civil immigration, and external reporting was accurate, readable, and consistently posted in English and Spanish.
- The auditor observed where signage was placed in the facility to assess whether reporting information was accessible to staff, inmates, and other persons who may need the information or services provided.
- The auditor tested all available procedures inmates have available to report instances of sexual abuse and sexual harassment, both verbally and in writing.
- The auditor observed whether the third-party reporting mechanism was posted in public areas of the facility that could be accessed by family members, friends, advocates, and attorneys.
- The auditor tested the third-party reporting mechanism by submitting a test report through the agency's external website.

- The auditor confirmed that the method to submit third-party reports was easily accessible and understandable and could be found in reasonably conspicuous and appropriate locations.
- The auditor confirmed that the third-party reporting method was not general contact information for the facility, but was specific to reporting sexual abuse and sexual harassment in the facility.
- The auditor verified that the facility had a process for receiving third-party reports.

Findings by Provision:

115.54 (a)

The Texas Department of Criminal Justice has established a method to receive third-party reports of sexual abuse and sexual harassment and distributes publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate. This is illustrated by the Safe Prisons/PREA Plan, the Texas Department of Criminal Justice General Information Guide for Families of Inmates, the Texas Department of Criminal Justice ED-02.10 Prison Rape Elimination Act Complaints and Inquiries, the Texas Department of Criminal Justice ED-02.09 Prison Rape Elimination Act Ombudsman Policy Statement, and the Texas Department of Criminal Justice Inmate Orientation Handbook.

During the site review, the auditor observed third-party reporting information posted in public-facing and inmate-accessible areas and tested the agency's external reporting mechanism. The auditor confirmed that the reporting method was specific to sexual abuse and sexual harassment allegations and that the facility had a process for receiving and responding to third-party reports.

During the pre-onsite phase of the audit, the auditor evaluated the agency's third-party reporting mechanism via its external website. The reporting mechanism functioned as intended, with an individual responding to the request within 24 hours of receiving the report. The response outlined the appropriate course of action and the investigative procedures that would have been undertaken had the report been genuine.

Based upon information contained in the PAQ, policies, procedures, site review, and

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| | <p>interviews conducted, the facility is substantially compliant with the requirements of this standard.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.61 | Staff and agency reporting duties |
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| | <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>115.61 Staff and Agency Reporting Duties</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Sexual Misconduct with Inmates PD-29 · Texas Department of Criminal Justice Reporting Incidents/Crimes to the Office of the Inspector General AD-16.20 · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Sexual Abuse Response and Investigation 05.01 · Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual E-35.2 Mental Health Evaluation · Criminal and Administrative Investigations <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with the facility warden · Interview with the agency PREA coordinator / ombudsman |

- Interviews with random staff
- Interviews with medical staff

Site Review Observations:

- The auditor tested staff by having them walk through the staff reporting method(s) provided by the facility.
- The auditor observed the staff reporting method was available, on demand, to all staff in the facility.
- The auditor assessed whether staff are required to report to their direct colleagues or their immediate supervisor.

Findings by Provision:

115.61 (a)

The Texas Department of Criminal Justice requires 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; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. These requirements are illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Sexual Misconduct with Inmates policy.

During the onsite portion of the audit, the auditor conducted interviews with at least 12 random staff members throughout the facility. All interviewed staff members confirmed their awareness of the policy requiring them to report any instances of sexual abuse, sexual harassment, or retaliation to their immediate supervisor.

115.61 (b)

The Texas Department of Criminal Justice, apart from reporting to designated

supervisors or officials, prohibits staff 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. This is illustrated in the Texas Department of Criminal Justice Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Sexual Abuse Response and Investigation policy.

During the audit, the auditor conducted interviews with at least 12 random staff members throughout the facility. All staff members expressed their immediate obligation to report incidents of sexual abuse, sexual harassment, and retaliation. Additionally, they clarified the requirement to report such incidents to their immediate supervisor and the necessity of maintaining confidentiality regarding PREA-related matters.

115.61 (c)

The Texas Department of Criminal Justice requires all medical and mental health practitioners to report sexual abuse and to inform inmates of the practitioner's duty to report and the limitations of confidentiality at the initiation of services.

During the onsite portion of the audit, the auditor conducted interviews with a medical staff member and a mental health staff member. Both staff members confirmed that they provide inmates with explanations regarding the services they offer and their responsibility to report instances of sexual abuse and sexual harassment.

115.61 (d)

Glossbrenner Unit does not house individuals under the age of 18 or those who are considered vulnerable adults. This was verified by direct auditor observations, inmate rosters provided to the audit team, and informal conversations with random staff, the facility warden, and the PREA compliance manager.

115.61 (e)

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| | <p>The Texas Department of Criminal Justice requires all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to be reported to the facility's designated investigators. This requirement is illustrated in the Safe Prisons/PREA Plan policy.</p> <p>During the audit, the auditor conducted an interview with the facility warden. The warden confirmed that all instances of sexual abuse and sexual harassment are promptly reported to both the facility investigators and the Office of Inspector General, regardless of their origin, without exception.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.62 | Agency protection duties |
| | <p>Auditor Overall Determination: Meets Standard</p> |
| | <p>Auditor Discussion</p> <p>115.62 Agency Protection Duties</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Time Frames Associated with Offender Protection Investigations 05.03 · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Intervention Practices 02.04 · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Sexual Abuse Response and Investigation 05.01 · Texas Department of Criminal Justice Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents 02.15 |

Interviews:

- Interview with the facility warden
- Interview with the agency head
- Interviews with random staff

Findings by Provision:

115.62 (a)

The Texas Department of Criminal Justice requires that when the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate. This requirement is illustrated in the Safe Prisons/PREA Plan and the Safe Prisons/PREA Operations Manual Intervention Practices policies.

The PAQ reported there were a total of zero times in the past 12 months that the facility determined that an inmate was subject to a substantial risk of imminent sexual abuse. It also reported the average amount of time that passed before taking action was zero hours.

The PAQ also reported that if the facility became aware of the imminent sexual abuse, the longest time that passed before taking action was up to zero days.

Prior to the audit, the auditor conducted an interview with the agency head and his designee. Both reported that the agency has the capability to implement various measures to ensure the safety of the individuals in question. These measures include transferring the individuals to a different facility, securing them in protective safekeeping, and holding them accountable for their actions. The agency is committed to exploring all available options to prioritize the safety of the individuals in their care.

During the audit, the auditor conducted an interview with the facility warden, who provided an explanation of the facility's response protocol in the event of an

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| | <p>imminent threat of sexual abuse against an inmate.</p> <p>During the audit, the auditor conducted interviews with at least 12 random staff members throughout the facility. All staff members confirmed the facility's coordinated response plan, which was designed to safeguard the inmate and preserve potential evidence.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.63 | Reporting to other confinement facilities |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.63 Reporting to Other Confinement Facilities</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Reporting Allegations of Sexual Abuse to Other Confinement Facilities 04.01 · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Receiving Allegations of Sexual Abuse from an Outside Agency 04.02 · Glossbrenner Unit Statement of Fact · Investigation Samples <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with the facility warden · Interview with agency head |

Findings by Provision:

115.63 (a)

The Texas Department of Criminal Justice requires that upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. This requirement is illustrated in the Safe Prisons/PREA Plan and Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Reporting Allegations of Sexual Abuse to Other Confinement Facilities 04.01 policies.

The PAQ reported that within the last 12 months the facility handled zero allegations where an inmate alleged, they were sexually abused while housed in another facility. The facility also reported that if such an allegation were received, it would follow established policy 04.01.

115.63 (b)

The Texas Department of Criminal Justice requires that notifications to other facilities be provided as soon as possible, but no later than 72 hours after receiving the allegation, and that the notification will be made in writing. This mandate is illustrated in the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Reporting Allegations of Sexual Abuse to Other Confinement Facilities 04.01 policy.

115.63 (c)

The Texas Department of Criminal Justice requires that the facility document that it has provided such notification. This requirement is reflected in the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Reporting Allegations of Sexual Abuse to Other Confinement Facilities 04.01 policy.

115.63 (d)

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| | <p>The Texas Department of Criminal Justice requires that the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards. This is illustrated in the Safe Prisons/PREA Plan policy.</p> <p>The PAQ reported there were a total of zero allegations of sexual abuse the facility received from other facilities within the last 12 months.</p> <p>During the audit, the auditor conducted an interview with the facility warden. The warden provided an overview of the facility's procedures for handling allegations of sexual abuse or sexual harassment from other facilities. He clarified that the facility adheres to the same protocols and investigative process as it does for all PREA allegations.</p> <p>During the agency-level audit, the agency head and designee were interviewed regarding the handling of allegations of sexual abuse or sexual harassment within the facility. Both confirmed that any such allegations reported by another agency would be investigated in the same manner as those reported within the agency.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.64 | Staff first responder duties |
| | Auditor Overall Determination: Meets Standard |
| | <p>Auditor Discussion</p> <p>115.64 Staff First Responder Duties</p> <p>Document Review:</p> |

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Sexual Abuse Response and Investigation 05.01
- Texas Department of Criminal Justice Administrative Directive Evidence Handling AD-16.03

Interviews:

- Interviews with random security staff

Findings by Provision:

115.64 (a)

The Texas Department of Criminal Justice requires that upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to: separate the alleged victim and abuser; preserve and protect any crime scene until appropriate steps can be taken to collect evidence; if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and, if the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence. These requirements are illustrated in the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Sexual Abuse Response and Investigation policy.

The PAQ reported that within the last 12 months the facility handled zero allegations that an inmate was sexually abused.

The PAQ also reported that within the last 12 months there were a total of zero instances when a staff member was notified within a time period that still allowed for the collection of physical evidence.

During the audit, the auditor conducted interviews with at least 12 random staff members throughout the facility. These staff members were selected to assess the ability of staff to articulate the facility's coordinated response to allegations of sexual abuse and sexual harassment. All staff members interviewed demonstrated an understanding of their duties and responsibilities when confronted with allegations of sexual abuse in accordance with this provision.

During the audit, the auditor attempted to conduct interviews with inmates that reported sexual abuse at the facility. The facility reported there were no instances that inmates reported sexual abuse at the facility during the last 12 months. This information was verified by a review of provided investigations and interviews with facility leadership.

115.64 (b)

The Texas Department of Criminal Justice requires that if the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify security staff. This requirement is illustrated in the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Sexual Abuse Response and Investigation policy.

The PAQ reported that over the last 12 months there were a total of zero instances when a non-security staff member was the first responder to an allegation of sexual abuse.

During the audit, the auditor conducted interviews with at least 12 randomly selected staff members throughout the facility. These interviews revealed the facility's response plan for addressing instances of sexual abuse and sexual harassment. Interviewed staff members were able to articulate the required steps of the process in a manner consistent with this provision.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

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| 115.65 | Coordinated response |
| | <p data-bbox="256 188 959 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 300">Auditor Discussion</p> <hr/> <p data-bbox="256 412 683 448">115.65 Coordinated Response</p> <p data-bbox="256 555 523 591">Document Review:</p> <ul data-bbox="256 698 1433 775" style="list-style-type: none"> · Texas Department of Criminal Justice Glossbrenner Unit Coordinated Response Plan <p data-bbox="256 882 416 918">Interviews:</p> <ul data-bbox="256 1025 794 1061" style="list-style-type: none"> · Interview with the facility warden <p data-bbox="256 1169 564 1205">Findings by Provision:</p> <p data-bbox="256 1240 405 1276">115.65 (a)</p> <p data-bbox="256 1384 1474 1585">The Texas Department of Criminal Justice Glossbrenner Unit has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. This is illustrated by the Unit Specific Coordinated Response Plan provided by the facility.</p> <p data-bbox="256 1693 1458 1895">During the audit, the auditor conducted an interview with the facility warden. The warden provided a comprehensive explanation of the facility’s coordinated response plan, which addresses all allegations of sexual abuse and sexual harassment. Additionally, he outlined the specific responsibilities of each entity involved when an inmate reports a PREA-related incident.</p> <p data-bbox="256 2002 890 2038">Compliance Finding: Substantially Compliant</p> |

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| | Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard. |
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| 115.66 | Preservation of ability to protect inmates from contact with abusers |
| | Auditor Overall Determination: Audited at Agency Level |
| | Auditor Discussion |
| | <p>115.66</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Statement of Fact Related to 115.66 <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with agency head and agency head designee <p>Findings by Provision:</p> <p>115.66 (a)</p> <p>The Texas Department of Criminal Justice Statement of Fact related to standard 115.66 states the agency has not entered or renewed any collective bargaining or other agreement. TDCJ does not engage in collective bargaining with staff. Staff are subject to the rules of conduct and other TDCJ policies mandating zero tolerance of all forms of sexual abuse and sexual harassment.</p> |

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| | <p>During the onsite audit, the auditor conducted an interview with the agency head and the agency head designee. The agency head designee reiterated what was written in the statement of fact. The Texas Department of Criminal Justice and the State of Texas is not a collective bargaining State.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |
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| 115.67 Agency protection against retaliation | |
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| | Auditor Overall Determination: Meets Standard |
| | <p>Auditor Discussion</p> <p>115.67 Agency Protection Against Retaliation</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual 90-Day Monitoring for Retaliation 5.08 · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Intervention Practices 02.04 · Texas Department of Criminal Justice PD-29 Sexual Misconduct with Inmates · Review of Investigations that Included Retaliation Monitoring Examples <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with the facility warden · Interview with the agency head · Interviews with staff that monitor retaliation |

Findings by Provision:

115.67 (a)

The Texas Department of Criminal Justice protects 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, and designates staff members and departments responsible for monitoring retaliation. This is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual 90-Day Monitoring for Retaliation policies.

The PAQ reported that the Glossbrenner Unit designates the facility warden, major and PREA compliance manager as the individuals responsible for monitoring retaliation.

115.67 (b) (d)

The Texas Department of Criminal Justice employs 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.

During the audit, the auditor interviewed the facility warden, who confirmed that any form of retaliation against inmates or staff was strictly prohibited. The warden outlined the retaliation monitoring process available to inmates within the facility, which includes regular check-ins extending up to 90 days or more if deemed necessary, unless the investigation is determined to be unfounded.

During the audit, the auditor also conducted an interview with one of the staff members responsible for monitoring retaliation. The interviewee explained the process used to ensure retaliation against inmates is effectively monitored and addressed in accordance with policy. She emphasized the importance of regular meetings with inmates, typically scheduled monthly for a duration of 90 days or longer if deemed necessary.

During the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. This information was confirmed through review of investigation records and interviews with facility leadership.

115.67 (c) (e)

The Texas Department of Criminal Justice for at least 90 days following a report of sexual abuse monitors the conduct and treatment of inmates or staff who reported the sexual abuse and 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, and acts promptly to remedy any such retaliation. The Texas Department of Criminal Justice continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. This is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual 90-Day Monitoring for Retaliation policies.

The PAQ reported that over the last 12 months there have been zero instances of retaliation reported by either inmates or staff.

During the audit, the auditor interviewed the facility warden, who reported that any instances of retaliation by either inmates or staff would be promptly investigated and addressed appropriately.

During the audit, the auditor conducted an interview with a staff member responsible for overseeing retaliation. The retaliation monitor confirmed that monitoring of inmates continues for a minimum of 90 days following a report, unless an incident is deemed unfounded. Furthermore, if retaliation were reported by the alleged victim, appropriate steps would be taken to determine whether retaliation was occurring and to address it promptly.

Prior to the audit, an interview was conducted with the agency head and designee. Both reported that if any individual who cooperates with an investigation expresses fear of retaliation, appropriate steps would be taken to protect that individual.

Compliance Finding: Substantially Compliant

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| | Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard. |
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| 115.68 | Post-allegation protective custody |
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| | <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>115.68 Post-Allegation Protective Custody</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Restrictive Housing Plan · Texas Department of Criminal Justice Protective Safekeeping Plan · Texas Department of Criminal Justice AD-04.63 Transient Status Offenders · Email Dated 10/29/2025 <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with the facility warden · Interviews with staff that supervise inmates in segregated housing <p>Findings by Provision:</p> <p>115.68 (a)</p> <p>The Texas Department of Criminal Justice prohibits the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an</p> |

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. This is evidenced by the Safe Prisons/PREA Plan, the Texas Department of Criminal Justice Restrictive Housing Plan, and the Texas Department of Criminal Justice Protective Safekeeping Plan.

The PAQ reported there were a total of zero inmates who alleged to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for 24 hours awaiting completion of assessment.

The PAQ also reported there were a total of zero inmates who alleged to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement.

During the audit, the facility warden confirmed that inmates are not placed in involuntary segregated housing in lieu of other housing areas. He reported that risk assessments are conducted promptly to ascertain the likelihood of potential abuse. Additionally, he explained the use of transient status for inmates while alternative placement is being determined. The warden further clarified that there had been no recent instances of inmates being placed in involuntary segregation for alleging sexual abuse for any extended period, as any inmates placed in such an environment would have been there only for a very short period.

During the audit, the auditor interviewed a staff member responsible for supervising inmates in segregated housing. The staff member clarified that inmates placed in segregated housing for protection from sexual abuse or due to allegations of sexual abuse retain access to programs, privileges, education, and work opportunities to the extent possible depending on their custody level. The staff member also confirmed that the duration of segregation is limited to a transient status and that, in accordance with policy, an inmate would undergo a placement review every 30 days if such circumstances arose.

During the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. The facility reported no instances of sexual abuse reported during the prior 12 months which was confirmed through a review of investigative files and interviews conducted with facility leadership.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

115.71 Criminal and administrative agency investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

115.71 Criminal and Administrative Agency Investigations

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Administrative Directive Operations of the Emergency Action Center and Reporting Procedures for the Serious or Unusual Incidents AD-02.15
- Texas Department of Criminal Justice Administrative Directive Reporting Incidents / Crimes to the Office of the Inspector General AD-16.20
- Texas Department of Criminal Justice Records Retention Schedule
- Texas Department of Criminal Justice Records Management ED-02.29
- Office of Inspector General Policy 7.13 Inmate Sexual Assault Investigations
- Criminal and Administrative Investigation Samples

Interviews:

- Interviews with investigative staff both criminal and administrative
- Interview with the facility warden
- Interview with the PREA coordinator
- Interview with the PREA compliance manager

Site Review Observations:

- The auditor observed the physical storage area of information and documentation collected and maintained in hard copy pursuant to the PREA standards.
- The auditor observed electronic safeguards of information and documentation collected and maintained electronically pursuant to the PREA standards.

Findings by Provision:

115.71 (a)

The Texas Department of Criminal Justice requires that when it conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. These requirements are illustrated in the Safe Prisons/PREA Plan, Texas Department of Criminal Justice Administrative Directive Reporting Incidents/ Crimes to the Office of the Inspector General, and Texas Department of Criminal Justice Administrative Directive Operations of the Emergency Action Center and Reporting Procedures for the Serious or Unusual Incidents policies.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. Both investigative staff members confirmed that allegations of sexual abuse and sexual harassment are promptly addressed upon receipt. They also outlined the procedure for handling third-party or anonymous reports of sexual abuse and sexual harassment, emphasizing that this process is identical to that employed for any other allegation related to PREA.

115.71 (b)

The Texas Department of Criminal Justice requires that the agency use investigators who have received special training in sexual abuse investigations pursuant to § 115.34. This requirement is illustrated in the Safe Prisons/PREA Plan.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. Both investigators disclosed that they had undergone specialized training in conducting investigations in confinement settings. This training encompassed techniques for interviewing sexual abuse victims, the appropriate use of Miranda and Garrity warnings, the collection of sexual abuse evidence in confinement settings, and the criteria and evidence necessary to substantiate a case for administrative or prosecution referral.

115.71 (c)

The Texas Department of Criminal Justice requires that investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. These requirements are illustrated in the Safe Prisons/PREA Plan.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. Both investigators provided an overview of the process for initiating a criminal or administrative investigation. This process included the prompt commencement of the investigation, conducting interviews, preserving evidence, and compiling a comprehensive and thorough report of their findings.

115.71 (d)

The Texas Department of Criminal Justice requires that when the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. This requirement is illustrated in the Safe Prisons/PREA Plan.

115.71 (e)

The Texas Department of Criminal Justice requires that the credibility of an alleged victim, suspect, or witness be assessed on an individual basis and not be determined by the person's status as inmate or staff. The agency shall not require an inmate who

alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. This requirement is illustrated in the Safe Prisons/PREA Plan.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. Both investigators underscored the importance of conducting credibility assessments for both alleged victims and alleged perpetrators in an investigation. Both investigators clarified that they would never compel an inmate to submit to a polygraph examination or any other truth-telling device as a prerequisite for proceeding with an investigation.

During the onsite portion of the audit, the auditor conducted interviews with inmates who had reported sexual abuse at the facility. All inmates stated that they were not required to submit to a polygraph examination or any other truth-telling device by investigators as a condition of proceeding with an investigation into their allegations of sexual abuse.

115.71 (f)

The Texas Department of Criminal Justice requires that administrative investigations: (1) include an effort to determine whether staff actions or failures to act contributed to the abuse; and (2) be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. These requirements are illustrated in the Safe Prisons/PREA Plan.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. Both investigators outlined their investigative procedures, emphasizing the significance of documenting all investigations in a comprehensive report. This report consistently includes detailed descriptions of both physical and testimonial evidence.

115.71 (g)

The Texas Department of Criminal Justice requires that criminal investigations be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary

evidence where feasible. These requirements are outlined in the Safe Prisons/PREA Plan.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. Both investigators outlined their investigative procedures, emphasizing the significance of documenting all investigations in a comprehensive report. This report consistently includes detailed descriptions of both physical and testimonial evidence.

115.71 (h)

The Texas Department of Criminal Justice requires that substantiated allegations of conduct that appears to be criminal be referred for prosecution. This requirement is outlined in the Safe Prisons/PREA Plan.

The PAQ reported that since the last PREA audit there have been zero substantiated allegations of conduct that appeared to be criminal that were referred for prosecution.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. Both investigators reported that if an investigation was substantiated and it appeared to be criminal in nature, it was referred for criminal prosecution.

115.71 (i)

The Texas Department of Criminal Justice requires that the agency retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus 5 years. These requirements are illustrated in the Texas Department of Criminal Justice Records Management Executive Directive and the Texas Department of Criminal Justice Records Retention Schedule.

115.71 (j)

The Texas Department of Criminal Justice mandates that the departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation. This is illustrated in the Safe Prisons/ PREA Plan.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. Both investigators confirmed that they would be required to conduct an investigation into sexual abuse regardless of whether a staff member terminated employment prior to the conclusion of the investigation.

115.71 (I)

The Texas Department of Criminal Justice requires facility staff to cooperate with outside investigators and to endeavor to remain informed about the progress of the investigation. These requirements are outlined in the Safe Prisons/PREA Plan.

During the onsite portion of the audit, the auditor reviewed 1 administrative investigation. The review process encompassed an assessment of the timely initiation of the investigation, a well-defined investigative process that included the collection of both physical and testimonial evidence, and the preparation of a clear, concise, and comprehensive written report that clearly outlined the investigation's findings and conclusions upon completion.

During the onsite portion of the audit, the auditor conducted an interview with the facility warden. The warden confirmed that when Office of Inspector General investigators conduct a sexual abuse investigation, staff are required by policy to cooperate with the investigators and work to remain informed about the progress of investigations. He also stated that staff work very closely with Office of Inspector General investigators who have offices in the facility.

During the onsite audit, the auditor conducted an interview with the facility's PREA compliance manager. The PREA compliance manager explained that she collaborates closely with the Office of Inspector General regarding criminal investigations of sexual abuse conducted by the facility and emphasized that maintaining close communication regarding cases and their statuses is not an issue.

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| | <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.72 | Evidentiary standard for administrative investigations |
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| | <p>Auditor Overall Determination: Meets Standard</p> |
| | <p>Auditor Discussion</p> |
| | <p>115.72 Evidentiary Standard for Administrative Investigations</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Safe Prisons/PREA Program Conducting a Thorough Investigation · Administrative investigations <p>Interviews:</p> <ul style="list-style-type: none"> · Interviews with investigative staff <p>Findings by Provision:</p> <p>115.72 (a)</p> <p>The Texas Department of Criminal Justice does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. This requirement is illustrated in the Safe Prisons/PREA Plan policy and in the Texas Department of Criminal Justice Safe Prisons/PREA Program Conducting a Thorough Investigation training program.</p> |

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| | <p>During the onsite portion of the audit, the auditor conducted an interview with an administrative investigator who was directly employed at the facility. The investigator provided a comprehensive explanation of the administrative investigative process, which encompassed the collection of both physical and testimonial evidence. Additionally, the investigator informed the auditor that the standard of proof employed in substantiating sexual abuse allegations is the preponderance of the evidence.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.73 | Reporting to inmates |
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| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.73 Reporting to Inmates</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Completing the Inmate Protection Investigation Safe 05.05 · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Reporting Sexual Abuse Criminal Case Status to Offenders 05.10 · Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Completing the Staff-on-Inmate Investigation 05.11 · Texas Department of Criminal Justice Inmate Notification Brochure · Texas Department of Criminal Justice List of Alleged Sexual Abuse Outcomes |

- Investigation Examples

Interviews:

- Interview with the facility warden
- Interviews with investigative staff

Findings by Provision:

115.73 (a)

The Texas Department of Criminal Justice requires that following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, the agency shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This requirement is outlined in the Safe Prisons/PREA Plan, Safe Prisons/PREA Operations Manual Completing the Inmate Protection Investigation, and Safe Prisons/PREA Operations Manual Reporting Sexual Abuse Criminal Case Status to Offenders.

The PAQ reported there were a total of zero criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the facility in the past 12 months.

The PAQ also reported that all zero inmates were notified, verbally or in writing, of the results of the investigation. In the absence of investigations, the auditor requested the facility provide examples from outside the reporting time period to illustrate compliance. The facility provided the auditor with 2 examples of investigations that clearly confirmed that they provided notifications to inmates at the conclusion of completed investigations.

During the audit, the auditor interviewed the facility warden who reported that the facility consistently endeavors to inform inmates of the results of their investigation, provided that the inmates remain in custody.

During the onsite portion of the audit, the auditor conducted interviews with one administrative investigator and one criminal investigator. The administrative investigator informed the auditor that all inmates are provided with notification paperwork and are advised of the investigation's outcome, whether it is substantiated, unsubstantiated, or unfounded.

During the onsite portion of the audit, the auditor was unable to conduct interviews with inmates that reported sexual abuse at the facility. This information was confirmed through a review of investigative files, inmate rosters and through conversations with leadership staff.

115.73 (b)

The Texas Department of Criminal Justice Office of the Inspector General completes criminal investigations related to sexual abuse for the agency. The Office of Inspector General provides information from the investigation to the facility in order to inform the inmate of the outcome. This is evidenced by the example Office of Inspector General notice provided by the facility.

The PAQ reported there was a total of zero investigations that were conducted by the Office of the Inspector General and completed within the last 12 months, but if there had have been any investigations the facility would provide notice from the agency of the outcome of the investigation.

115.73 (c)

The Texas Department of Criminal Justice requires that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate, unless the agency has determined that the allegation is unfounded, whenever: (1) the staff member is no longer posted within the inmate's unit; (2) the staff member is no longer employed at the facility; (3) the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or (4) the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. This is illustrated in the Safe Prisons/PREA Plan and Safe Prisons/PREA Operations Manual Completing the Staff-on-Inmate Investigation policies.

During the onsite review, the auditor examined investigative case files provided by the facility. The lack of investigative case files to reviewed prevented the auditor from clearly observing the process in its entirety. However, the facility did provide examples of cases that were outside the reporting time period to provide examples of how the notification process works and what elements are covered in the paperwork when a staff member is involved.

115.73 (d)

The Texas Department of Criminal Justice requires that following an inmate's allegation that he or she has been sexually abused by another inmate, the agency shall subsequently inform the alleged victim whenever: (1) the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or (2) the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. This is illustrated in the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Completing the Inmate Protection Investigation and Safe Prisons/PREA Operations Manual Reporting Sexual Abuse Criminal Case Status to Offenders policy.

During the onsite portion of the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. The lack of investigative files was confirmed by the auditor through a review of inmate rosters and through conversations with leadership staff.

115.73 (e)

The Texas Department of Criminal Justice requires all notifications or attempted notifications to inmates be documented. This is illustrated in the Safe Prisons/PREA Plan policy and further illustrated by investigation outcome notifications provided by the facility.

The PAQ reported there were a total of 1 notification to inmates that were provided pursuant to this standard and that all notifications were documented.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

115.76 Disciplinary sanctions for staff

Auditor Overall Determination: Meets Standard

Auditor Discussion

115.76 Disciplinary Sanctions for Staff

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Executive Directive General Rules of Conduct and Disciplinary Action Guidelines for Employees PD-22
- Texas Department of Criminal Justice Executive Directive Sexual Misconduct with Inmates PD-29
- Texas Department of Criminal Justice AD-16.20 Reporting Incidents/Crimes to the Office of the Inspector General

Findings by Provision:

115.76 (a)

The Texas Department of Criminal Justice requires that staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. This is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Executive Directive General Rules of Conduct and Disciplinary Action Guidelines for Employees.

115.76 (b)

The Texas Department of Criminal Justice dictates that termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. This is evidenced by information contained in the Texas Department of Criminal Justice Executive Directive General Rules of Conduct and Disciplinary Action Guidelines for Employees.

The PAQ reported that in the past 12 months there has been zero staff members who were terminated or resigned prior to termination for violating agency sexual abuse or sexual harassment policies.

115.76 (c)

The Texas Department of Criminal Justice requires that disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment, other than actually engaging in sexual abuse, shall be 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. This is illustrated in the Texas Department of Criminal Justice Executive Directive General Rules of Conduct and Disciplinary Action Guidelines for Employees.

The PAQ reported that in the past 12 months there has been zero employees from the facility who was disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies.

115.76 (d)

The Texas Department of Criminal Justice requires that 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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. This is illustrated in the Texas Department of Criminal Justice Executive Directive Sexual Misconduct with Inmates.

The PAQ reported that in the past 12 months there has been zero staff members who were reported to law enforcement or licensing boards following termination, or resignation prior to termination, for violating agency sexual abuse or sexual harassment policies.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

115.77 Corrective action for contractors and volunteers

Auditor Overall Determination: Meets Standard

Auditor Discussion

115.77 Corrective Action for Contractors and Volunteers

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Executive Directive Sexual Misconduct with Inmates PD-29

Interviews:

- Interview with the facility warden

Findings by Provision:

115.77 (a)

The Texas Department of Criminal Justice requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with inmates and be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. This is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Executive Directive Sexual Misconduct with Inmates policy.

The PAQ reported that in the past 12 months there have been zero contractors or volunteers reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of inmates.

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| | <p>115.77 (b)</p> <p>The PAQ reported that the facility takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>The PAQ also reported that the facility has had zero instances of this type of conduct from contractors or volunteers.</p> <p>During the audit, the auditor interviewed the facility warden, who explained that a volunteer or contractor would be prevented from entering the facility while an investigation into alleged sexual abuse was pending. The warden indicated that further contact with inmates would be restricted based on the facts and outcome of the investigation.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.78 | Disciplinary sanctions for inmates |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.78 Disciplinary Sanctions for Inmates</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Executive Directive Inmate Disciplinary Procedures ED-03.76 |

- Texas Department of Criminal Justice Disciplinary Rules and Procedures for Inmates English and Spanish
- Administrative Investigation Files

Interviews:

- Interview with the facility warden
- Interviews with medical staff

Findings by Provision:

115.78 (a) (b) (c)

The Texas Department of Criminal Justice dictates that inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. These requirements are illustrated in the Safe Prisons/PREA Plan and in the Texas Department of Criminal Justice Executive Directive Inmate Disciplinary Procedures policy.

The PAQ reported that in the last 12 months there was a total of zero administrative findings of inmate-on-inmate sexual abuse that occurred at the facility.

The PAQ also reported that in the last 12 months there was a total of zero criminal finding of guilt for inmate-on-inmate sexual abuse that occurred at the facility.

During the audit, the auditor conducted an interview with the facility warden. The warden stated that the sanctions imposed on inmates are proportional to the severity and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar backgrounds. Additionally, the warden emphasized that the disciplinary process should evaluate whether an inmate's mental disabilities or mental illness played a role in their behavior when determining the appropriate sanction, if any.

The Texas Department of Criminal Justice requires that the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to the inmate's behavior when determining what type of sanction, if any, should be imposed. This requirement is reflected in the facility's disciplinary process as described by the warden during interview and is consistent with the agency's disciplinary framework.

115.78 (d)

The PAQ reported that the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. Additionally, the facility considers whether to require the inmate to participate in such interventions as a condition of access to programming or other benefits.

The auditor interviewed a medical staff member during the onsite portion of the audit. Medical health staff confirmed the facility offers therapy, counseling, and other interventions to inmates required under this provision. They also confirmed that inmates are not required to participate in these interventions as a condition of access to programming or other benefits.

115.78 (e)

The Texas Department of Criminal Justice dictates that the agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. This is illustrated in the Safe Prisons/PREA Plan.

115.78 (f)

The Texas Department of Criminal Justice prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. This is illustrated in the Safe Prisons/PREA Plan.

115.78 (g)

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| | <p>The Texas Department of Criminal Justice prohibits all sexual activity between inmates and may discipline inmates for such activity. The agency does not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced. This is illustrated in the Texas Department of Criminal Justice Disciplinary Rules and Procedures for Inmates and in the Safe Prisons/PREA Plan.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.81 Medical and mental health screenings; history of sexual abuse | |
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| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>115.81 Medical and Mental Health Screenings; History of Sexual Abuse</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Inmate Assessment for Risk of Victimization or Abusiveness 03.01 · Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Confidentiality and Release of Protected Health Information H-61.1 · Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Mental Health Evaluation E-35.2 · Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Mental Health Appraisal for Incoming Inmates E-35.1 · Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Sexual Assault/Sexual Abuse G57.1 <p>Interviews:</p> |

- Interviews with inmates that disclosed sexual victimization at risk screening
- Interviews with staff responsible for risk screening
- Interview with medical staff

Site Review Observations:

- The auditor observed the physical storage area of any information and documentation collected and maintained in hard copy pursuant to the PREA standards.
- The auditor observed electronic safeguards of any information and documentation collected and maintained electronically pursuant to the PREA standards.

Findings by Provision:

115.81 (a) (c)

The Texas Department of Criminal Justice requires that 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, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. This requirement is illustrated in the Safe Prisons/PREA Plan and Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness policy.

The PAQ reported that within the last 12 months 100 percent of inmates who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner.

During the audit, the auditor conducted interviews with inmates who had reported prior victimization during the risk screening process. Inmates interviewed reported that they had been offered a follow-up meeting with medical or mental health

professionals following their interview.

During the audit, the auditor conducted interviews with staff responsible for the risk screening process. Risk screening staff explained the process for screening inmates and the procedures to follow if an inmate disclosed prior sexual victimization. Staff confirmed that inmates were offered a follow-up appointment with medical and mental health staff.

115.81 (b)

The Texas Department of Criminal Justice requires that if the screening pursuant to § 115.41 indicates that an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. This requirement is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness policy.

The PAQ reported that in the past 12 months 100 percent of inmates who had previously perpetrated sexual abuse, as indicated during screening, were offered a follow-up meeting with a mental health practitioner.

115.81 (d)

The Texas Department of Criminal Justice requires that information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to informing security and management decisions, including treatment plans, housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local law. This is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual Inmate Assessment for Risk of Victimization or Abusiveness policy.

115.81 (e)

The Texas Department of Criminal Justice requires that medical and mental health

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| | <p>practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18. This is illustrated in the Safe Prisons/PREA Plan.</p> <p>The auditor interviewed a medical staff member during the onsite portion of the audit. Interviews conducted illustrated compliance with the requirements of this provision.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.82 | Access to emergency medical and mental health services |
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| | Auditor Overall Determination: Meets Standard |
| | <p>Auditor Discussion</p> <p>115.82 Access to Emergency Medical and Mental Health Services</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Sexual Assault/Sexual Abuse G-57.1 · Texas Department of Criminal Justice Medical and Mental Health Secondary Materials Examples <p>Interviews:</p> <ul style="list-style-type: none"> · Interviews with random staff throughout the facility · Interview with medical staff |

Findings by Provision:

115.82 (a) (b)

The Texas Department of Criminal Justice ensures that 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. This was evidenced by the medical and mental health secondary materials provided by the facility.

During the onsite portion of the audit, the auditor conducted an interview with medical staff. The individual interviewed reported that inmates are provided with immediate and unimpeded access to emergency medical treatment and crisis intervention upon receiving a referral or information from security personnel.

During the onsite portion of the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. This information was confirmed through a review of the limited administrative investigation files, a review of inmate rosters and through conversations with facility leadership staff.

115.82 (c)

The Texas Department of Criminal Justice ensures that inmate victims of sexual abuse while incarcerated shall be 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. This is illustrated in the Safe Prisons/PREA Plan.

During the onsite portion of the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. This information was confirmed through a review of the limited administrative investigation files, a review of inmate rosters and through conversations with facility leadership staff.

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| | <p>During the onsite portion of the audit, the auditor conducted an interview with a medical staff member. The personnel unequivocally reported compliance with this provision.</p> <p>115.82 (d)</p> <p>The Texas Department of Criminal Justice mandates that treatment 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. This is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Correctional Managed Health Care Manual Sexual Assault/Sexual Abuse policy.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.83 | Ongoing medical and mental health care for sexual abuse victims and abusers |
| | <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>115.83 Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Safe Prisons/PREA Plan · Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Receiving, Transfer and Continuity of Care Screening E-32.1 |

- Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Mental Health Appraisal for Incoming Offenders E-35.1
- Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Mental Health Evaluation E-35.2
- Texas Department of Criminal Justice Correctional Managed Health Care Policy Manual Sexual Assault/Sexual Abuse G-57.01
- Texas Department of Criminal Justice Medical and Mental Health Secondary Materials Examples

Interviews:

- Interviews with medical and mental health staff

Findings by Provision:

115.83 (a)

The Texas Department of Criminal Justice requires that 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. This requirement is illustrated in the Safe Prisons/PREA Plan, Correctional Managed Health Care Policy Manual Mental Health Appraisal for Incoming Offenders, Correctional Managed Health Care Policy Manual Mental Health Evaluation, and Correctional Managed Health Care Policy Manual Sexual Assault/Sexual Abuse policies.

115.83 (b) (c)

The Texas Department of Criminal Justice ensures 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. Additionally, the facility provides such victims with medical and mental health services consistent with the community level of care.

During the onsite portion of the audit, the auditor conducted an interview with a medical staff member to assess compliance with these provisions.

During the onsite portion of the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. This information was confirmed through a review of the limited administrative investigation files, a review of inmate rosters and through conversations with facility leadership staff.

115.83 (d)

The Texas Department of Criminal Justice ensures that victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. This requirement is illustrated in the Safe Prisons/PREA Plan and in Correctional Managed Health Care Policy Manual G-57.1. Compliance was also supported through medical secondary materials reviewed at the facility.

115.83 (e)

The Texas Department of Criminal Justice ensures that if pregnancy results from the conduct described in paragraph (d) of this section, such victims will receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services. This requirement was illustrated in Correctional Managed Health Care Policy Manual G-55.1.

The auditor conducted an interview with a medical staff member at the facility, who confirmed compliance with the provisions outlined in this section.

During the onsite portion of the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. This information was confirmed through a review of the limited administrative investigation files, a review of inmate rosters and through conversations with facility leadership staff.

115.83 (f)

The Texas Department of Criminal Justice requires that inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. This is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Correctional Managed Health Care Manual Sexual Assault/Sexual Abuse policy.

During the onsite portion of the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. This information was confirmed through a review of the limited administrative investigation files, a review of inmate rosters and through conversations with facility leadership staff.

115.83 (g)

The Texas Department of Criminal Justice mandates that treatment 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. This is illustrated in the Safe Prisons/PREA Plan and the Texas Department of Criminal Justice Correctional Managed Health Care Manual Sexual Assault/Sexual Abuse policy.

During the onsite portion of the audit, the auditor was unable to interview inmates that reported sexual abuse at the facility. This information was confirmed through a review of the limited administrative investigation files, a review of inmate rosters and through conversations with facility leadership staff.

115.83 (h)

The Texas Department of Criminal Justice attempts to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners. This is illustrated in the Safe Prisons/PREA Plan.

During the onsite portion of the audit, the auditor conducted an interview with a medical staff member to assess compliance with these provisions.

Compliance Finding: Substantially Compliant

Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.

115.86 Sexual abuse incident reviews

Auditor Overall Determination: Meets Standard

Auditor Discussion

115.86 Sexual Abuse Incident Reviews

Document Review:

- Texas Department of Criminal Justice Safe Prisons/PREA Plan
- Texas Department of Criminal Justice Operations of the Emergency Action Center and Reporting Procedures for the Serious or Unusual Incidents AD-02.15
- Texas Department of Criminal Justice Safe Prisons/PREA Operations Manual 02.01
- Investigations of sexual abuse and sexual harassment
- Completed sexual abuse incident reviews

Interviews:

- Interview with facility warden
- Interviews with facility PREA compliance manager
- Interviews with incident review team members

Findings by Provision:

115.86 (a)

The Texas Department of Criminal Justice ensures that all of its facilities 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. The Safe Prisons/PREA Plan, Instructions for Reporting Alleged Sexual Abuse and Sexual Harassment, and the Administrative Directive for Reporting Serious or Unusual Incidents are the policies and procedures all facilities follow for completing sexual abuse incident reviews.

The PAQ reported that in the past 12 months, the facility completed zero criminal and/or administrative investigations of sexual abuse, excluding unfounded incidents.

115.86 (b)

The Texas Department of Criminal Justice requires that all sexual abuse incident reviews ordinarily occur within 30 days of the conclusion of the investigation.

The auditor had limited examples of investigations to review at the facility to ascertain whether sexual abuse incident reviews were conducted in compliance with the requirements of this provision. Compliance was determined based on interviews conducted with a member of the sexual abuse incident review team and through interviews with facility leadership staff.

The PAQ reported that in the past 12 months there were a total of zero criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days.

115.86 (c)

The Texas Department of Criminal Justice requires that the review team consist of upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. The Safe Prisons/PREA Operational Manual specifically outlines who the review team consists of.

During the audit, the auditor interviewed the facility warden, who confirmed the

existence of a sexual abuse incident review team within the facility. The review team's composition was verified to align with the provisions outlined in this document.

115.86 (d)

The Texas Department of Criminal Justice requires that the sexual abuse incident 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; examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and prepare a report of its findings, including, but not necessarily limited to, determinations made pursuant to 115.86 (d)(1) through (d) and any recommendations for improvement, and submit such report to the facility head and PREA compliance manager.

During the audit, the facility warden was interviewed. He outlined a consistent process that is completed at the conclusion of each criminal or administrative sexual abuse investigation. The warden explained how the facility utilizes the information gathered from the incident review to identify potential barriers and enhance video monitoring technology. Additionally, he confirmed that a written electronic report of the team's findings is completed at the end of each sexual abuse investigation.

During the audit, the auditor conducted an interview with the facility's PREA compliance manager. The compliance manager confirmed that the facility conducts a sexual abuse incident review at the conclusion of each sexual abuse investigation. Additionally, she confirmed that the facility submits an electronic report for review by her and the facility warden. This report includes any recommendations for changes that may be necessary to enhance the facility's sexual safety measures.

During the audit, the auditor conducted an interview with a staff member who was a member of the facility's sexual abuse incident review team. The incident review team member provided an explanation of the sexual abuse incident review process and confirmed that all requirements outlined in this provision were being met.

115.86 (e)

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| | <p>The Texas Department of Criminal Justice requires that each of its facilities implement the recommendations for improvement, or document its reasons for not doing so, as part of the sexual abuse incident review process.</p> <p>The auditor endeavored to scrutinize instances of sexual abuse incident reviews submitted by the facility. However, due to the limited number of actual sexual abuse investigations conducted by the facility, a comprehensive compliance determination based solely on examples was not feasible. Compliance was instead determined through interviews conducted with facility leadership staff and a member of the sexual abuse incident review team.</p> <p>Compliance Finding: Substantially Compliant</p> <p>Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the facility is substantially compliant with this standard.</p> |
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| 115.87 | Data collection |
| | Auditor Overall Determination: Audited at Agency Level |
| | <p>Auditor Discussion</p> <p>115.87</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Safe Prisons / PREA Plan · The Texas Department of Criminal Justice Administrative Directive AD-02.15 Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents · The Texas Department of Criminal Justice Data Collection Instrument · The Texas Department of Criminal Justice Emergency Action Center Notification Handbook |

· 2023 Annual Survey of Sexual Victimization Summary Form

Findings by Provision:

115.87 (a)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states accurate, uniform data shall be collected for every incident of sexual abuse alleged to have occurred at a TDCJ operated facility using a standardized instrument and set of definitions.

The Texas Department of Criminal Justice Administrative Directive AD-02.15 Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents, provides the set of definitions required under this provision.

115.87 (b)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states Incident-based sexual abuse data shall be aggregated at least annually.

The auditor reviewed examples provided by the agency of aggregated data collected illustrating further compliance with this provision.

115.87 (c)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states the incident-based data collected shall include, at a minimum, information necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.

The auditor also reviewed the data collection instrument utilized by the agency which is called SPPANS Database. The auditor ensured that the information collected in the instrument minimally captured information necessary to answer all the questions in

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| | <p>the Survey of Sexual Victimization.</p> <p>115.87 (d)</p> <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews shall be maintained, reviewed, and collected as needed to complete the SSV.</p> <p>115.87 (e)</p> <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states Aggregated sexual abuse data, from all TDCJ operated facilities, including privately contracted facilities, shall be readily available to the public at least annually, through a website or other means.</p> <p>115.87 (f)</p> <p>The Texas Department of Criminal Justice reported in the PAQ that the Department of Justice did not request data from the agency from the previous calendar year.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |
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| 115.88 | Data review for corrective action |
| | Auditor Overall Determination: Audited at Agency Level |
| | Auditor Discussion |
| | 115.88 |

Document Review:

- The Texas Department of Criminal Board Policy BP-02.09 Prison Rape Elimination Act Ombudsman Policy Statement
- The Texas Department of Criminal Justice Safe Prisons / PREA Program Annual Report for 2023
- The Texas Department of Criminal Justice Safe Prisons / PREA Plan

Interviews:

- Interview with agency head and agency head designee
- Interview with agency PREA Coordinator / Ombudsman

Findings by Provision:

115.88 (a)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states the TDCJ shall review data collected pursuant to Section VII.A of this plan in order to assess and improve the effectiveness of the sexual abuse prevention, detection, and response policies, procedures, and training by:

- a. Identifying problematic areas;
- b. Taking corrective action on an ongoing basis; and
- c. Preparing an annual report of findings and corrective actions for each unit, as well as the TDCJ as a whole, in collaboration with the OIG and PREA ombudsman.

The Texas Department of Criminal Justice Board Policy BP-02.09 Prison Rape

Elimination Act Ombudsman Policy Statement also states the PREA ombudsman's responsibilities include the following:

1. Monitor TDCJ policy for the prevention of sexual abuse and sexual harassment of inmates at correctional facilities, as well as individuals at community residential facilities, and compliance with PREA ombudsman policies and procedures to assure PREA compliance.
2. Provide oversight of education and training for employees, inmates, and other individuals assuring the curriculum and trainers cover topics required in the PREA standards to include specific topics and information, and serve as a subject matter expert regarding training.
3. Make recommendations to TDCJ executive management concerning changes in policies and procedures necessary to comply with PREA standards.
4. Process complaints and inquiries from elected officials, the public, and inmates concerning sexual abuse and sexual harassment and TDCJ initiatives related to PREA and ensure impartial resolution. The PREA ombudsman may use discretion to respond directly or forward complaints to appropriate TDCJ staff for investigation and disposition. Criminal investigations are the responsibility of the Office of the Inspector General (OIG).
5. Oversee the administrative investigation of allegations of sexual abuse and sexual harassment to assure quality and thorough investigations.
6. Collect statistics regarding allegations of sexual abuse and sexual harassment from each correctional facility to comply with PREA standards.
7. Prepare monthly and semiannual activity reports for distribution to the TBCJ chairman, TBCJ members, and TDCJ executive management. 8. Ensure the TBCJ chairman and TDCJ executive management are informed of any problematic, systemic trends.

During the onsite audit, the auditor conducted interviews with the agency head and

the agency head designee. The auditor inquired about the agency's use of incident-based sexual abuse data to assess and enhance sexual abuse prevention detection and response policies and practices. The agency head designee informed the auditor that the Texas Department of Criminal Justice (TDCJ) collaborates closely with the PREA ombudsman to collect all pertinent data associated with reports of sexual abuse and sexual harassment. The designee further stated that all TDCJ facilities collect incident-based data and aggregate it for the PREA ombudsman's office to develop corrective action response plans tailored to the assessed needs.

During the onsite audit, the auditor conducted an interview with the agency's PREA coordinator and ombudsman. The auditor inquired about the agency's data collection and aggregation practices for assessing and improving the effectiveness of its sexual abuse prevention, detection, and response policies. The coordinator reported that the agency diligently collects sexual abuse and sexual harassment data from all its facilities, which is securely retained in a specific agency database accessible only to authorized staff. This data is aggregated, and patterns and problem areas are identified through this process. The coordinator also mentioned that PREA audit reports are reviewed to identify any deficiencies. All this information is utilized to determine if there is a need to modify or update policies and procedures to enhance sexual safety in the facilities. Additionally, the coordinator indicated that her office is responsible for the PREA portion of the annual report, which is highly comprehensive.

115.88 (b)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states the annual report shall include a comparison of the data and corrective actions from the current year with those from prior years and shall provide an assessment of the progress made in addressing sexual abuse.

The auditor also reviewed the provided Texas Department of Criminal Justice Safe Prisons / PREA Program Annual Report for 2023. The report provided includes a comparison of the current year's data and corrective actions with those from prior years. Additionally, the annual report provides an assessment of the agency's progress in addressing sexual abuse.

115.88 (c)

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| | <p>The Texas Department of Criminal Justice provided a web link in the PAQ where a copy of the most recent annual report was publicly available for review. The annual report was also reviewed and approved by the agency head.</p> <p>During the onsite audit, the auditor inquired with the agency head designee whether the annual report had been approved by the agency head. The designee responded affirmatively.</p> <p>115.88 (d)</p> <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states personal identifiers and sensitive information shall be redacted from the reports in instances when publication would present a clear and specific threat to the safety and security of a unit, while maintaining the nature of the material.</p> <p>The auditor reviewed the Texas Department of Criminal Justice Safe Prisons / PREA Program Annual Report for 2023, which illustrated compliance with this requirement.</p> <p>During the in-person audit, the auditor conducted an interview with the agency's PREA coordinator and ombudsman. The coordinator was inquired about the typical information that is redacted from the annual report. She informed the auditor that there is no requirement to redact information from the annual report because it does not contain any personally identifiable information.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |
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| 115.89 | Data storage, publication, and destruction |
| | Auditor Overall Determination: Audited at Agency Level |
| | Auditor Discussion |
| | 115.89 |

Document Review:

- The Texas Department of Criminal Justice Executive Directive ED-02.29 Records Management
- The Texas Department of Criminal Justice Safe Prisons / PREA Plan
- The Texas Department of Criminal Justice Records Retention Schedule

Interviews:

- Interview with agency PREA Coordinator / Ombudsman

Findings by Provision:

115.89 (a)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states All data collected pursuant to Section VII.A shall be securely maintained.

The Texas Department of Criminal Justice Executive Directive ED-02.29 Records Management states the TDCJ develops, implements, and monitors an agency-wide records management program that complies with all state and federal laws while safeguarding all state records, both paper and electronic, through effective records management, retention, storage, protection, and disposition. The TDCJ continually addresses the use of new technologies for records management while ensuring transparency by open and verifiable documentation of the processes and activities carried out in the management of all state records.

During the onsite audit, the auditor conducted an interview with the agency's PREA coordinator and ombudsman. The auditor inquired about the agency's data collection and aggregation practices for assessing and improving the effectiveness of its sexual abuse prevention, detection, and response policies. The coordinator reported that the agency diligently collects sexual abuse and sexual harassment data from all its facilities, which is securely retained in a specific agency database accessible only to authorized staff. This data is aggregated, and patterns and problem areas are

identified through this process. The coordinator also mentioned that PREA audit reports are reviewed to identify any deficiencies. All this information is utilized to determine if there is a need to modify or update policies and procedures to enhance sexual safety in the facilities. Additionally, the coordinator indicated that her office is responsible for the PREA portion of the annual report, which is highly comprehensive.

115.89 (b)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states aggregated sexual abuse data, from all TDCJ operated facilities, including privately contracted facilities, shall be readily available to the public at least annually, through a website or other means.

The auditor reviewed the agency's external website and verified that the most recent edition of the agency's annual report was posted and readily available to the public.

115.89 (c) (d)

The Texas Department of Criminal Justice Records Retention Schedule illustrates that the agency maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.

The Texas Department of Criminal Justice reported in the PAQ that they do not put personally identifiable information in the annual report, therefore there is nothing to redact.

Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.

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| 115.401 | Frequency and scope of audits |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |

115.401 Frequency and Scope of Audits

Document Review:

- Texas Department of Criminal Justice Agency External Website

Findings by Provision:

115.401 (a)

The Texas Department of Criminal Justice ensured that during the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency mandated that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once.

The auditor reviewed agency records which illustrated the agency met this standard requirement during the prior three-year audit cycle.

115.401 (b)

The Texas Department of Criminal Justice ensured that during each one-year period starting on August 20, 2013, the agency completed audits of at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency.

The auditor reviewed agency records which illustrated the agency met this standard requirement during the prior year.

Compliance Finding: Substantially Compliant

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| | Based upon information reviewed, including policies, procedures, site review, and interviews conducted, the agency is substantially compliant with this standard. |
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| 115.403 Audit contents and findings | |
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| | Auditor Overall Determination: Audited at Agency Level |
| | Auditor Discussion |
| | <p>115.403</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Agency External Website <p>Findings by Provision:</p> <p>115.403 (a)</p> <p>The Texas Department of Criminal Justice ensures that auditor’s final reports are published to the agency’s external website and therefore readily available for public review.</p> <p>The auditor verified the public availability of all final audit reports through a review of the agency’s external website. Each report was accompanied by a web link, serving as evidence of their official release.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |

| Appendix: Provision Findings | | |
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| 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 (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.) | |
| 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 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 | yes |

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| | practices? | |
| | 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 consideration: Any applicable State or local laws, regulations, or standards? | yes |
| | In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse? | yes |
| | In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors? | yes |
| 115.13 (b) | Supervision and monitoring | |

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| | In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.) | yes |
| 115.13 (c) | Supervision and monitoring | |
| | In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section? | yes |
| | In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies? | yes |
| | In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan? | yes |
| 115.13 (d) | Supervision and monitoring | |
| | Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? | yes |
| | Is this policy and practice implemented for night shifts as well as day shifts? | yes |
| | Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? | yes |
| 115.14 (a) | Youthful inmates | |
| | Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).) | na |
| 115.14 (b) | Youthful inmates | |
| | In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).) | na |

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

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| | genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? | |
| | Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? | yes |
| | Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit? | yes |
| 115.15 (e) | Limits to cross-gender viewing and searches | |
| | This provision is no longer applicable to your compliance finding, please select N/A. | na |
| 115.15 (f) | Limits to cross-gender viewing and searches | |
| | This provision is no longer applicable to your compliance finding, please select N/A. | na |
| 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 | yes |

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

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| | 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? | |
| 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)? | |
| | 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? | |
| | Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above? | |
| | 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)? | |
| | 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? | |
| | 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? | |
| 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? | |
| | Does the agency consider any incidents of sexual harassment in | |

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| | determining whether to enlist the services of any contractor who may have contact with inmates? | |
| 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? | |
| | 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? | |
| 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? | |
| 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? | |
| 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? | |
| | 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? | |
| | Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? | |
| 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? | |

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| 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.) | |
| 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.) | |
| 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.) | |
| 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/ | yes |

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| | 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.) | |
| 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 |

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| 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 | yes |

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| | inmates on its zero-tolerance policy for sexual abuse and sexual harassment? | |
| | 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 |
| | The subsection of this provision is no longer applicable to your compliance finding, please select N/A. | 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 | yes |

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| | received such training? | |
| | 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 | |

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| | 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 |

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| 115.34 (a) | Specialized training: Investigations | |
| | In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |
| 115.34 (b) | Specialized training: Investigations | |
| | Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |
| | Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |
| | Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |
| | Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or 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 |

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| | Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) | yes |
| | Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) | yes |
| | Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) | yes |
| 115.35 (b) | Specialized training: Medical and mental health care | |
| | If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.) | 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 |

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| 115.41 (a) | Screening for risk of victimization and abusiveness | |
| | Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? | yes |
| | Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? | yes |
| 115.41 (b) | Screening for risk of victimization and abusiveness | |
| | Do intake screenings ordinarily take place within 72 hours of arrival at the facility? | yes |
| 115.41 (c) | Screening for risk of victimization and abusiveness | |
| | Are all PREA screening assessments conducted using an objective screening instrument? | yes |
| 115.41 (d) | Screening for risk of victimization and abusiveness | |
| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability? | yes |
| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate? | yes |
| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate? | yes |
| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated? | yes |
| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent? | yes |
| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child? | yes |
| | The subsection of this provision is no longer applicable to your compliance finding, please select N/A. | na |

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| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization? | yes |
| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability? | yes |
| | Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes? | yes |
| 115.41 (e) | Screening for risk of victimization and abusiveness | |
| | In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse? | yes |
| | In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses? | yes |
| | In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse? | yes |
| 115.41 (f) | Screening for risk of victimization and abusiveness | |
| | Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening? | yes |
| 115.41 (g) | Screening for risk of victimization and abusiveness | |
| | Does the facility reassess an inmate's risk level when warranted due to a referral? | yes |
| | Does the facility reassess an inmate's risk level when warranted due to a request? | yes |
| | Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse? | yes |
| | Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness? | yes |
| 115.41 (h) | Screening for risk of victimization and abusiveness | |

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| | Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section? | yes |
| 115.41 (i) | Screening for risk of victimization and abusiveness | |
| | Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates? | yes |
| 115.42 (a) | Use of screening information | |
| | Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments? | yes |
| | Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments? | yes |
| | Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of 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 | |
| | This provision is no longer applicable to your compliance finding, please select N/A. | na |

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| 115.42 (d) | Use of screening information | |
| | This provision is no longer applicable to your compliance finding, please select N/A. | na |
| 115.42 (e) | Use of screening information | |
| | This provision is no longer applicable to your compliance finding, please select N/A. | na |
| 115.42 (f) | Use of screening information | |
| | This provision is no longer applicable to your compliance finding, please select N/A. | na |
| 115.42 (g) | Use of screening information | |
| | This provision is no longer applicable to your compliance finding, please select N/A. | na |
| 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, | na |

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| | 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.) | |
| | 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.) | na |
| | 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.) | na |
| 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 | yes |

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| | privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment? | |
| | Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents? | yes |
| 115.51 (b) Inmate reporting | | |
| | Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? | yes |
| | Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials? | yes |
| | Does that private entity or office allow the inmate to remain anonymous upon request? | yes |
| | Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials 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 | | |

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| | Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.) | yes |
| | Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.) | yes |
| 115.52 (c) | Exhaustion of administrative remedies | |
| | Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) | yes |
| | Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency 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 | yes |

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| | standard.) | |
| | 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 | |

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| | If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.) | yes |
| 115.53 (a) | Inmate access to outside confidential support services | |
| | Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? | yes |
| | Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.) | na |
| | Does the facility enable reasonable communication between 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 | yes |

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| | 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? | |
| | Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment? | yes |
| | Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? | yes |
| 115.61 (b) | Staff and agency reporting duties | |
| | Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a 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 | yes |

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| | risk of imminent sexual abuse, does it take immediate action to protect the inmate? | |
| 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, | yes |

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| | defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? | |
| 115.64 (b) | Staff first responder duties | |
| | If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff? | yes |
| 115.65 (a) | Coordinated response | |
| | Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse? | yes |
| 115.66 (a) | Preservation of ability to protect inmates from contact with abusers | |
| | Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted? | |
| 115.67 (a) | Agency protection against retaliation | |
| | Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff? | yes |
| | Has the agency designated which staff members or departments are charged with monitoring retaliation? | yes |
| 115.67 (b) | Agency protection against retaliation | |
| | Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations? | yes |
| 115.67 (c) | Agency protection against retaliation | |

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| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report 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 |

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| 115.67 (e) | Agency protection against retaliation | |
| | If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation? | yes |
| 115.68 (a) | Post-allegation protective custody | |
| | Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43? | yes |
| 115.71 (a) | Criminal and administrative agency investigations | |
| | When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).) | yes |
| | Does the agency conduct such investigations for all allegations, 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 |

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| 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 | yes |

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| | abuse investigations. See 115.21(a).) | |
| 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 | yes |

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| | 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? | |
| 115.73 (d) | Reporting to inmates | |
| | Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility? | yes |
| | Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility? | yes |
| 115.73 (e) | Reporting to inmates | |
| | Does the agency document all such notifications or attempted notifications? | yes |
| 115.76 (a) | Disciplinary sanctions for staff | |
| | Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies? | yes |
| 115.76 (b) | Disciplinary sanctions for staff | |
| | Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse? | yes |
| 115.76 (c) | Disciplinary sanctions for staff | |
| | Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories? | yes |
| 115.76 (d) | Disciplinary sanctions for staff | |
| | Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law | yes |

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| | enforcement agencies(unless the activity was clearly not criminal)? | |
| | 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 | yes |

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| | 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? | |
| 115.78 (e) | Disciplinary sanctions for inmates | |
| | Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? | yes |
| 115.78 (f) | Disciplinary sanctions for inmates | |
| | For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? | yes |
| 115.78 (g) | Disciplinary sanctions for inmates | |
| | If the agency prohibits all sexual activity between inmates, does 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 | na |

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| | health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail). | |
| 115.81 (d) | Medical and mental health screenings; history of sexual abuse | |
| | Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law? | yes |
| 115.81 (e) | Medical and mental health screenings; history of sexual abuse | |
| | Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18? | yes |
| 115.82 (a) | Access to emergency medical and mental health services | |
| | Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment? | yes |
| 115.82 (b) | Access to emergency medical and mental health services | |
| | If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? | yes |
| | Do security staff first responders immediately notify the appropriate medical and mental health practitioners? | yes |
| 115.82 (c) | Access to emergency medical and mental health services | |
| | Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate? | yes |
| 115.82 (d) | Access to emergency medical and mental health services | |
| | Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? | yes |

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| 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 |

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| 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 |
| | The subsection of this provision is no longer applicable to your compliance finding, please select N/A. | na |
| | Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse? | yes |
| | Does the review team: Assess the adequacy of staffing levels in that area during different shifts? | yes |
| | Does the review team: Assess whether monitoring technology | yes |

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| | should be deployed or augmented to supplement supervision by staff? | |
| | 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 |
| 115.401 (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 |

PREA Agency Audit Report: Final

Name of Agency: Texas Department of Criminal Justice

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 09/26/2025

| 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: Matthew Taylor | Date of Signature: 09/26/2025 |

| AUDITOR INFORMATION | |
|-------------------------------------|--------------------------|
| Auditor name: | Taylor, Matthew |
| Email: | matthew@preaauditing.com |
| Start Date of On-Site Audit: | |
| End Date of On-Site Audit: | |

| 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: | Bobby Lumpkin |
| Email Address: | Bobby.Lumpkin@tdcj.texas.gov |
| Telephone Number: | 936-437-2101 |

| Agency-Wide PREA Coordinator Information | | | |
|---|-----------------------|-----------------------|-----------------------------------|
| Name: | Cassandra McGilbra | Email Address: | cassandra.mcgilbra@tdcj.texas.gov |

| Agency AUDIT FINDINGS | |
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| 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: | |
| 10 | |
| Number of standards not met: | |
| 0 | |

| Standards | |
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| 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 |
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| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.11</p> <p>Document Review:</p> <ul style="list-style-type: none"> · Texas Department of Criminal Justice Board Policy BP—2.09 Prison Rape Elimination Act Ombudsman Policy Statement · Texas Board of Criminal Justice Organizational Chart · Texas Department of Criminal Justice Organizational Structure <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with agency PREA coordinator / ombudsman <p>Findings by Provision:</p> |

115.11 (b)

The Texas Department of Criminal Justice Board Policy BP—2.09 Prison Rape Elimination Act Ombudsman Policy Statement states it is the policy of the Texas Board of Criminal Justice (TBCJ) that the Prison Rape Elimination Act (PREA) ombudsman shall coordinate the Texas Department of Criminal Justice's (TDCJ) efforts to comply with the PREA standards in all of its correctional and community residential facilities. The PREA ombudsman shall have sufficient time and authority to oversee the TDCJ's policies relating to the elimination of sexual abuse and harassment of inmates at correctional facilities, as well as individuals at community residential facilities, and implementation of the PREA standards. In addition, the PREA ombudsman shall oversee the reporting of sexual abuse and sexual harassment to the TDCJ and serve as the independent office to receive and immediately forward reports of sexual abuse and sexual harassment to TDCJ officials, allowing an inmate to remain anonymous upon request. The PREA ombudsman reports directly and only to the TBCJ and reports all pertinent items directly to the TBCJ chairman, as deemed appropriate and necessary. The TDCJ shall establish guidelines for reporting complaints or inquiries from elected officials, the public, and inmates pertaining to allegations of sexual abuse and sexual harassment and related TDCJ initiatives to the PREA ombudsman.

Compliance was also determined through a review of both the Texas Board of Criminal Justice Organizational Chart and Texas Department of Criminal Justice Organizational Structure.

An interview was conducted with the agency PREA coordinator/ombudsman. The PREA coordinator confirmed that she believed she had sufficient time to manage all of her PREA related responsibilities.

The PREA coordinator/ombudsman also reported that in addition to PREA compliance managers that are assigned to each facility throughout the state, she is also responsible for seven regional staff who oversee specific regions. She reported that her office is responsible for site visits, in which they conduct mock audits with the facilities, which is coordinated with the PREA compliance managers.

The PREA coordinator/ombudsman was asked about her actions when she discovers non-compliance with a PREA standard. She reported that they usually initiate a corrective action period for the facility, depending on the specific issue identified. They evaluate whether the non-compliance is attributed to staff actions or policy or procedure violations. Subsequently, they draft a corrective action report, which is forwarded to the director. She emphasized that she and her staff collaborate closely with the staff at the Texas Department of Criminal Justice to rectify non-compliance as expeditiously as possible.

During the audit process, the auditor examined additional criteria to determine whether the PREA coordinator/ombudsman was compliant with the standard, as she does not directly work for The Texas Department of Criminal Justice. The auditor found that there was no additional guidance provided beyond the requirement to

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| | <p>employ or designate a PREA coordinator. Through interviews with the PREA coordinator/ombudsman, the auditor determined that the coordinator satisfies the requirement of the standard as written.</p> <p>The auditor conducted an examination to ascertain whether the PREA coordinator/ombudsman possessed the requisite authority and direct access to the agency's most senior leader. This included direct access to the agency's executive or senior leadership team and the requisite influence to establish and implement agency-wide policies, procedures, and practices without interference from other levels of bureaucracy or supervision. The initial interview with the PREA coordinator and subsequent interviews revealed that she satisfies all the aforementioned requirements.</p> <p>Based upon information contained in the PAQ, policies, procedures and interviews conducted, the agency is substantially compliant with this standard.</p> |
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| 115.12 | Contracting with other entities for the confinement of inmates |
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| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.12</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Solicitation and Modification of Private Residential Reentry Centers Contracts. · The Texas Department of Criminal Justice Solicitation and Modification of Private Transitional Treatment Centers Contracts · The Texas Department of Criminal Justice Solicitation and Modification of Secure Private Facilities Contracts <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with agency contract administrator <p>Findings by Provision:</p> <p>115.12 (a)</p> <p>The Texas Department of Criminal Justice Solicitation and Modification Contract specifically outline the following requirements:</p> <p>A. Upon award of this contract, the contractor shall obtain PREA compliance for the facilities within (12) months of the service commencement date. The contractor shall maintain compliance with all applicable PREA standards at all times thereafter.</p> |

- B. The contractor shall comply with the PREA Prison/Jail/Community Confinement Standards and report inmate abuse to the TDCJ-PFCMOD.
- C. The contractor shall notify the TDCJ-PFCMOD when a PREA compliance audit is scheduled.
- D. The Department designated TDCJ-PFCMOD monitor will monitor the facility to ensure the contractor is compliant with the PREA Prison/Jail/Community Confinement Standards.
- E. The contractor shall correct all identified areas of non-compliance in regards to PREA Prison/Jail/Community Confinement Standards deemed applicable and within a time frame determined by the Department or by the date of a Department approved extension.
- F. Upon completion of the PREA compliance audit, the contractor shall provide a copy of the initial report and final report to the TDCJ-PFCMOD.
- G. All associated fees shall be the contractor's responsibility.

115.12 (b)

The Texas Department of Criminal Justice Solicitation and Modification Contract specifically outline the following requirements:

- A. Upon award of this contract, the contractor shall obtain PREA compliance for the facilities within (12) months of the service commencement date. The contractor shall maintain compliance with all applicable PREA standards at all times thereafter.
- B. The contractor shall comply with the PREA Prison/Jail/Community Confinement Standards and report inmate abuse to the TDCJ-PFCMOD.
- C. The contractor shall notify the TDCJ-PFCMOD when a PREA compliance audit is scheduled.
- D. The Department designated TDCJ-PFCMOD monitor will monitor the facility to ensure the contractor is compliant with the PREA Prison/Jail/Community Confinement Standards.
- E. The contractor shall correct all identified areas of non-compliance in regards to PREA Prison/Jail/Community Confinement Standards deemed applicable and within a time frame determined by the Department or by the date of a Department approved extension.
- F. Upon completion of the PREA compliance audit, the contractor shall provide a copy of the initial report and final report to the TDCJ-PFCMOD.
- G. All associated fees shall be the contractor's responsibility.

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| | <p>During the audit process, the auditor conducted an interview with the agency’s designated contract administrator. The contract monitor was inquired about the agency’s monitoring mechanisms for newly and renewed contracts involving confinement services to ascertain compliance with the mandated PREA practices. She clarified that the agency employs contract monitors to oversee compliance with the agency’s policies, procedures, and specific PREA practices.</p> <p>The contract administrator has reported that compliance reports for each contract entered into within the past 12 months have been completed.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |
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| 115.17 | Hiring and promotion decisions |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.17</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Executive Directive PD-75 Applicants with Pending Criminal Charges or Prior Criminal Convictions · The Texas Department of Criminal Justice Employment Application Supplement · The Texas Department of Criminal Justice Safe Prisons / PREA Plan · The Texas Department of Criminal Justice Executive Directive PD-56 Request for and Release of Employment Information or Documents · The Texas Department of Criminal Justice Executive Directive PD-71 Selection System Procedures · The Texas Department of Criminal Justice Executive Directive PD-27 Employment Status Pending Resolution of Criminal Charges or Protective Orders · The Texas Department of Criminal Justice Executive Directive PD-73 Selection Criteria for Correctional Officer Applicants · Examples of Persons Hired or Promoted in the Past 12-Months <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with human resources staff <p>Findings by Provision:</p> |

115.17 (a)

The Texas Department of Criminal Justice Executive Directive PD-75 Applicants with Pending Criminal Charges or Prior Criminal Convictions states the TDCJ will not hire, as an employee or contract employee, any individual who may have contact with offenders, if they have:

1. Engaged in sexual abuse in a prison, jail, adult or juvenile confinement facility, or other similar institution setting;
2. Been convicted of engaging or attempting to engage in sexual activity by use of force, overt or implied threats of force or coercion, or if the victim did not consent or was unable to consent or refuse; or
3. Been civilly or administratively adjudicated for engaging in the activity listed in Section I.C.1-2.

115.17 (b)

The Texas Department of Criminal Justice Executive Directive PD-75 Applicants with Pending Criminal Charges or Prior Criminal Convictions states the TDCJ will consider any incidents of sexual harassment in determining whether to hire an individual, or to enlist the services of a contractor, who may have contact with offenders.

During the onsite portion of the audit, the auditor interviewed a representative from human resources. She reported that the agency always considers prior incidents of sexual harassment when determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

115.17 (c)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states before hiring new employees who may have contact with offenders, the TDCJ shall:

- a. Perform a criminal background check; and
- b. Attempt to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse, in accordance with federal, state, and local law.

During the onsite portion of the audit, the auditor interviewed a representative from human resources. She reported that the agency performs criminal background checks as required under this provision.

115.17 (d)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states a criminal background record check shall be performed before enlisting the services of any

contractor who may have contact with offenders.

During the onsite portion of the audit, the auditor interviewed a representative from human resources. She reported that the agency performs criminal background checks as required under this provision.

115.17 (e)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states criminal background checks shall either be conducted at least every five years for current employees and contractors who may have contact with offenders, or a system shall be in place to otherwise attain the information for current employees.

The Texas Department of Criminal Justice Executive Directive PD-27 Employment Status Pending Resolution of Criminal Charges or Protective Orders states that Employee Relations shall conduct a semi-annual background check for each employee to ensure there are no outstanding warrants of arrest for the employee once during the month of the employee's birthday and once 180 days later.

During the onsite portion of the audit, the auditor interviewed a representative from human resources. She reported that the agency is subscribed to T-LETS which is a system that immediately reports to the agency when there is any change to an employee's background.

115.17 (f)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states The TDCJ shall directly ask all applicants and employees who may have contact with offenders about previous misconduct described in Section VIII.A.1.a in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of employee reviews. The TDCJ shall also impose on employees a continuing affirmative duty to disclose knowledge of any such misconduct.

115.17 (g)

The Texas Department of Criminal Justice Executive Directive PD-73 Selection Criteria for Correctional Officer Applicants states prior to an applicant being employed by the TDCJ, the applicant shall provide all required documentation. The Employment Section, Human Resources Division, shall verify the authenticity of the documentation.

A. An applicant who provides false or inaccurate information or documentation in the application process shall be disqualified from consideration for any TDCJ position for a minimum period of one year from the date of the applicant's PERS 283, State of Texas Application for Employment.

B. A current employee who provides false or inaccurate information documentation may be subject to disciplinary action in accordance with PD-22,

"General Rules of Conduct and Disciplinary Action Guidelines for Employees."

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| 115.17 (h) | <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states unless prohibited by law, information shall be provided on substantiated allegations of sexual abuse or sexual harassment involving a former employee after receiving a request from an institutional employer for whom the employee has applied to work.</p> <p>During the onsite portion of the audit, the auditor interviewed a representative from human resources. She stated that the agency does provide information on substantiated allegations of sexual abuse and sexual harassment about former employees upon receiving a request.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |
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| 115.18 | Upgrades to facilities and technologies |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.18</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Safe Prisons / PREA Plan · The Texas Department of Criminal Justice Video Surveillance System Preventative Maintenance Checklist · The Texas Department of Criminal Justice Video Surveillance System Guidelines <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with agency head and agency head designee <p>Findings by Provision:</p> <p>115.18 (a)</p> <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states when designing or acquiring any new unit and in planning any substantial expansion or modification of existing units, the TDCJ shall consider the effect of the design, acquisition, expansion, or modification on the ability to protect offenders from sexual abuse.</p> <p>During the onsite audit, the auditor conducted interviews with both the agency head and the agency head designee. The auditor engaged in a detailed discussion with the agency head regarding their compliance with the specified provision. The agency</p> |

head informed the auditor that they had not designed a facility since the 1990s. However, they recently secured funding for 5,600 additional beds, which will be strategically placed in existing facilities where staffing capacity is anticipated. The design will adhere to the anticipated practices of the ACA. Furthermore, the agency head emphasized the importance of adhering to 100% PREA when making these designs.

The agency designee informed me that we conduct thorough assessments of potential areas with a higher incidence of allegations. We are currently in communication with our information technology division to explore the possibility of installing additional cameras.

115.18 (b)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, consideration shall be given as to how the technology may enhance the ability to protect offenders from sexual abuse.

During the onsite audit, the auditor conducted interviews with both the agency head and the agency head designee. The agency head designee stated, "We do have a comprehensive video surveillance system on our maximum-security facilities across the state. We have 23 maximum-security facilities that have video surveillance throughout the housing area and the entire facility. Additionally, we implemented body-worn cameras last year to assist in any allegations or assaults that may occur on a facility. These body-worn cameras are also available on our 23 maximum-security facilities throughout the state. There are facilities that do not have body-worn cameras but still have some form of surveillance.

Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.

| 115.42 | Use of screening information |
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| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.42</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Safe Prisons / PREA Plan · The Texas Department of Criminal Justice Classification Plan · The Texas Department of Criminal Justice Administrative Directive AD-04.17 Inmate Housing Assignment Criteria and Procedures |

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| | <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with PREA coordinator / ombudsman <p>Findings by Provision:</p> <p>115.42 (a)</p> <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states that when deciding to assign a transgender or intersex offender to a unit for male or female offenders, and when making other housing and programming assignments, consideration shall be made on a case-by-case basis with regard to the health and safety of the offender and potential management or security problems.</p> <p>Housing determinations shall not be made solely on the basis of LGBTI status. Unit Classification Committee (UCC), or a similarly designed committee for units without a UCC, shall use information from the risk screening document required by Section III.B of this plan to make housing, bed, work, education, and program assignments with the goal of separating offenders at high risk of being sexually victimized from offenders at high risk of being sexually abusive in accordance with the TDCJ Classification Plan and the TDCJ Unit Classification Procedures Manual.</p> <p>The committee shall make individualized determinations regarding how to ensure the safety of each offender.</p> <p>During the onsite audit, the auditor conducted an interview with the agency's PREA coordinator and ombudsman. The auditor inquired about the agency's policies regarding the placement of transgender and intersex inmates in dedicated housing units, facilities, or wings. The coordinator confirmed that the agency is not currently under a legal requirement or consent decree that mandates the placement of this population in dedicated spaces. She explained that inmates are housed on a case-by-case basis, and their overall classification scores are considered when determining the most appropriate placement for their health and safety.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with 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 |
| | 115.66 |
| | Document Review: |

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| | <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Statement of Fact Related to 115.66 <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with agency head and agency head designee <p>Findings by Provision:</p> <p>115.66 (a)</p> <p>The Texas Department of Criminal Justice Statement of Fact related to standard 115.66 states the agency has not entered or renewed any collective bargaining or other agreement. TDCJ does not engage in collective bargaining with staff. Staff are subject to the rules of conduct and other TDCJ policies mandating zero tolerance of all forms of sexual abuse and sexual harassment.</p> <p>During the onsite audit, the auditor conducted an interview with the agency head and the agency head designee. The agency head designee reiterated what was written in the statement of fact. The Texas Department of Criminal Justice and the State of Texas is not a collective bargaining State.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard</p> |
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| 115.87 | Data collection |
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| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.87</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Safe Prisons / PREA Plan · The Texas Department of Criminal Justice Administrative Directive AD-02.15 Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents · The Texas Department of Criminal Justice Data Collection Instrument · The Texas Department of Criminal Justice Emergency Action Center Notification Handbook · 2023 Annual Survey of Sexual Victimization Summary Form <p>Findings by Provision:</p> <p>115.87 (a)</p> |

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states accurate, uniform data shall be collected for every incident of sexual abuse alleged to have occurred at a TDCJ operated facility using a standardized instrument and set of definitions.

The Texas Department of Criminal Justice Administrative Directive AD-02.15 Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents, provides the set of definitions required under this provision.

115.87 (b)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states Incident-based sexual abuse data shall be aggregated at least annually.

The auditor reviewed examples provided by the agency of aggregated data collected illustrating further compliance with this provision.

115.87 (c)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states the incident-based data collected shall include, at a minimum, information necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.

The auditor also reviewed the data collection instrument utilized by the agency which is called SPPANS Database. The auditor ensured that the information collected in the instrument minimally captured information necessary to answer all the questions in the Survey of Sexual Victimization.

115.87 (d)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews shall be maintained, reviewed, and collected as needed to complete the SSV.

115.87 (e)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states Aggregated sexual abuse data, from all TDCJ operated facilities, including privately contracted facilities, shall be readily available to the public at least annually, through a website or other means.

115.87 (f)

The Texas Department of Criminal Justice reported in the PAQ that the Department of Justice did not request data from the agency from the previous calendar year.

Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.

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| 115.88 | Data review for corrective action |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.88</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Board Policy BP-02.09 Prison Rape Elimination Act Ombudsman Policy Statement · The Texas Department of Criminal Justice Safe Prisons / PREA Program Annual Report for 2023 · The Texas Department of Criminal Justice Safe Prisons / PREA Plan <p>Interviews:</p> <ul style="list-style-type: none"> · Interview with agency head and agency head designee · Interview with agency PREA Coordinator / Ombudsman <p>Findings by Provision:</p> <p>115.88 (a)</p> <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states the TDCJ shall review data collected pursuant to Section VII.A of this plan in order to assess and improve the effectiveness of the sexual abuse prevention, detection, and response policies, procedures, and training by:</p> <ol style="list-style-type: none"> a. Identifying problematic areas; b. Taking corrective action on an ongoing basis; and c. Preparing an annual report of findings and corrective actions for each unit, as well as the TDCJ as a whole, in collaboration with the OIG and PREA ombudsman. <p>The Texas Department of Criminal Justice Board Policy BP-02.09 Prison Rape Elimination Act Ombudsman Policy Statement also states the PREA ombudsman’s responsibilities include the following:</p> <ol style="list-style-type: none"> 1. Monitor TDCJ policy for the prevention of sexual abuse and sexual harassment of inmates at correctional facilities, as well as individuals at community residential facilities, and compliance with PREA ombudsman policies and procedures to assure PREA compliance. 2. Provide oversight of education and training for employees, inmates, and other individuals assuring the curriculum and trainers cover topics required in the PREA standards to include specific topics and information, and serve as a subject matter |

expert regarding training.

3. Make recommendations to TDCJ executive management concerning changes in policies and procedures necessary to comply with PREA standards.

4. Process complaints and inquiries from elected officials, the public, and inmates concerning sexual abuse and sexual harassment and TDCJ initiatives related to PREA and ensure impartial resolution. The PREA ombudsman may use discretion to respond directly or forward complaints to appropriate TDCJ staff for investigation and disposition. Criminal investigations are the responsibility of the Office of the Inspector General (OIG).

5. Oversee the administrative investigation of allegations of sexual abuse and sexual harassment to assure quality and thorough investigations.

6. Collect statistics regarding allegations of sexual abuse and sexual harassment from each correctional facility to comply with PREA standards.

7. Prepare monthly and semiannual activity reports for distribution to the TBCJ chairman, TBCJ members, and TDCJ executive management. 8. Ensure the TBCJ chairman and TDCJ executive management are informed of any problematic, systemic trends.

During the onsite audit, the auditor conducted interviews with the agency head and the agency head designee. The auditor inquired about the agency's use of incident-based sexual abuse data to assess and enhance sexual abuse prevention detection and response policies and practices. The agency head designee informed the auditor that the Texas Department of Criminal Justice (TDCJ) collaborates closely with the PREA ombudsman to collect all pertinent data associated with reports of sexual abuse and sexual harassment. The designee further stated that all TDCJ facilities collect incident-based data and aggregate it for the PREA ombudsman's office to develop corrective action response plans tailored to the assessed needs.

During the onsite audit, the auditor conducted an interview with the agency's PREA coordinator and ombudsman. The auditor inquired about the agency's data collection and aggregation practices for assessing and improving the effectiveness of its sexual abuse prevention, detection, and response policies. The coordinator reported that the agency diligently collects sexual abuse and sexual harassment data from all its facilities, which is securely retained in a specific agency database accessible only to authorized staff. This data is aggregated, and patterns and problem areas are identified through this process. The coordinator also mentioned that PREA audit reports are reviewed to identify any deficiencies. All this information is utilized to determine if there is a need to modify or update policies and procedures to enhance sexual safety in the facilities. Additionally, the coordinator indicated that her office is responsible for the PREA portion of the annual report, which is highly comprehensive.

115.88 (b)

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| | <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states the annual report shall include a comparison of the data and corrective actions from the current year with those from prior years and shall provide an assessment of the progress made in addressing sexual abuse.</p> <p>The auditor also reviewed the provided Texas Department of Criminal Justice Safe Prisons / PREA Program Annual Report for 2023. The report provided includes a comparison of the current year's data and corrective actions with those from prior years. Additionally, the annual report provides an assessment of the agency's progress in addressing sexual abuse.</p> <p>115.88 (c)</p> <p>The Texas Department of Criminal Justice provided a web link in the PAQ where a copy of the most recent annual report was publicly available for review. The annual report was also reviewed and approved by the agency head.</p> <p>During the onsite audit, the auditor inquired with the agency head designee whether the annual report had been approved by the agency head. The designee responded affirmatively.</p> <p>115.88 (d)</p> <p>The Texas Department of Criminal Justice Safe Prisons / PREA Plan states personal identifiers and sensitive information shall be redacted from the reports in instances when publication would present a clear and specific threat to the safety and security of a unit, while maintaining the nature of the material.</p> <p>The auditor reviewed the Texas Department of Criminal Justice Safe Prisons / PREA Program Annual Report for 2023, which illustrated compliance with this requirement.</p> <p>During the in-person audit, the auditor conducted an interview with the agency's PREA coordinator and ombudsman. The coordinator was inquired about the typical information that is redacted from the annual report. She informed the auditor that there is no requirement to redact information from the annual report because it does not contain any personally identifiable information.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |
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| 115.89 | Data storage, publication, and destruction |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | 115.89 |

Document Review:

- The Texas Department of Criminal Justice Executive Directive ED-02.29 Records Management
- The Texas Department of Criminal Justice Safe Prisons / PREA Plan
- The Texas Department of Criminal Justice Records Retention Schedule

Interviews:

- Interview with agency PREA Coordinator / Ombudsman

Findings by Provision:

115.89 (a)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states All data collected pursuant to Section VII.A shall be securely maintained.

The Texas Department of Criminal Justice Executive Directive ED-02.29 Records Management states the TDCJ develops, implements, and monitors an agency-wide records management program that complies with all state and federal laws while safeguarding all state records, both paper and electronic, through effective records management, retention, storage, protection, and disposition. The TDCJ continually addresses the use of new technologies for records management while ensuring transparency by open and verifiable documentation of the processes and activities carried out in the management of all state records.

During the onsite audit, the auditor conducted an interview with the agency's PREA coordinator and ombudsman. The auditor inquired about the agency's data collection and aggregation practices for assessing and improving the effectiveness of its sexual abuse prevention, detection, and response policies. The coordinator reported that the agency diligently collects sexual abuse and sexual harassment data from all its facilities, which is securely retained in a specific agency database accessible only to authorized staff. This data is aggregated, and patterns and problem areas are identified through this process. The coordinator also mentioned that PREA audit reports are reviewed to identify any deficiencies. All this information is utilized to determine if there is a need to modify or update policies and procedures to enhance sexual safety in the facilities. Additionally, the coordinator indicated that her office is responsible for the PREA portion of the annual report, which is highly comprehensive.

115.89 (b)

The Texas Department of Criminal Justice Safe Prisons / PREA Plan states aggregated sexual abuse data, from all TDCJ operated facilities, including privately contracted facilities, shall be readily available to the public at least annually, through a website or other means.

The auditor reviewed the agency's external website and verified that the most recent

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| | <p>edition of the agency’s annual report was posted and readily available to the public.</p> <p>115.89 (c) (d)</p> <p>The Texas Department of Criminal Justice Records Retention Schedule illustrates that the agency maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.</p> <p>The Texas Department of Criminal Justice reported in the PAQ that they do not put personally identifiable information in the annual report, therefore there is nothing to redact.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard.</p> |
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| 115.401 | Frequency and scope of audits |
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| | Auditor Overall Determination: |
| | Auditor Discussion |
| | <p>115.401</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Agency External Website <p>Findings by Provision:</p> <p>115.401 (a)</p> <p>The Texas Department of Criminal Justice ensured that during the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency mandated that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once.</p> <p>The auditor reviewed agency records which illustrated the agency met this standard requirement during the prior three-year audit cycle.</p> <p>115.401 (b)</p> <p>The Texas Department of Criminal Justice ensured that during each one-year period starting on August 20, 2013, the agency shall completed audits of at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency.</p> <p>The auditor reviewed agency records which illustrated the agency met this standard requirement during the prior year.</p> |

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| | Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard. |
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| 115.403 | Audit contents and findings |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>115.403</p> <p>Document Review:</p> <ul style="list-style-type: none"> · The Texas Department of Criminal Justice Agency External Website <p>Findings by Provision:</p> <p>115.403 (a)</p> <p>The Texas Department of Criminal Justice ensures that auditor’s final reports are published to the agency’s external website and therefore readily available for public review.</p> <p>The auditor verified the public availability of all final audit reports through a review of the agency’s external website. Each report was accompanied by a web link, serving as evidence of their official release.</p> <p>Based upon information contained in the PAQ, policies, procedures, site review and interviews conducted, the agency is substantially compliant with this standard</p> |

| Appendix: Provision Findings | | |
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| 115.11 (b) | Zero tolerance of sexual abuse and sexual harassment; PREA coordinator | |
| | Has the agency employed or designated an agency-wide PREA Coordinator? | yes |
| | 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 |
| 115.12 (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 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.) | yes |
| 115.17 (a) | Hiring and promotion decisions | |
| | Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? | yes |
| | Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? | yes |
| | Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity | yes |

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| | 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 | |

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| | 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, | yes |

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| | 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.) | |
| 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 present management or security problems? | yes |
| 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 |
| 115.87 (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 | |

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| | 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 to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole? | yes |
| 115.88 (b) | Data review for corrective action | |
| | Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse? | yes |

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| 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.) | yes |

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| | If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.) | na |
| | If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.) | na |
| 115.403 (f) | Audit contents and findings | |
| | The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse 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 |