

PREA Facility Audit Report: Final

Name of Facility: Stevenson Unit

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 02/07/2025

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: Ron L Kidwell	Date of Signature: 02/07/2025

AUDITOR INFORMATION	
Auditor name:	Kidwell, Ron
Email:	ronnie.kidwell@yahoo.com
Start Date of On-Site Audit:	12/11/2024
End Date of On-Site Audit:	12/13/2024

FACILITY INFORMATION	
Facility name:	Stevenson Unit
Facility physical address:	1525 Farm to Market 766, Cuero, Texas - 77954
Facility mailing address:	2 Financial Plaza Suite 105, Huntsville, Texas - 77340

Primary Contact

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

Warden/Jail Administrator/Sheriff/Director	
Name:	Jacob Harrison
Email Address:	Jacob.Harrison@tdcj.texas.gov
Telephone Number:	361-275-2075x1317

Facility PREA Compliance Manager	
Name:	Johanna Warwas
Email Address:	johanna.warwas@tdcj.texas.gov
Telephone Number:	361-275-2075

Facility Health Service Administrator On-site	
Name:	Crystal Breaux
Email Address:	crshelby@utmb.edu
Telephone Number:	361-275-2075x1254

Facility Characteristics	
Designed facility capacity:	1384
Current population of facility:	1365
Average daily population for the past 12 months:	1374
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Mens/boys

<p>Which population(s) does the facility hold? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)</p>	
<p>Age range of population:</p>	18-73
<p>Facility security levels/inmate custody levels:</p>	G1, G2, G4
<p>Does the facility hold youthful inmates?</p>	No
<p>Number of staff currently employed at the facility who may have contact with inmates:</p>	194
<p>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</p>	24
<p>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</p>	133

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

Agency Chief Executive Officer Information:	
Name:	Bryan Collier

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

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

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

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-12-11
2. End date of the onsite portion of the audit:	2024-12-13

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	The Auditor contacted Just Detention and the previous victim advocate for the Texas Department of Criminal Justice Stevenson Unit (Mid-Coast Family Services)

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1384
15. Average daily population for the past 12 months:	1374
16. Number of inmate/resident/detainee housing units:	17
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	1364
19. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	2
20. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	2
21. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	1
22. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	1
23. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	130
24. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	7

<p>25. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>26. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>2</p>
<p>27. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>5</p>
<p>28. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>The Auditor began conducting targeted inmate interviews immediately on the first day of the on-site audit. This was a deviation to the scheduled agenda because the facility was also concluding a ACA audit at the same time. The Auditor was provided a private area to conduct the confidential interviews. All inmates were made available in a timely manner and no inmates refused to be interviewed by the Auditor. All interviews were conducted using the established DOJ interview protocols.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>30. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>194</p>

31. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	133
32. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	24
33. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	The Auditor began conducting random and specialized staff interviews immediately following the completion of the on-site facility tour. The Auditor was provided a private area to conduct the confidential interviews. All staff were made available in a timely manner and no staff refused to be interviewed by the Auditor. All interviews were conducted using the established DOJ interview protocols.

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	21
35. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None

<p>36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Inmates were selected from all housing units, using the inmate cell assignment report. The Auditor went down the list of each housing unit and selected the an inmate's name from all housing units. The Auditor also ensured that a representative sample of inmates based on race, age, and ethnicity were selected.</p>
<p>37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>There were no barriers to interviewing the random or targeted inmates.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>20</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p>40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>2</p>

41. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	2
42. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1
43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	1
44. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	1
45. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	7
46. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	1

<p>47. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>2</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>5</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>49. 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>49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Facility reported no instances of placing any inmate in segregated housing for risk of sexual victimization. This was confirmed through interviews with the staff who supervise inmates in segregated housing, and the Warden.</p>

<p>50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>The Auditor interviewed 20 targeted inmates at the Stevenson Unit. Of those inmates interviewed, 5 reported sexual victimization during the risk screening process, 2 reported sexual abuse, 7 LGB, 1 transgender inmate, 4 physically disabled, and 1 inmate that was limited English proficient. The Stevenson Unit does not house youthful inmates and reported no inmates housed in restrictive housing for high risk of sexual abuse. The Auditor received no correspondences from inmates housed at the Stevenson Unit for this audit through the mail.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>51. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>
<p>52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input 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 ensured that female officers were interviewed to provide their point of view working at this facility.</p>
<p>53. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>54. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The staff were randomly selected by the PREA Auditor. The Auditor chose staff from all shifts, working different assignments, and with different levels of experience. The Auditor also made sure interviews were conducted with a proportionate number of female staff corresponding to the Stevenson Unit's employee demographics.</p>
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Specialized Staff, Volunteers, and Contractor Interviews

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

<p>55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>18</p>
<p>56. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>58. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>59. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

	<input checked="" type="checkbox"/> Other
If "Other," provide additional specialized staff roles interviewed:	The Auditor interviewed a mailroom employee due to the procedure and protocol associated with the agency's outside reporting entity that will accept a sexual abuse allegation, respond back in a timely manner, and the inmate can remain anonymous if they so choose.
61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
61. Enter the total number of VOLUNTEERS who were interviewed:	1
61. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
62. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
62. Enter the total number of CONTRACTORS who were interviewed:	1

<p>62. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</p>	<p><input type="checkbox"/> Security/detention</p> <p><input checked="" type="checkbox"/> Education/programming</p> <p><input type="checkbox"/> Medical/dental</p> <p><input type="checkbox"/> Food service</p> <p><input type="checkbox"/> Maintenance/construction</p> <p><input type="checkbox"/> Other</p>
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<p>63. Provide any additional comments regarding selecting or interviewing specialized staff.</p>	<p>No text provided.</p>
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SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: 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.

<p>64. Did you have access to all areas of the facility?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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Was the site review an active, inquiring process that included the following:

<p>65. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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66. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
67. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
68. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

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

On 12/11/2024, at approximately 1230 hours a PREA audit kickoff meeting was conducted. Present at the meeting was the Warden, Assistant Warden, Major, Captains, Chief of Classification, Region IV Director and twenty-four other administrative or supervisory staff. The inmate population on 12/11/2024 was 1364 inmates. The meeting was designed to create a positive working relationship, place names with faces, and prepare for the next three days. Soon after the conclusion of the meeting the Auditor continued to conduct staff and inmate interviews. At the beginning of the second day the Auditor began the Facility tour. Accompanied by the Warden, Assistant Warden, Major, SPPM, USPPM, and other staff, the tour covered the entire facility over the next 3 hours. The tour covered the Front Entrance, Receiving and Intake, Food Services/Kitchen, Laundry, Gym, Program Classrooms, and seventeen offender housing units. The facility is made up of twenty-seven buildings consisting of eleven administrative/ industrial structures and sixteen offender housing units. There is also one restrictive housing unit that contains seven single occupancy cells. During the facility tour, the Auditor looked at camera placement for possible blind spots and inmate to officer supervision ratio. The Auditor looked at privacy issues, how the toilet and shower areas were configured, and did the inmates have adequate privacy. Also, did staff of the opposite gender announce their presence when entering a housing unit of the opposite sex. The Auditor documented if PREA posters and PREA audit notices were displayed in the housing units and public areas as well. The Auditor noted the number of phones in each unit and if the outside reporting entity contact information was readily available in the housing units. Finally, the Auditor spoke to multiple inmates about if they knew how to report an allegation of sexual abuse. At the Exit-Briefing the Auditor identified several recommendations that was shared with staff that was in attendance. Present at the Exit-

Briefing was the Warden, Assistant Warden, Safe Prisons/PREA Regional Manager (SPPM), USPPM, Major, and Captains.

Documentation Sampling

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

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

Yes

No

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

At the conclusion of the third day of the audit, the Auditor reviewed a total of 59 files. Those files consisted of 38 inmate files, 12 staff personnel files, and 9 investigative files. The inmate files consisted of those inmates that had been previously interviewed during the audit. The staff personnel files were selected from those officers the Auditor had previously interviewed and staff that had been recently hired since the last PREA audit. In the staff personnel files, the Auditor was looking for evidence of an initial criminal history check, institutional references, 5 years background check, PREA training documentation, and PREA refresher training. In regard to inmate files the Auditor would confirm evidence of the PREA Intake Screening taken place within 72 hours, proof of a reassessment, PREA information provided at Intake, and if the inmate received their comprehensive education within 30 days of Intake. Finally, when reviewing the investigative files, the Auditor was looking for a complete administrative investigation. This would include the investigative outcome, retaliation monitoring, if a Sexual Abuse Incident Review was conducted, was the preponderance of the evidence used, victims, witnesses, and perpetrator interviewed among many other factors.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	6	3	6	3
Total	6	3	6	3

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	3	0	3	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	3	0	3	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	3	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	3	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

6

<p>79. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>81. Did your sample of INMATE-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 inmate-on-inmate sexual abuse investigation files)</p>
<p>82. Did your sample of INMATE-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 inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>6</p>
<p>84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>3</p>
<p>87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>3</p>
<p>89. 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>90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
91. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
92. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
93. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
94. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
95. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input type="radio"/> Yes <input checked="" type="radio"/> No

Non-certified Support Staff

<p>96. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
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AUDITING ARRANGEMENTS AND COMPENSATION

<p>97. Who paid you to conduct this audit?</p>	<p><input type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
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<p>Identify the name of the third-party auditing entity</p>	<p>Corrections Consulting Services LLC</p>
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Standards	
Auditor Overall Determination Definitions	
<ul style="list-style-type: none"> • Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions) 	
Auditor Discussion Instructions	
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>	

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) Clarence N. Stevenson Unit Pre-Audit Questionnaire b) TDCJ Executive Directive (ED) 03.03 Safe Prisons Program c) TDCJ Safe Prisons/PREA Plan d) Texas Board of Criminal Justice (TBCJ) PREA Ombudsman Organizational Chart e) Stevenson Unit Organizational Chart <p>Interview:</p> <ul style="list-style-type: none"> 1) Interview with PREA Coordinator

2) Interview with PREA Compliance Manager/Unit Safe Prisons/PREA Manager (USPPM)

Observations made during the On-Site Audit and Document Review

115.11 Provision (a)

The agency has provided two written policies (TDCJ ED 03.03 and TDCJ Safe Prisons). The Safe Prisons/PREA Plan indicates that, "The Texas Department of Criminal Justice (TDCJ) has a zero tolerance for all forms of sexual abuse and sexual harassment of offenders. The TDCJ shall take a proactive approach concerning the detection, prevention, response, and punishment of sexual abuse, including consensual sexual contact while in TDCJ custody. The TDCJ shall be vigilant in establishing a safe environment for staff and offenders at all secure correctional facilities and take immediate action to address the protective needs of offenders who have been victimized. Every attempt shall be made to prevent the sexual abuse and sexual harassment of offenders in accordance with agency policy."

These policies also outline how it will implement the TDCJ's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. Such as employing a PREA Coordinator with enough time and authority to oversee the prisons' efforts to comply with PREA standards and to make their best efforts to comply with an agency staffing plan. Also, to have supervisors conduct unannounced rounds among many other strategies. In addition, the definitions associated with prohibited behaviors are also present in this agency policy. For example, the definition of sexual abuse, sexual harassment, and voyeurism. The policy also addresses sanctions for those who violate the PREA policy with discipline up to, and including, termination. Finally, the TDCJ Safe Prisons/PREA Plan in its entirety incorporates the necessary fundamentals needed to describe TDCJ's approach to detecting, preventing, and responding to allegations of sexual abuse and sexual harassment.

The evidence collected for this provision shows that the agency has a written policy mandating zero tolerance towards all forms of sexual abuse. The policy also outlines the agency's approach to detecting, preventing, and responding to sexual abuse. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.11 Provision (b)

The TDCJ provided an organizational chart that the Auditor reviewed. The Auditor observed that the State PREA Coordinator who is also the TBCJ Ombudsman is subordinate to the Texas Board of Criminal Justice. The TDCJ and all the correctional units that fall under the Department are subordinate to the Texas Board of Criminal Justice. Therefore, the PREA Coordinator falls directly under the supervision and control of the TBCJ. Thus, providing upper-level management positions to develop and implement oversight for all the Texas correctional facilities compliance with PREA standards.

An interview was conducted with the TBCJ's PREA Coordinator and she was asked

whether she felt like she had enough time to manage all her PREA-related responsibilities. The PREA Coordinator stated that she did have sufficient time. She further stated that she coordinates the effort to comply with PREA standards by ensuring that an action plan will be sent out to all unit leadership that will be monitored by the Safe Prison/PREA Program staff. She also stated that she oversees approximately 99 PREA Compliance Managers, which are located at every TDCJ facility. The Safe Prisons/PREA Management Office has a Safe Prisons/PREA Manager. In addition, the PREA Ombudsman' Office has Safe Prison's/PREA Regional Managers that assist and manage their assigned units in their respected region of Texas for PREA compliance. The Auditor considers this next level of supervision to be a significant attribute to the success of PREA compliance in the TDCJ.

The evidence collected for this provision shows that the agency has demonstrated that they employ an upper level PREA Coordinator with enough time and authority to develop, implement, and oversee agency efforts to comply with PREA standards. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.11 Provision (c)

TDCJ is a State Correctional System that operates approximately ninety-nine separate confinement facilities. The agency has provided a written policy in the Safe Prisons/PREA Plan that outlines the responsibilities of the PREA Manager, PREA Regional Manager, and the PREA Unit Manager. The policy governing the PREA Unit Managers states in part that; "The role of the PREA Unit Manager is to coordinate the implementation and monitoring of the Safe Prisons/PREA Program on the unit. The USPPM shall provide training, technical assistance, and support to unit correctional and departmental staff to ensure compliance with the Safe Prisons/PREA Program. The USPPM shall ensure each offender protection investigation (OPI) involving sexual abuse or sexual harassment is reviewed ensuring compliance with TDCJ policies and procedures."

The Unit PREA Managers have specific responsibilities, such as: maintaining necessary documentation of all PREA standard compliance efforts, act as primary facility contacts for the PREA Ombudsman Regional Manager in coordinating compliance, ensure compliance with all PREA relative departmental policies and procedures, and will provide feedback to the Warden and Regional Analyst concerning policies, procedures, or practices that are not in compliance with PREA Standards.

In addition, TDCJ has established the Safe Prisons/PREA Management Office. This Office is responsible for coordinating the facilities/regions comprehensive PREA response including technical and administrative guidance, creation of supporting policies and practices, design and modification of training, programming, investigation, analysis, and interpretation relative to PREA implementation, compliance, and investigation. The office also crafts and orchestrates strategies to ensure appropriate environments/cultures, and enforcement of policies, procedures, practices and standards for the prevention, detection, and reduction of prison rape. Also, ensuring proper reporting, trend evaluation, and provision of recommendations

	<p>for improvement and compliance.</p> <p>An interview was conducted with a PREA Compliance Manager (Unit Safe Prisons/ PREA Manager), and she was asked if she felt she had enough time to manage all the PREA related responsibilities. The PREA Unit Manager stated that, “Yes, she carves out time for PREA and makes it a priority and that she did have sufficient time to perform the duties required.” Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring the agency to have a written policy mandating zero tolerance towards all forms of sexual abuse and sexual harassment and to employ an agency PREA Coordinator.</p>
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115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. Policy and Document Review 2. Pre-Audit Questionnaire 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes <p>The Auditor randomly reviewed 15 of 27 new, and also renewed, contracts since the last audit to include: Private Residential Treatment Centers, Private Transitional Treatment Centers, and Private Secure Confinement Facilities. They were reviewed to determine if the contract language included an obligation for the contractor to adopt and comply with the PREA standards. Through interviews with the PREA Coordinator/ PREA Ombudsman and the Agency Contract Administrator, the Auditor confirmed the Agency has a contract monitor position to ensure that the contractors are complying with the PREA standards. This was also verified by reviewing agency policy and TDCJ Safe Prisons/PREA Plan.</p> <p>During the interview with the Agency's Contract Administrator, it was determined that they must maintain regular contact with every inmate placed in a contracting facility. If there are PREA concerns, agency protocol requires the inmate to be removed from the facility and the facility be allowed time to make corrective actions and address the concerns. Corrective actions are addressed before going back to the facility is</p>

	<p>reconsidered. Notification would also be made to law enforcement.</p> <p>The Contract Administrator has the authority to perform an administrative review if there is any sign of suspected noncompliance. A finding of non-compliance during the administrative review could result in fines, corrective action, contract termination, and referral for criminal charges, if applicable. The Contract Administrator annually collects credentialing documentation for each facility: facility license; staff licenses or certifications; daily schedule; and monitoring reports or the licensing agency's website regarding the facility's status; and tours the facility. New facilities being considered for contracting purposes follow a vetting process, including reference checks with other counties, with all information being presented to the agency's leadership for review and approval.</p> <p>After a careful and detailed review, the Auditor determined that the Agency meets the requirements of the standard.</p> <p>The Texas Department of Criminal Justice performed an agency PREA audit that was finalized and received on November 21, 2024 in the form of a Final PREA Audit Report. In addition, the TDCJ completed a prior agency PREA audit in September 2023. In both cases, the agency was found to have been in compliance with Standard 115.12 by the PREA Auditor with a determination of "meets the standard" as the overall determination. This facility strictly follows the policies, procedures, and protocols established and instituted by the TDCJ.</p>
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115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons PREA Plan b) TDCJ SOP 08.01 (Turnout Roster Management) c) TDCJ AD-11.52 (Security Staffing) d) Stevenson Unit Staffing Plan e) 2024 TDCJ Institutions Division Stevenson Unit Staffing Plan review dated 04/22/2024 f) 2024 TDCJ Stevenson Unit Staffing Plan Review & Statement of Participation dated 04/22/2024

- g) Post Orders for the Major, Captain, Lieutenant, and Sergeant positions
- h) Stevenson Unit Day & Night Turnout Rosters
- i) Housing Units and (RHU) Unannounced PREA Logs

Interviews:

- 1) Interview Warden
- 2) Interview PREA Coordinator
- 3) Interview with Intermediate or higher-level Facility Staff

Observations made during the On-Site Audit and Document Review

115.13 Provision (a)

TDCJ Safe Prisons PREA Plan states that; "The TDCJ shall ensure each unit develops, documents, and complies with a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect offenders against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, units shall take into consideration TDCJ policies and procedures, and:

- a. Generally accepted detention and correctional practices.
- b. Any judicial findings of inadequacy.
- c. Any findings of inadequacy from federal investigative agencies.
- d. Any findings of inadequacy from internal or external oversight agencies.
- e. All components of the unit's physical plant, including "blind spots" or areas where staff or offenders may be isolated.
- f. The composition of the offender population.
- g. The number and placement of supervisory staff.
- h. Institutional programs occurring on a particular shift.
- i. Any applicable state or local laws, regulations, or standards.
- j. The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- k. Any other relevant factors."

Since the last PREA audit, the average daily population of inmates at the Stevenson Unit was 1374 and the current staffing plan was predicated on the TDCJ System II staffing plan of over a thousand inmates housed at a facility.

During the interview with the Warden, he was asked if the facility had a staffing plan and if staffing levels to protect inmates from sexual abuse was considered in the plan.

Also, if video monitoring is part of this plan and if the staffing plan is documented? The Warden confirmed, "Yes" to the first question and explained that an annual review and development of all staffing plans are conducted through the Security Operations Department. The Warden also confirmed that when reviewing the staffing plan on an annual basis they consider all of the above matters. The Auditor also interviewed the Unit Safe Prisons/PREA Manager (USPPM) and asked if the above considerations are weighed when developing the staffing plan. The coordinator explained that they were considered. The staffing plan is developed for 158 full-time security staff, 24 security supervisors, and 7 security administrators. Finally, the facility provided a copy of the staffing plan review and acknowledgement form that indicates that the Regional Director, Warden Director of Security Operations, and PREA Ombudsman reviewed and signed off on the Stevenson Unit staffing plan.

During the on-site facility tour, the Auditor looked for potential blind spots, camera placement, and understaffing or overcrowding situations.

The evidence collected for this provision shows that the agency has a written policy that addresses appropriate staffing plans and reviews. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.13 Provision (b)

TDCJ Safe Prisons PREA Plan states in part that; "In circumstances where the staffing plan is not complied with, the unit shall document and justify all deviations from the plan." In addition, policy dictates the when occasions arise requiring the unit to deviate from the staffing plan, unit administration will document on the shift turnout roster the position deviation taken and the reason for the deviation.

During the interview with the Warden, he was asked if the facility documents all instances of non-compliance with the staffing plan. The Warden stated that, "Yes, it is documented and the explanation for not meeting the plan must be justified on the backside of the roster." The facility reported no instances of not complying with the staffing plan during the audit period.

The Stevenson Unit listed the top five reasons for non-compliance in the staffing plan annual review as follows:

- Staff Shortages
- Constant direct observation
- Security observations
- Inmate transport
- Hospital Security details

The evidence collected for this provision shows that the agency has a written policy that addresses documenting situations where staffing plans are not met. Therefore,

through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.13 Provision (c)

TDCJ Safe Prisons PREA Plan states in part that; “Each unit the TDCJ operates shall complete an assessment, whenever necessary, but no less frequently than once each year in consultation with the CID director, who serves as the PREA coordinator, and the TDCJ SPPM, to determine and document if the following require adjustments:

- a. The staffing plan established pursuant to paragraph 1 of this section.
- b. The unit’s deployment of video monitoring systems and other monitoring technologies; or
- c. Resources the unit has available to commit to ensure adherence to the staffing plan.”

The Stevenson Unit has provided the 2022, 2023, and 2024 Staffing Plan Review and Participation Statement documenting whether adjustments are needed to the staffing plan.

During the PREA Coordinator interview, the coordinator was asked if she is consulted regarding any assessments or adjustments to the staffing plan. The coordinator stated that the staffing plan is reviewed yearly with the Regional Director and that the PREA Coordinator must review and sign off on all staffing plan documentation.

The evidence collected for this provision shows that the agency has a written policy that addresses performing annual staffing plan reviews. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.13 Provision (d)

TDCJ Safe Prisons PREA Plan states in part that; “Security supervisors at each unit shall conduct and document unannounced rounds to identify and deter sexual abuse and sexual harassment. These rounds shall be conducted during all shifts in accordance with applicable post orders. Staff is prohibited from alerting other staff members when these rounds are occurring unless the announcement is related to the legitimate operational functions of the unit. Violations shall be handled in accordance with PD-22, “General Rules of Conduct and Disciplinary Action Guidelines for Employees.”

During the facility tour, the Auditor reviewed examples of the Stevenson Unit PREA Supervisor Unannounced logbooks from multiple housing units, kitchen, and infirmary spanning over the last year. These logbooks cover both day and night shift. The unannounced log pages identify and document unannounced rounds by supervisors across all shifts at separate housing units during different times of the tour of duty. The Auditor reviewed every duty post log on security posts during the site review tour confirming that these unannounced rounds are being conducted.

	<p>During the interview process, the Auditor interviewed an intermediate or higher-level supervisory staff member (Captain) about unannounced rounds. The supervisor was asked if he conducted unannounced rounds and if he documented those rounds. The supervisor stated that, "Yes, he performs unannounced rounds and that they are documented on the 'Unannounced Rounds Logbook.'" When asked how the supervisor 'would prevent staff from alerting other staff members about unannounced rounds?' The supervisor responded that he staggers both his rounds and what buildings he enters at random times.</p> <p>The evidence collected for this provision shows that the agency has a written policy that addresses performing unannounced rounds. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring the agency to have supervision and monitoring.</p>
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115.14	Youthful inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons PREA Plan b) TDCJ Unit Classification 4.19 (Youthful Offenders) c) Stevenson Unit Senior Warden Statement of Fact referencing standard 115.14 provision (a) dated 10/25/2024 <p>Observations made during the On-site Audit and Document Review</p> <p>115.14 Provision (a)</p> <p>TDCJ Safe Prisons PREA Plan states that, "In accordance with the TDCJ Classification Plan and TDCJ Unit Classification Procedures Manual, youthful offenders shall not be placed in a housing unit where the youthful offenders will have sight, sound, or physical contact with any adult offenders through use of a shared dayroom or other common space, shower area, or sleeping quarters."</p> <p>The Stevenson Unit Warden provided a "Statement of Fact" that explains that the</p>

Stevenson Unit does not nor has not housed any youthful inmates during this audit period.

115.14 Provision (b) &(c)

TDCJ Safe Prisons PREA Plan states in part that, "In accordance with the TDCJ Classification Plan and TDCJ Unit Classification Procedures Manual, youthful offenders shall not be placed in a housing unit where the youthful offenders will have sight, sound, or physical contact with any adult offenders through use of a shared dayroom or other common space, shower area, or sleeping quarters."

"When youthful offenders are outside the housing areas, correctional staff shall:

a. Maintain sight and sound separation between youthful offenders and adult offenders; or

b. Provide direct supervision when youthful and adult offenders have sight, sound, or physical contact.

The TDCJ shall make its best efforts to avoid placing youthful offenders in isolation for the purposes of maintaining sight and sound separation. Youthful offenders' daily large muscle exercise and any legally required special education services required to comply with this provision shall not be denied, except in exigent circumstances. Youthful offenders shall also have access to other programs and work opportunities to the extent possible."

The Stevenson Unit is not authorized to hold or house youthful inmates, in accordance with the Warden's memorandum dated 10/25/2024. The Stevenson Warden's memo indicates that, "The facility does not house inmates under the age of 18. If the TDJC receives a youthful inmate into the system then that inmate is housed at the Ellis Unit for males and the Hilltop Unit for females." Therefore, this standard is not applicable.

During the on-site tour of the physical plant, the Auditor did not witness any youthful inmates housed in the general or restricted housing units. After conducting 72 interviews with staff and inmates, there was no evidence to suggest that the Stevenson Unit houses youthful inmates. Also, no interviews were conducted for this standard because there have been no incidents involving youthful inmates. Therefore, this standard is not applicable, however, the agency does have policies and procedures in place to manage youthful inmates when these situations occur.

Conclusion:

Based upon the review and analysis of all the available evidence the PREA Auditor has determined that the facility is fully compliant with this standard.

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

The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:

Documents:

- a.) TDCJ Safe Prisons PREA Plan
- b.) TDCJ Administrative Directive AD-03.22 (Offender Searches)
- c.) TDCJ Post Orders PO-07.006 (Post Orders)
- d.) TDCJ Safe Prisons/PREA Plan In-Service training curriculum
- e.) TDCJ Security Memorandum SM-02.25 (On-The-Job Training Program)
- f.) TDCJ Executive Directive ED-12.10 (Training Database)
- g.) Statement of Fact by the Stevenson Unit Warden dated 10/25/2024 regarding no instances of Cross-Gender Viewing & Searches

Interviews:

- 1) Interviews with Random Staff
- 2) Interviews with Random Inmates
- 3) Interview with Non-Medical Staff involved with strip searches

Observations made during the On-Site Audit and Document Review

115.15 Provision (a)

The Stevenson Unit is situated on a complex with multiple podular and two dorm style housing units in a rural area in the city of Cuero TX. The facility houses male inmates only. TDCJ Safe Prisons PREA Plan states in part that; "Staff shall not conduct cross-gender strip searches or cross-gender visual body cavity searches, such as a search of the anal or genital opening, except in exigent circumstances or when performed by medical practitioners in accordance with AD-03.22, Offender Searches." TDCJ policy further addresses the necessity to strip search inmates to ensure staff and inmate safety and to detect the presence of contraband. Finally, the policy addresses under what circumstances, how to proceed, what staff can authorize, and who will perform visual body cavity searches.

There are no examples of exigent circumstances in the last 12 months, because it is against policy and there are no female inmates housed at this facility. When conducting the on-site review of the facility, the Auditor observed adequate female staff to accommodate any day-to-day operations involving gender specific searches. When interviewing the non-medical staff responsible for conducting strip searches, the officer was asked under what circumstance would it require a cross-gender strip search. The officer replied that she could not think of any circumstance that would

constitute the need to cross gender strip-search an inmate of the opposite gender unless in a life-threatening situation.

The evidence collected for this provision shows that the agency has a written policy that prohibits staff from conducting cross-gender strip searches or cross-gender visual body cavity searches except in exigent circumstances when performed by medical practitioners. The interview with the non-medical staff member that conducts strip searches confirmed the practice during the interview. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.15 Provision (b)

TDCJ policy governs how inmates are routinely searched using the visual and pat search technique in accordance with existing post orders and policies. The policy further indicates that female inmates will be pat searched by a female correctional officer or trained female staff member.

As stated previously, the Stevenson Unit does not house female inmates. There are no examples of exigent circumstances over the last 12 months, because it is against policy and no female inmates are housed at the Stevenson Unit. When conducting the on-site review of the facility, the Auditor observed adequate female staff to accommodate any day-to-day operations involving gender specific pat searches if necessary.

During the on-site phase, the Auditor interviewed 12 random staff members from both day and night shifts. There was no need to ask questions concerning female inmate searches, and the possible lack of inmate privileges associated with the need for female officers to search such inmates, because the facility does not house female inmates.

The evidence collected for this provision shows that the agency has a written policy that prohibits staff from conducting cross-gender pat searches except in exigent circumstances. The interviews conducted with staff confirmed that there have not been incidents where female inmates have been limited to activities due to the shortage of female officers. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.15 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; “ Unit staff shall document all cross-gender strip searches and cross-gender visual body cavity searches for male offenders, and all cross-gender visual body cavity searches or pat-down searches for female offenders. These searches shall be documented on an Inter-Office Communication containing a supervisor’s signed approval and filed with the USPPM.”

The Stevenson Unit Warden provided a memo dated 10/25/2024, that indicates there were no examples of these situations during the audit rating period.

The evidence collected for this provision shows that the agency has a written policy

that prohibits staff from conducting cross-gender strip searches and cross gender visual body cavity searches, except in exigent circumstances when performed by medical practitioners. Therefore, through written policy, the facility has demonstrated that it meets this provision.

115.15 Provision (d)

TDCJ Safe Prisons PREA Plan states in part that; "Correctional officers shall make best efforts to allow offenders to shower, perform bodily functions, and change clothing without 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. Staff of the opposite gender shall announce their presence when entering an offender housing area in accordance with applicable post orders. Under no circumstances shall an offender search be conducted solely for the purpose of determining an offender's genital status." The "Post Orders" directs the cellblock officer, that they must announce their presence when entering the cellblock if the cellblock officer is of the opposite gender of the inmates housed in the cellblock housing area.

When conducting the site review, the Auditor observed half-wall partitions separating toilets from view, shower curtains or half doors for privacy when showering, and monitoring screens with pixelated screens, or cameras positioned away from these specific areas so staff could not view inmates when using the restrooms or showers. The Auditor also witnessed officers announce their presence when entering a housing block of inmates of the opposite sex. Finally, the facility provided the Auditor with facility post logs with notations made by officers documenting their opposite gender announcements.

During the on-site phase, the Auditor interviewed both random staff and inmates. The 12 random staff were asked if they, or other officers, announce their presence when entering a housing unit of inmates of the opposite sex. All 12 officers stated that they do. When asked if inmates can dress, shower, and use the restroom without being viewed by officers of the opposite sex, 12 officers stated yes. The Auditor also interviewed 20 random inmates and 21 targeted inmates. When asked if female officers announce their presence when entering the housing block of the opposite sex: 36 inmates stated yes, 3 inmates indicated sometimes, and 1 inmate stated no. When asked if they, or other inmates, are ever naked in full view of female officers all 41 inmates stated, no that they are not.

The evidence collected for this provision shows that the agency has a written policy that enables inmates to shower, perform bodily functions, and change clothes without being viewed by staff of the opposite sex. They also have a policy that requires all staff to announce their presence when entering a housing unit of inmates of the opposite sex. The interviews conducted with random staff and inmates confirmed that staff is practicing these policies. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.15 Provision (e)

	<p>The Safe Prisons PREA Plan indicates that searches of all inmates shall be conducted in a professional and respectful manner and in the least intrusive manner as possible, in accordance with training regarding conducting searches and security needs. No search of a transgender or intersex inmate shall be conducted for the sole purpose of determining the inmate’s genital status.</p> <p>When interviewing random staff, they were asked if they were aware of the agency policy prohibiting staff from searching or physically examining a transgender person for the sole purpose of determining the inmate’s genital status. All random officers stated that yes, they are aware and searching for the sole purpose of identifying gender is prohibited. The facility reported one transgender inmate being housed at the Stevenson Unit at the time of the on-site audit phase. The Auditor was able to interview that transgender inmate and confirmed that they had not experienced a situation where they were searched for the sole purpose of determining the inmate’s genital status.</p> <p>115.15 Provision (f)</p> <p>The Stevenson Unit does not conduct cross-gender pat searches unless exigent circumstances exist. The facility provided training records and training curricula as proof of receiving training on cross-gender pat searches and searches of transgender and intersex inmates in a professional manner. During the on-site review, the Auditor interviewed 12 random staff and in those interviews the officers were asked if they had received training on how to conduct a cross-gender pat search and when did they received the training. All 12 officers indicated that they had received the training. From those interviews, the 12 officers stated that they received the training during annual in-service, the academy, and during “Turn-out” which is the term the facility uses to describe their daily roll-call meetings.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring the agency to have limits on cross-gender viewing and searches.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p>

- a) TDCJ Safe Prisons PREA Plan
- b) TDCJ Intake Procedures 6.05
- c) PREA Zero-Tolerance Posters in both English & Spanish
- d) PREA Informational Posters in both English & Spanish
- e) TDCJ Safe Prisons PREA Program Brochure in English & Spanish
- f) Safe Prisons PREA Handbook in Braille
- g) PREA video script in English & Spanish
- h) TDCJ Security Memorandum SM-05.50 (Qualified Spanish Interpreter Guidelines)
- i) Language Line Quick Reference Guide to access an Interpreter
- j) Stevenson Unit List of Staff Spanish Interpreters
- k) Inmate PREA educational video in both English & Spanish

Interviews:

- 1) Agency Head
- 2) Random Staff
- 3) Inmates with Disabilities or limited English proficient

115.16 Provision (a)

The TDCJ Safe Prisons PREA Plan states in part that; "Appropriate steps shall be taken to ensure offenders with disabilities, including offenders who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities, have an equal opportunity to participate in or benefit from all aspects of TDCJ efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Staff shall provide access to qualified interpreters, when necessary, to ensure effective communication with offenders who are deaf or hard of hearing. Written materials shall be provided in accordance with TDCJ policies and procedures, to ensure effective communication with offenders with disabilities, limited reading skills, or who are blind or have low vision."

The facility has provided documentation of the Texas Correctional Managed Health Care Committee (CMHCC). The University of Texas Medical Branch (UTMB) in partnership with the Texas Tech University Health Sciences Center (TTUHSC) and TDCJ provides health care services to Texas prison inmates. The UTMB provides 78% of all medical services with TTUHSC providing the other 22% of services. The facility reported that they contract with these medical facilities, and they provide services for those inmates with disabilities and special needs. The Byrd unit is one of the intake facilities for the TDCJ and if an inmate has any type of disability, the intake facility will find the right unit to assist the needs of that inmate. The facility also provided a HSL

Facility Types List. This lists the type of specialties each Unit may provide. The facility also provided examples of the PREA orientation script in Braille.

The Agency Head was interviewed and asked if his agency has established procedures to provide inmates with disabilities and inmates who are limited English so they can participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The Agency Head stated that, "Yes, his agency has published information in Spanish, made accommodations for people with disabilities, (braille) and people with hearing disabilities. The Department provides for sign language interpreters and has contracts for language translation services."

The Auditor interviewed four inmates that were disabled. Two inmates were physically disabled, and two inmates were cognitively disabled. All disabled inmates were asked if the facility provided information about sexual abuse that they were able to understand, and if not, did the facility provide someone to help, write, read, or explain? Also, did the inmates understand the information that was provided? The inmates stated, "Yes" to the question regarding PREA information that they could understand and, "No" to were these inmates that needed assistance to read, write, or explain their rights under PREA.

The evidence collected for this provision shows that the agency has a written policy that addresses that the facility takes 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 or sexual harassment. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.16 Provision (b)

The Safe Prisons PREA Plan states in part that; "Offenders with limited English proficiency shall be provided meaningful access to information regarding TDCJ efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary."

The agency has provided documentation of a contract between The Language Line Services Inc. and the TDCJ to provide interpreting services. The facility provided a Spanish-Inmate PREA Training Acknowledgement form that the inmate signs acknowledging receiving the PREA training. During the site review, the Auditor observed the PREA Posters located in the housing units both in English and Spanish. The facility also provides a Stevenson Unit Facility Handbook and Brochure in Spanish. Finally, the Facility has provided a certified list of bilingual staff that are qualified to interpret when needed.

The Agency Head was interviewed and asked if his agency has established procedures to provide inmates with disabilities and inmates who are limited English so they can participate in or benefit from all aspects of the agency's efforts to

prevent, detect, and respond to sexual abuse and sexual harassment. The Agency Head stated that, "Yes, his agency has published information in Spanish, made accommodations for people with disabilities, (braille) and people with hearing disabilities. The Department provides for sign language interpreters and has contracts for language translation services."

The Auditor interviewed one inmate that was limited English proficient. The inmate reported that he was given literature in Spanish, the educational video was provided in Spanish to him, and that PREA posters in the housing unit were also available in Spanish.

The evidence collected for this provision shows that the agency has a written policy that addresses that the agency takes appropriate steps to ensure that inmates who are "limited English proficient" 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 or sexual harassment. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.16 Provision (c)

The TDCJ Safe Prisons PREA Plan states in part that; "When seeking interpreters, staff shall not rely on offender interpreters, offender readers, or other types of offender assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the offender's safety, the performance of first-response duties described within this plan, or the investigation of the offender's allegations. Staff shall follow appropriate TDCJ policies and procedures for obtaining a qualified interpreter."

During the audit interview process, the Auditor asked 12 random staff if the facility ever allows the use of inmate interpreters. From that, 10 officers stated that they would not use inmate interpreters, and 2 officers stated that they would. When asked further about when and how, the 2 officers indicated that they would use inmate interpreters when they could not communicate with the inmate due to the language barrier. Also, to the best of their knowledge, they had never witnessed an inmate interpreter being utilized to assist in a sexual abuse allegation.

The evidence collected for this provision shows that the agency has a written policy that addresses that the facility shall not rely on inmate interpreters. Therefore, through written policy, observations, and interviews conducted the facility has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard referencing requirements for inmates with disabilities and inmates who are limited English proficient having equal opportunity or benefiting from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

115.17	Hiring and promotion decisions
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 297">Auditor Discussion</p> <hr/> <p data-bbox="256 340 1075 374">Evidence relied upon to make Compliance Determination:</p> <ol data-bbox="256 412 730 663" style="list-style-type: none"> <li data-bbox="256 412 703 445">1. Policy and Document Review <li data-bbox="256 483 632 517">2. Pre-Audit Questionnaire <li data-bbox="256 555 695 589">3. TDCJ Safe Prisons/PREA Plan <li data-bbox="256 627 730 660">4. Specialty Staff Interview Notes <p data-bbox="256 698 1474 1151">Texas Department of Criminal Justice, as an Agency, has not hired or promoted anyone who may have contact with inmates who has engaged in sexual abuse in; a prison, jail, lockup, community confinement facility, juvenile facility, or other lock up institution. The Agency has not enlisted the services of any contractor who may have contact with inmates who has engaged in sexual abuse in; a prison, jail, lockup, community confinement facility, juvenile facility, or other lock up institution. The Agency has not hired or promoted or used the services of anyone who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity as described.</p> <p data-bbox="256 1189 1434 1350">The Agency policies and TDCJ Safe Prisons/PREA Plan prohibit the agency/facilities from hiring, promoting or during business with a person or business who may have contact with inmates who has engaged in or attempted to engage in sexual abuse while in incarcerated, or convicted of, civilly or administratively of the same.</p> <p data-bbox="256 1388 1469 1630">The Auditor verified this by reviewing new hire applicant packets as well as reviewing multiple personnel files that included criminal background checks and self-disclosure forms. During the personnel file review, the Auditor found this same process of checking backgrounds is also completed when starting new vendor contracts and when qualifying staff for in-house promotions. All files reflected the three required questions included and staff affirmed by signing the form.</p> <p data-bbox="256 1668 1482 1995">Before hiring new employees, who may have contact with inmates, the central headquarters staff (1) performs a criminal background records check; and (2) consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. The Administrative (Human Resources) Staff also indicated that the Agency would respond to any request for information from an institutional employer seeking information on a former TDCJ employee.</p> <p data-bbox="256 2033 1410 2067">The central headquarters staff also conducts criminal background records checks</p>

annually of current employees and contractors who may have contact with inmates. This is accomplished by using a system called FACT Clearinghouse, this system allows for a continual real-time update on staff interactions with law enforcement agencies who participate in the service. Agency policies also require an annual re-check of all employees and contractual re-checks for contractors. The agency policy does indicate that any employee/contractor misconduct or false reporting is subject to termination of employment. The current policy also requires that staff self-disclose new information related to sexual conduct behavior. The Agency has incorporated and implemented the "Affirmative Duty to Disclose" which all staff were required to affirm and sign. Failure to self-disclose new sexual conduct behavior are grounds for termination. The Agency reports conducting approximately 700 such criminal background checks monthly. Finally, as a requirement of policy and TDCJ Safe Prisons/ PREA Plan the facility has an obligation to report sexual conduct behavior to other institutional employers. These processes were verified through interviews with the headquarters human resource staff and informal conversation with administrative staff.

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

The Texas Department of Criminal Justice performed an agency PREA audit that was finalized and received on November 21, 2024, in the form of a Final PREA Audit Report. In addition, the TDCJ completed a prior agency PREA audit in September 2023. In both cases, the agency was found to have been in compliance with Standard 115.17 by the PREA Auditor and a determination of "meets the standard" as the overall determination. This facility strictly follows the policies, procedures, and protocols established and instituted by the TDCJ.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) Stevenson Unit Warden Statement of Fact dated 11/22/2024 documenting no substantial expansions or modifications made to the facility nor the facility's monitoring technology system. b) TDCJ Safe Prisons PREA Plan c) Stevenson Unit List of Camera System

Interviews

- 1) Interview with Agency Head
- 2) Interview with Warden

Observations made during the On-Site Audit and Document Review

115.18 Provision (a)

TDCJ Safe Prisons PREA Plan states in part that; “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.”

The facility has not acquired or made a substantial expansion or any modifications to the existing facility since the last PREA audit in 2021.

During the audit interview phase, the Agency Head was asked that when planning substantial modifications to a facility, “How does the agency consider such changes on its ability to protect inmates from sexual abuse?” The Agency Head stated that once a year he meets to discuss staffing plans, additional camera placements, and the budget.” In addition, the Warden was also asked the same question. The Warden stated, “There had been no changes or current renovations to the facility.”

The evidence collected for this provision shows that the agency shall consider the effect of such design to improve the ability to protect inmates from sexual abuse. Therefore, through personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

Provision B:

TDCJ Safe Prisons PREA Plan states in part 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.”

The agency has provided a statement of fact authored by the Facility Warden stating that there has been no substantial modifications or installing and/or updating video monitoring technology to the facility since the last PREA audit.

During the audit interview phase, the Agency Head was asked how the agency uses monitoring technology. The Agency Head stated that, “The agency just started issuing body worn cameras to four units and that a total of twenty-three units will be completed by the end of the year.” The Agency Head indicated that all uniform security staff will eventually have body worn cameras issued to them. This will consist of approximately twelve thousand body worn cameras. The Warden was also asked a similar question about how the facility had considered using technology to enhance inmates’ protection from sexual abuse. The Warden indicated that the facility currently has a limited amount of cameras at the unit and is trying to obtain a

	<p>complete video security upgrade when financially feasible by the TDCJ.</p> <p>The evidence collected for this provision shows that the agency has considered how technology may enhance the facility’s ability to protect inmates from sexual abuse. Therefore, through written memorandums, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined that the agency is fully compliant with this standard addressing upgrade to facilities and technology.</p>
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115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons PREA Plan b) TDCJ Administrative Directive AD-16.03 (Evidence Handling) c) Correctional Managed Health Care Policy Manual (CMHC) d) Texas Board of Criminal Justice (TBCJ) Office of Inspector General (OIG) Policy 7.13 (Inmate Sexual Assault Investigations) e) Emails requesting & declining advocate partnership with Mid-Coast Family Services f) Offender Victim Representative Training Curriculum g) Offender Victim Representative Training Handouts h) TDCJ Employee Training History <p>Interviews</p> <ul style="list-style-type: none"> 1) Interview with SANE/SAFE staff 2) Interview with the Unit Safe Prisons PREA Manager 3) Interviews with random staff

4) Interview with inmates reported sexual abuse

Observations during on-site Facility tour.

115.21 Provision (a)

TDCJ Safe Prisons PREA Plan states in part that; "All allegations of sexual abuse shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions." The TBCJ further addresses when a criminal act may have occurred, the TDCJ will ensure the implementation of evidence handling and crime scene protection/preservation procedures in accordance with the directive. The policy directs all employees to take necessary steps to protect life and property as well as to the protection, preservation, and collection of physical evidence. The TBCJ OIG Policy indicates that the OIG will comply with PREA Standards. The TBCJ Office of Inspector General is an independent office within the TDCJ that investigates allegations of misconduct and criminal activity. The OIG Investigators are licensed peace officers.

During the review phase of the Pre-Audit Questionnaire, the Auditor reviewed standard 115.21 and noted that the TBCJ OIG investigators are responsible for all criminal investigations that occur on the grounds owned and operated by the TDCJ. The Auditor contacted a TBCJ OIG investigator to establish if they did in fact conduct alleged sexual assault criminal investigations at the Stevenson Unit. Arrangements were made by the Auditor to contact an OIG investigator while on-site for an interview. The investigator informed the Auditor that they do in fact investigate all criminal sexual assault allegations and acknowledged that the only requirement needed to send an investigator is an official request from the Facility Leadership. The OIG is responsible for investigating allegations of sexual crimes that occur within the TDJC facilities and is familiar with PREA Standard 115.21 pertaining to the investigation of sexual assaults, the collection of evidence, and forensic examinations. Furthermore, the OIG is also responsible for conducting administrative sexual abuse investigations when it involves staff-on-inmate allegations.

When the Auditor interviewed random staff, it was determined that 11 staff members were aware of their responsibilities to preserve evidence during a sexual abuse allegation. They discussed securing the scene, notifying a supervisor immediately, contacting medical personnel, placing clothing in a brown paper bag, writing a detailed report, and not allowing the victim or accuser to bathe or brush their teeth. Also, when asked who was responsible for investigating criminal and administrative cases; staff members identified the TBCJ OIG 1 time, the USPPM 8 times, a Captain or above 3 times, and two officers were not sure. All random staff interviewed were therefore aware of the protocol for evidence collection and the majority of sworn staff were able to identify the investigator responsible for conducting the administrative investigation. The USPPM does conduct an initial inquiry to determine what the allegation is and if it appears to be a legitimate allegation. If the allegation is indeed a sexual abuse allegation then that information is forwarded to the Warden and Safe Prisons/PREA Management Office to assign to the OIG for investigation. If it is determined that the allegation is sexual harassment, then the facility is responsible to

investigate the allegation.

The evidence reviewed for this provision shows that the agency has demonstrated that they do follow a uniform evidence protocol for obtaining physical evidence for administrative and criminal proceedings. Therefore, through written policy, and interviews conducted, the agency has demonstrated that it meets this provision.

115.21 Provision (b)

The facility did not house youthful inmates in their facility over the audit rating period. The Facility provided the Safe Prisons PREA Plan which states in part that; "The protocol shall be developmentally appropriate for youth, where applicable, and, as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice Office on Violence against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011. The requirements of evidence protocol and forensic medical examinations shall also apply to any State entity outside of the agency that is responsible for investigating allegations of sexual abuse in prisons or jails; and any Department of Justice component that is responsible for investigating allegations of sexual abuse in prisons or jails."

The Stevenson Unit utilizes the TBCJ OIG to conduct all criminal investigations within the facility. The facility provided policy that indicates all OIG Investigators are certified law enforcement officers through the Texas Board of Criminal Justice. In addition, the policy listed above would suggest that all necessary protocols would be adapted and followed on the most recent edition of the Department of Justice (DOJ's) Office on Violence Against Women publication in accordance with this standard.

The evidence reviewed for this provision shows that the agency has demonstrated that they do follow a protocol that is developmentally appropriate for youth. Therefore, through written policy, and interviews conducted, the facility has demonstrated that it meets this provision.

115.21 Provision (c)

The facility offered the TBCJ OIG Policy that instructs the OIG that when notified of a sexual abuse within 120 hours, investigators would be immediately sent to the scene to initiate an investigation, interview the victim, determine if a forensic medical examination will be offered, and examine and process the crime scene. If the sexual assault is reported to the OIG, with the consent of the victim, an investigator will request a forensic medical examination of the victim of the alleged assault for use in the investigation or prosecution of the offense. The policy further addresses how hospitals will be reimbursed for sexual assault medical exams

Any allegations of sexual abuse that appears criminal will be referred to the TBCJ OIG for criminal investigation. The alleged victim shall be immediately transported to the closest hospital in the region where a SANE Nurse is available. Those local hospitals for the Stevenson Unit are the Detar Hospital in Victoria, TX, Methodist Hospital

Specialty and Transplant in San Antonio, TX, and Doctors Regional Hospital in Corpus Cristi, TX. A SANE Nurse is a medical professional who is skilled and experienced in the use of rape kits for the collection of forensic evidence.

The Methodist Hospital is a licensed health care facility that will provide health care services to inmates housed in a state or local correctional institution. An inmate who is a victim of an alleged sexual abuse may be transported to a regional hospital for a sexual assault forensic examination. The Methodist Hospital contracts with the TXFNE who employs one or more staff members trained in sexual assault examination. The hospital agrees that any such examination will be performed by a nurse trained in sexual assault examination under the direction of a physician.

During the post-audit phase, an interview was conducted by the Auditor with a Sexual Assault Nurse Examiner (SANE). The interview was conducted by phone with a SANE Nurse Supervisor employed with the TXFNE in San Antonio, TX. A SANE nurse is a highly skilled certified nurse trained in the art of evidence collection and chain of custody. The nurse is considered the subject matter expert in collecting evidence after an alleged sexual assault has occurred. The nurse is also required to provide testimony in court cases related to sexual abuse. The Nurse explained that she is aware of agreements between the TDCJ and regional hospitals when it comes to conducting SANE exams. She explained that the TXFNE conducts SANE exams for the surrounding jurisdictions. She informed the Auditor that they are contracted with the Methodist Hospital when an individual is in need of a forensic medical examination. When asked if the TXFNE are responsible for conducting all forensic medical exams for inmate victims of sexual abuse for Stevenson Unit, the SANE Nurse stated, "Yes, they are the responsible party that offers forensic medical examinations and would provide those services for the surrounding correctional facilities if requested by law enforcement." When asked if SANE staff is unavailable to conduct forensic medical examinations, then who assumes the responsibility? The SANE Nurse replied, "That her medical facility is available and that nurses are always on call 7 days a week 365 days a year." Therefore, if there is a lapse in coverage, or unavailability, then the inmate victim would be taken to the next closest regional hospital that offers forensic medical examinations. The facility reported no incidences of a SANE examination being performed during this auditing period.

The evidence collected for this provision shows that the agency has procedures in place to offer all victims of sexual abuse access to forensic medical examinations at an outside facility, without financial cost to the victim. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.21 Provision (d)

TDCJ Safe Prisons PREA Plan states in part that; "Attempts shall be made to make a victim advocate from a rape crisis center available to the offender victim first. If a rape crisis center is not able to provide the offender with victim advocate services, the unit shall make available a qualified staff member from a community-based organization. If a qualified staff member from a community-based organization is not

able to provide the offender with victim advocate services, the unit shall make available a qualified TDCJ staff member to provide the offender with victim advocate services." The policy further states that, "For the purposes of this section, a qualified TDCJ staff member is an offender victim representative (OVR).

The warden shall designate at least two OVRs. An OVR shall be a mental health clinician, sociologist, chaplain, social worker, or case manager who has completed the TDCJ Sexual Assault Offender Victim Representative training. Wardens shall coordinate with the SPPMO when a newly designated OVR requires training. The function of an OVR shall not begin until such training is received."

The Facility has provided multiple emails between the TDCJ Safe Prisons/PREA Management Office, the Stevenson Unit, and the Mid-Coast Family Services. There was an existing Memorandum of Understanding between these entities until July 1, 2024, when the Mid-Coast Family Services requested to terminate the partnership for advocacy with the Stevenson Unit. The Stevenson Unit has provided evidence that two TDCJ staff members have completed the Offender Victim Representative training required to act as an advocate. The facility provided the victim representative training, handouts and certificates of completion as proof of compliance.

The USPPM was interviewed by the Auditor and stated that staff would allow access to a victim advocate if the inmate requested. The USPPM also stated that the facility provided training to two staff members in victim advocacy. The Auditor interviewed two inmates that had reported sexual abuse in the facility. However, in both incident it was determined that the allegations did not rise to the level that a SANE examination was warranted given the circumstance.

The evidence collected for this provision shows that the facility has demonstrated that they do offer services from a qualified agency staff member for inmate victim advocacy regarding a sexual abuse allegation. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.21 Provision (e)

The facility has provided TDCJ Safe Prisons PREA Plan, which states in part that; "As requested by the offender victim, the victim advocate or qualified TDCJ staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews, provide emotional support, crisis intervention, information, and referrals; and not delay or otherwise impede the screening or stabilization of an emergency medical condition." TBCJ OIG Policy directs that all victims of a sexually related offense are entitled to have a Sexual Assault Program Advocate or other Victim's Representative present prior to being interviewed by law enforcement.

The facility has provided evidence of training two staff members in "offender victim representative" training as guidance addressing when a victim advocate can accompany an alleged sexual assault victim through the forensic examination, during the investigatory interview process, providing emotional support, crisis intervention,

information, and referrals.

The Facility reported that the Stevenson Unit had no instances requiring a victim advocate during a medical forensic examination during this audit period. Lastly, when asked how the agency ensures that the advocate meets the qualifications described above, the USPPM stated that the service is not coming from an official rape crisis center and the OVR has been trained in victim advocacy. The Auditor interviewed two inmates that reported sexual abuse. However, in both instances the allegations did not rise to the level of requiring a forensic medical examination.

The evidence collected for this provision shows that the facility has demonstrated that they do allow victim advocates to accompany and support alleged victims of sexual assault during the forensic examination and during the investigatory interview. Therefore, through written policy, and interviews conducted, the facility has demonstrated that it meets this provision.

115.21 Provision (f)

The TBCJ Inspector General Policy indicates that the policy of the Texas Board of Criminal Justice (TBCJ) inspector general ensures effective communication with the TBCJ and Texas Department of Criminal Justice (TDCJ) executive management. The Office of the Inspector General (OIG) is the primary investigative and law enforcement entity of the TBCJ.

The evidence collected for this provision shows that the Texas Board of Criminal Justice, Office of Inspector General conducts all criminal investigations for the TDCJ and follow the PREA standards required under this standard. Therefore, through written policy, and interviews conducted, the facility has demonstrated that it meets this provision.

Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring the agency to provide evidence protocols and forensic medical evaluations.

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none">a) TDCJ Safe Prisons PREA Plan

- b) TDCJ Safe Prisons PREA Operations Manual 05.01
- c) TDCJ Administrative Directive AD-16.20
- d) TDCJ Administrative Directive AD-02.15 (Operations of the Emergency Action Center)

Interviews:

- 1) Interview with Agency Head
- 2) Interview with Investigative Staff

Observations made during the On-site Phase of the Audit.

115.22 Provision (a)

TDCJ Safe Prisons PREA Plan states in part that; "An administrative and criminal investigation, as appropriate, shall be completed for all allegations of sexual abuse and sexual harassment."

In the past twelve months, the Stevenson Unit reported that they had received 9 allegations of sexual abuse or sexual harassment. The facility has reported that all 9 cases resulted in administrative investigations and 3 cases were turned over to the OIG for criminal investigation. While on-site, the Auditor reviewed all 9 administrative investigations.

When interviewing the Agency Head, he stated that, "Yes, the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and harassment." The Agency Head explained that sexual abuse allegations can be investigated by the OIG investigators who can investigate criminal allegations and conduct administrative investigations regarding staff-on-inmate allegations. He also indicated that TDCJ supervisors can conduct sexual harassment investigations.

During the document review, the Auditor reviewed 9 case files that consisted of 3 allegations of sexual harassment and 6 allegations of sexual abuse. All cases were investigated by the USPPM or OIG investigators, respectively.

The evidence collected for this provision shows that the agency has procedures in place to ensure that an administrative or criminal investigation is completed on all allegations of sexual abuse and sexual harassment. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.22 Provision (b)

TDCJ Safe Prisons PREA Plan states in part that; "Allegations of sexual abuse and sexual harassment shall be referred to the OIG for investigation. These referrals shall be documented on the appropriate investigative forms contained within AD-02.15, "Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents," for staff-on-offender allegations and the SPPOM for offender-on-

offender allegations.”

TDCJ policy requires that the Emergency Action Center (EAC) be responsible for receiving all reports of serious or unusual incidents, notifying the appropriate entities and administrative staff, and maintaining custody of all records relating to serious or unusual incidents.

During the on-site audit phase, the Auditor interviewed an OIG Investigator with the TBCJ Office of the Inspector General that is assigned to conduct investigations at TDCJ facilities. The Investigator was asked if agency policy requires that allegations of sexual abuse be referred for investigation to an agency with the legal authority to conduct criminal investigations unless the allegation does not involve potential criminal activity. The Investigator stated, “Yes, the agency has policy that directs all criminal investigations be conducted by the TBCJ OIG Unit.” In addition, while on-site, the Auditor conducted an interview with a facility investigator. When this same question was posed to the facility investigator, she indicated that she would conduct an initial inquiry and if she believed probable cause existed that a crime had been committed then she would contact the EAC and ask for an OIG Investigator to respond. The facility investigator also stated that OIG has the legal authority to conduct criminal investigations.

The evidence collected for this provision shows that the facility has procedures 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. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

Provision (c)

The TBCJ administrative directive designates the OIG as the principal law enforcement agency for the TDCJ. The OIG has primary jurisdiction for investigating criminal offenses occurring on TDCJ property or affecting TDCJ property, including criminal offenses. The OIG is primarily responsible for interactions between the TDCJ and outside law enforcement agencies. The TDCJ supervisors are responsible for conducting administrative investigations involving their staff members who violate the general rules of conduct. However, OIG Investigators may assist in these matters.

The Offender Orientation Handbook that can be found in its entirety on the agency website states in part that; “An offender protection investigation shall be conducted following report of the incident by a correctional officer or staff if the assault was perpetrated by another offender. Additionally, the Office of the Inspector General may investigate the incident for criminal violations. The Office of the Inspector General is generally responsible for conducting investigations regarding staff members who are ranked as a supervisor.” Finally, the agency website <http://www.tdcj.texas.gov/tbcj/prea.html> has a message that reads, “Family and friends of inmates, and the general public, are encouraged to report allegations of sexual abuse and sexual harassment that occur in TDCJ correctional facilities to the PREA Ombudsman Office or the TDCJ Ombudsman Office. Public inquiries regarding allegations of sexual abuse or sexual harassment are referred to the PREA Ombudsman Office for investigation and

response. All allegations of sexual abuse or sexual harassment received in the PREA Ombudsman Office are referred to the Office of the Inspector General for possible criminal investigation.”

The evidence collected for this provision shows that the facility has procedures in place that if a separate entity is responsible for conducting criminal investigations, such publications will describe the responsibilities of both the agency and the investigating entity. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

Provision (d)

In accordance with Texas Government Code § 493.019, the Office of the Inspector General (OIG) is the primary investigative and law enforcement entity of the TBCJ. The OIG reports directly and only to the Texas Board of Criminal Justice.

The evidence collected for this provision shows that the agency has procedures in place that the State OIG is responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons and there is a policy in place governing the conduct of such investigations. Therefore, through written policy the facility has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring the agency to ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none">a) TDCJ Safe Prisons PREA Planb) TDCJ Executive Directive PD-97 (Training & Staff Development)c) Safe Prisons/PREA Program Lesson Pland) Safe Prisons/PREA Video Scripte) TDCJ Security Memorandum SM-02.25 (On-The-Job Training Program)

- f) Safe Prisons PREA Training (Gender Specificity Training Curriculum)
- g) TDCJ Safe Prisons/PREA Operations Manual (Unit Safe prisons/PREA Program Awareness Training)
- h) Copies of Staff TDCJ Training Records
- i) TDCJ Safe Prisons/PREA Training Employee Acknowledgement Forms

Interviews:

- 1) Interview with Random Staff

Observations made during the On-Site Audit and Document Review

115.31 Provision (a)

The Stevenson Unit provides PREA refresher training to all of their employees on an annual basis. The facility also trains contractors and volunteers during their initial orientation process and then annually. New hires are trained while in basic training and then on an annual basis. The Stevenson Unit has provided the Safe Prisons/PREA Program lesson plan along with the video script. They have provided PREA In-Service PREA Training records along with signed PREA training acknowledgement forms. TDCJ Safe Prisons/PREA Plan states in part that; "All Safe Prisons/PREA Program training and education shall be performed in accordance with the Correctional Training and Staff Development program schedule, the SPPOM, and this plan. All employees who may have contact with offenders shall receive the following information in accordance with Safe Prisons/PREA requirements:

- a. The TDCJ's zero tolerance policy on sexual abuse and sexual harassment.
- b. Methods for fulfilling responsibilities under the TDCJ sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.
- c. The right of offenders to be free from sexual abuse and sexual harassment.
- d. The right of offenders and staff to be free from retaliation for reporting sexual abuse and sexual harassment.
- e. The characteristics of sexual abuse and sexual harassment in confinement.
- f. The common reactions of sexual abuse and sexual harassment victims.
- g. How to detect and respond to signs of threatened and actual sexual abuse.
- h. How to avoid inappropriate relationships with offenders.
- i. How to communicate effectively and professionally with offenders, including LGBTI, or gender nonconforming offenders.
- j. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; and the common characteristics of victims and predators,

sometimes referred to as red flags.”

Also the Training and Staff Development policy directs all unit assigned employees to receive SAFE Prisons/PREA Training, in accordance with federal PREA Standards 115.31, through required training and viewing the Safe Prisons/PREA training video.

During the interview process, 12 random staff were asked if they had received PREA training, and if so, when? All 12 officers indicated that they have received PREA training. Annual in-service training was mentioned 10 times; when they were first hired and attending the academy was mentioned 2 times; turn-out was mentioned 3 times and during monthly training was mentioned 4 times. When the Auditor reviewed staff files, it contained the dates of the initial training and proceeding PREA refresher training.

The evidence collected for this provision shows that the agency has procedures in place to train all employees on all relevant topics outlined in this standard provision. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.31 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; “The training shall be tailored to the gender of the offenders at the unit of assignment. The employee shall receive additional training when transferring to a unit with offenders of a different gender.”

The facility reported that during Pre-Service all trainees are trained to conduct visual and pat searches on male, female, and transgender inmates. If an employee transfers to a unit of a different gender, they will be retrained by the Field Training Officer (FTO) at that unit using the On-the-Job Training (OJT) manual as a refresher to the initial training.

The evidence collected for this provision shows that the agency has trained all employees in all aspects of PREA regarding the specific gender facility. Therefore, there is no need to provide additional training when transferred to a facility that holds only one specific gender. Through written policy the facility has demonstrated that it meets this provision.

115.31 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; “All employees who have contact with offenders, including medical and mental health care practitioners, shall receive training as outlined in Section VI.B.1, at least every two years. In the interim years, employees shall be provided refresher information on current sexual abuse and sexual harassment policies.” In addition, TDCJ Safe Prisons/PREA Manual requires that the USPPM ensure all unit staff are knowledgeable of the agency zero-tolerance policy regarding sexual abuse, voyeurism, and sexual harassment, as well as methods for the prevention, detection, reporting, and response to allegations of sexual abuse. In addition, the USPPM will provide awareness education to the unit staff and answer any questions or concerns regarding the operational procedures of the Safe Prisons/

PREA Program.

The Stevenson Unit provides PREA training on a yearly basis. All new employees receive initial training when attending the new-hire orientation and basic training. All new contractors and volunteers receive their initial training during the orientation process as well and then annually. This practice was confirmed by sampling employee training records. The files indicated that all 12 random staff employees received initial PREA training and had received refresher training. Finally, the Stevenson Unit provided several PREA training histories rosters and basic training records documenting the completion of the agency's annual PREA refresher training.

The evidence collected for this provision shows that the agency has provided initial and refresher PREA training to all their employees at least once a year. Therefore, through written policy and file review observations, the facility has demonstrated that it meets this provision.

115.31 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; "All training shall be documented, through employee signature or electronic verification, confirming that employees understand the training and information they have received."

The Stevenson Unit maintains training documentation that includes certificates of completion, electronic training records, and Safe Prisons/PREA Training Acknowledge forms. These documents show either electronic verification or staff signatures from volunteers, contractors, and sworn staff verifying they understand the PREA training and materials they have received.

The Stevenson Unit provided examples of employee training records or a hard copy with handwritten signatures generated from the Acknowledgement forms. This form makes the student/officer electronically acknowledge the training that was received and that requires the employee to sign acknowledging that they understand the training that was provided.

The evidence collected for this provision shows that the facility has provided documentation through employee signature, acknowledging that the employee understands the training received. Therefore, through written policy and file review observations, the facility has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring the agency to train all employees who have contact with inmates on its zero-tolerance policy for sexual abuse and/or harassment. Also, how to fulfill their responsibilities for preventing, detecting, reporting, and responding to sexual abuse. The inmates and employees' rights to be free from retaliation, inmates right to be free from sexual abuse, the dynamics of sexual abuse in confinement, common reactions of sexual abuse victims, how to communicate effectively with inmates, including LGBTQ inmates, and how to comply with relevant laws related to mandatory reporting of

	sexual abuse.
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Executive Directive PD-97 (Training & Staff Development) c) Windham Training Curriculum Safe Prisons/PREA d) TDCJ Handbook for Volunteers e) Volunteer Training Facilitators Guide f) TDCJ Acknowledgement of Volunteer Training/Orientation g) TDCJ Safe Prisons/PREA Training Contract Employees Acknowledge forms <p>Interview:</p> <ul style="list-style-type: none"> 1. Interview with Volunteers 2. Interview with Contractors <p>115.32 Provision (a)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “All volunteers and contractors who have contact with offenders shall be trained regarding sexual abuse and sexual harassment prevention, detection, and response policies and procedures in accordance with the TDCJ Volunteer Services Plan, PD-29, (Sexual Misconduct with Offenders), and this plan.” The TDCJ policy requires that all unit assigned contract employees report to the USPPM at their unit of assignment to receive Safe Prisons/PREA Training, in accordance with federal PREA Standard 115.32, by viewing the Safe Prisons/PREA in Texas video and completing the Safe Prisons/PREA Training Contract Employee Acknowledgement form after viewing the video.</p> <p>All volunteers and contractors who have contact with inmates will be trained in the TDCJ’s responsibilities under the departments PREA policy. The level and type of training provided to the volunteers and contractors is based on the services they provide and the level of contact they have with inmates, but all volunteers and</p>

contractors who have contact with inmates are notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents. Stevenson Unit maintains documentation showing volunteers, contractors, and TDCJ employees' signatures verifying that they understand the training and materials that they have received.

Volunteers and Contractors are trained during their initial orientation and are required to acknowledge that they have received the necessary PREA training by signing a Contractor/Volunteer PREA Acknowledgement form. The facility maintains all copies of signed volunteer and contractor acknowledgement forms and the facility provided examples of those forms as evidence of their compliance. At Stevenson Unit their medical staff are contracted, and they also contract with Windham that provides educational services for the inmates.

During the interviews with a Windham staff member and a volunteer, the Auditor asked if they had been trained in their responsibilities regarding sexual abuse and sexual harassment prevention, detection, and response. The Windham employee explained that she receives annual PREA training from the facility and the volunteer indicated that he received his PREA training on-line this year.

While performing the document review and the PAQ review the Auditor observed multiple signed volunteer/contractor PREA Acknowledgement forms.

The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors that have contact with inmates are trained on the prevention, detection, and response policies regarding sexual abuse and sexual harassment. Therefore, through written policy, personal observations, and interviews conducted, the agency has demonstrated that it meets this provision.

115.32 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "The level and type of training provided to volunteers and contractors shall be specific to the services provided and the level of contact with offenders; however, all volunteers and contractors who have contact with offenders shall be notified of the TDCJ's zero-tolerance policy regarding sexual abuse and sexual harassment and informed of the procedures for reporting incidents."

The facility currently reports 157 contractors and volunteers receiving 100% participation in training. Volunteers and contractors are trained during their initial orientation and are required to acknowledge that they have received the necessary PREA training by signing a Volunteer/Contract Employee Safe Prisons/PREA Acknowledgement form. The facility maintains all copies of signed Volunteer and Contractor Acknowledgement forms.

When interviewing the volunteer, he stated that training consists of the PREA zero-tolerance policy, and how to report if you are told. Also, if he was confronted with an allegation, how he would report it to an officer. When the Windham employee was asked the same question, their response was that they received the PREA training

	<p>regarding first responder duties, how to recognize warning signs or red flags', separate the individuals, prevent the destruction of evidence, notify medical, notify a supervisor, and document the incident. The Safe Prisons/PREA training curriculum provided in the PAQ contains information regarding the agency's zero-tolerance towards all sexual abuse and the PREA volunteer and contractor acknowledgement form confirms receipt of that information.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors are notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.</p> <p>115.32 Provision (c)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; "Training documentation confirming the volunteers and contractors have received and understand the training shall be maintained in accordance with the TDCJ Records Retention Schedule."</p> <p>The volunteer and contract employee acknowledgement forms are maintained by the USPPM and observed during the document review phase of this audit. In addition, the facility provided several examples of signed Safe Prisons/PREA acknowledgment forms in the PAQ.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure all volunteers or contractors documentation confirming that they received PREA training and understood that training. Therefore, through written policy and personal observations, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring PREA training for both volunteers and contractors.</p>
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115.33	Inmate education
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <p>a) TDCJ Safe Prisons/PREA Plan</p>

- b) Offender Orientation Handbook in English & Spanish
- c) TDCJ Unit Classification Procedure 5.00 (Orientation Procedures)
- d) TDCJ Unit Safe Prisons PREA Information in English & Spanish
- e) UTMB/CMC Nursing Service Policy Manual (Interpreter Services)
- f) TDCJ Security Memorandum SM-05.50 (Qualified Spanish Interpreter Guidelines)
- g) Correctional Managed Health Care Policy Manual (Certified American Sign Language (ASL) Interpreter Services)
- h) Safe Prisons/PREA Offender Sexual Awareness Education Rosters
- i) PREA Handbook in Braille

Interview:

- 1) Interview with Intake Staff
- 2) Interview with Random Inmates

115.33 Provision (a)

All TDCJ inmates arriving at the state correctional system are initially sent to an Intake Facility. Here the inmates are classified, medically evaluated, and provided with all the necessary education and information needed during their stay. It is at these Intake Facilities that the TDCJ inmates initially receive the PREA information along with the more comprehensive PREA education. At Stevenson Unit, they receive inmates from the TDCJ. Therefore, the Auditor was informed that during the audit rating period, when the new intake inmates arrive at Stevenson Unit, they are given the PREA information and must watch a comprehensive PREA video. Once completed, the inmates sign the Safe Prisons/PREA Offender Sexual Awareness Education Rosters. The facility provided both the initial PREA information and comprehensive educational training at initial intake to the facility as required by the standard and agency policy.

TDCJ Safe Prisons/PREA Plan states in part that; "During the intake process, offenders shall be provided with educational information explaining the TDCJ's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment in accordance with the TDCJ Classification Plan and TDCJ Unit Classification Procedures Manual. Within 30 days of intake, the USPPM shall ensure offenders are provided with comprehensive education either in person or through video regarding their rights to be free from sexual abuse and sexual harassment, and any retaliation for reporting these incidents; and regarding TDCJ policies and procedures from responding to these incidents in accordance with the SPPOM. Offenders shall receive information as described in Section VI.A.1, if transferred to a different facility, to the extent that the policies and procedures of the new facility differ from those of the previous facility, or if there is no

documented record the offender received the information.”

The Stevenson Unit identified that there were 777 inmates admitted into their facility in the last twelve months. Of those 777 inmates, the facility reported that all received the initial PREA information during the intake process along with comprehensive PREA educational information from the USPPM within 7 days of transferring to the Stevenson Unit.

During the interview with the Intake Officer, the officer explained that part of her responsibility as an intake officer is to provide all arriving inmates with the zero-tolerance policy and how to report sexual abuse, the orientation packet, and have the inmates watch the PREA video. She stated the inmates sign an attendance roster and initial receiving the PREA information. Finally, the officer indicated that there are posters mounted on the walls throughout the facility that explain these same instructions. When the Auditor interviewed 20 random inmates and 21 targeted inmates, they were asked if they had received information about the facility’s rules against sexual abuse and harassment. 40 inmates affirmed and acknowledged that they had received PREA educational information. One inmate explained that he was not sure. Of those 41 inmates interviewed, 40 inmates specifically indicated that they had received the training in the form of a video, that it was in-person (verbal orientation), and that they received a written packet. All indicated that they were given that information within 1 to 2 days of arriving at the facility.

The evidence collected for this provision shows that the facility has procedures in place to ensure that inmates receive information explaining how to report sexual abuse and the agency’s policy on zero-tolerance for sexual abuse or harassment at the time of intake. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.33 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; “Within 30 days of intake, the USPPM shall ensure offenders are provided with comprehensive education either in person or through video regarding their rights to be free from sexual abuse and sexual harassment, and any retaliation for reporting these incidents; and regarding TDCJ policies and procedures from responding to these incidents in accordance with the SPPOM.”

The Stevenson Unit identified 1088 inmates whose length of stay in the facility was over 30 days or more in the last twelve months. Of those 1088 inmates, the facility reports that all have received comprehensive PREA education regarding sexual abuse or harassment.

The Auditor interviewed an Intake Officer who stated that PREA information is provided to inmates during their initial intake process at Garza West. The officer also stated that the inmates must receive a PREA orientation when they first arrive at Stevenson Unit. When asked how long from the date of arrival inmates are made aware of these rights, the officer stated this usually happens within the first two days of arrival to the unit.

The Auditor also interviewed 41 inmates. Those inmates were asked if they were told about their right to not be sexually abused, how to report a sexual abuse, the right not to be punished for reporting a sexual abuse, and how long before they were made aware of these policies? 40 of the 41 inmates confirmed receiving the PREA information within twenty-four hours or immediately after arriving at the facility.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates receive a comprehensive education regarding their right to be free from sexual abuse, sexual harassment, and all forms of retaliation. Therefore, through written policy, and interviews conducted, the facility has demonstrated that it meets this provision.

115.33 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders shall receive information as described in Section VI.A.1, if transferred to a different facility, to the extent that the policies and procedures of the new facility differ from those of the previous facility, or if there is no documented record the offender received the information."

When the Intake Officer was asked how they ensure that current inmates, along with those transferred from another facility, have been educated on agency's zero-tolerance policy and sexual abuse? The officer explained that part of her responsibility as an intake officer is to provide all arriving inmates with the zero-tolerance policy and how to report sexual abuse, the orientation packet, and watch the PREA video. She stated the inmates sign and initial an attendance roster after receiving the PREA information. Finally, the officer indicated that there are posters mounted on the walls throughout the facility that explain these same instructions.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates who have not received PREA education shall be educated within 1 year of the effective date. Also, that inmates receive PREA education upon transfer to another facility. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.33 Provision (d):

The Stevenson Unit provided examples of different inmate PREA educational materials in formats that would be accessible to all inmates in accordance with Title VII of the Americans with Disabilities Act, 42 U.S.C. These formats include but are not limited to: Interpreters for the deaf, reading material to the visually impaired, video in both English and Spanish with subtitles, and providing Interpreters services for non-English speaking inmates.

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders shall be provided education in formats accessible to all offenders, including those who are limited English proficient, deaf, hard of hearing, blind, visually impaired, or otherwise disabled, as well as to offenders who have limited reading skills."

The Stevenson Unit utilizes the TDCJ contracted medical services with Correctional

Managed Health Care to provide ADA services such as American Sign Language, physical or intellectual disabilities, and Language Line Solutions for interpreter services. The facility also provide the policy that governs Staff Qualified Spanish Interpreters along with a list of certified Stevenson Unit staff. In addition, there are subtitles that are shown during the PREA educational video to ensure all inmates receive the information. The video is also audio for those who are visually impaired or those who may have limited reading skills. The Stevenson Unit also provided documentation of versions of their PREA information and posters in Spanish.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the facility provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, and limited reading skills. Therefore, through written policy and personal observations, the facility has demonstrated that it meets this provision.

115.33 Provision (e)

TDCJ Safe Prisons/PREA Plan states in part that; “The USPPM shall maintain documentation of completion rosters in accordance with the TDCJ Records Retention Schedule and record the information in accordance with the TDCJ Individualized Treatment Plan Procedures Manual.”

The facility utilizes a Safe Prisons/PREA Offender Sexual Awareness Education Rosters that are signed and initialed by the inmate acknowledging that they had received the PREA orientation, and the paperwork associated with that information. These rosters are maintained by the USPPM. This information was verified by the Auditor while reviewing inmate files during the document review phase of this audit. In addition, the facility provided numerous signed Safe Prisons/PREA Offender Sexual Awareness Education Rosters in the PAQ.

During the file review process, the Auditor reviewed 38 inmate files and identified that four inmates were missing the documentation needed to show compliance with providing the necessary PREA information and comprehensive PREA education in accordance with TDCJ agency policy. The facility immediately addressed those concerns, corrected the necessary training, and provided the Auditor documentation prior to the conclusion of the on-site visit. The Auditor is satisfied with the action taken.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the agency maintains documentation of inmate participation in PREA education sessions. Therefore, through written policy and personal observations, the facility has demonstrated that it meets this provision.

115.33 Provision (f)

TDCJ Safe Prisons/PREA Plan states in part that; “Educational posters and brochures regarding sexual abuse and sexual harassment prevention and reporting shall be displayed and made available to offenders in accordance with the SPPOM.”

	<p>The Stevenson Unit has posters strategically posted throughout the facility, in every housing unit, and departments i.e. (kitchen, educational and vocational classrooms) to ensure compliance with PREA standards. The Auditor personally observed these posters during the facility site review. All inmates are also issued a Stevenson Unit Inmate Handbook which has all PREA related information documented inside. This Handbook is also available on the inmate tablets for review.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that information will be continuously and readily available or visible to inmates. Therefore, through written policy and personal observations, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring PREA inmate education.</p>
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115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) Conducting a Thorough Investigation Training c) TDCJ Employee Training History <p>Interview:</p> <ul style="list-style-type: none"> 1) Interview with Investigative staff <p>115.34 Provision (a)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “Sergeants and above, including Security Threat Group correctional officers and Safe Prisons/PREA officers, shall receive training on conducting sexual abuse investigations in confinement settings. Training shall include:</p> <ul style="list-style-type: none"> a. Techniques for interviewing sexual abuse victims. b. Sexual abuse evidence collection and handling; and

c. Criteria and evidence required to substantiate an investigation.”

All sexual abuse and sexual harassment investigators who conduct non-criminal investigations at the Stevenson Unit have received specialized training. This specialized training was through the Texas Board of Criminal Justice, Safe Prisons PREA Program and presented by the PREA Ombudsman Office. The class title is “Conducting a Thorough Investigation.” In addition, The Stevenson Unit identified 17 facility investigators. They provided electronic copies of the officers TDCJ training history that show the course completion for all facility investigators.

When interviewing the Investigative staff, the special agent stated that he had received the PREA investigative training and has also attended additional Investigator classes at the Texas State Police Academy. The OIG Investigator stated that the PREA classes dealt with the proper use of Garrity and Miranda in criminal cases, evidence collection, and interview techniques. The Auditor also interviewed the facility investigator. She explained that she received the training in Huntsville, Texas and that the training focused on notifying the OIG and EAC when appropriate for reporting purposes.

The evidence collected for this provision shows that the agency has procedures in place to ensure that agency investigators receive specialized training in the art of investigating sexual abuse in a confinement setting. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.34 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; “Sergeants and above, including Security Threat Group correctional officers and Safe Prisons/PREA officers, shall receive training on conducting sexual abuse investigations in confinement settings. Training shall include:

- a. Techniques for interviewing sexual abuse victims.
- b. Sexual abuse evidence collection and handling; and
- c. Criteria and evidence required to substantiate an investigation.”

The Auditor reviewed the required training by the TBCJ and located all the above listed topics and discussion points. The Auditor also located a section specifically addressing the use of Miranda and Garrity rights as required by this standard, but not mentioned in policy. All sexual abuse and sexual harassment investigators who conduct non-criminal investigations at the Stevenson Unit have received specialized training.

When interviewing the Investigative staff, the special agent and facility investigator confirmed receiving training in the art of interviewing sexual abuse victims, proper use of Miranda and Garrity, sexual abuse evidence collection in a confinement setting, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

	<p>The evidence collected for this provision shows that the agency has procedures in place to ensure that agency investigators receive specialized training in the art of investigating sexual abuse in a confinement setting. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.</p> <p>Recommendation: The Auditor is recommending that the TDCJ add language to the Safe Prisons/PREA Plan policy that addresses the need to train on the proper use of Miranda and Garrity warnings as specifically outlined in provision (b) of this standard.</p> <p>115.34 Provision (c)</p> <p>TDCJ Safe Prisons PREA Plan states in part that; “Records documenting the staff investigators have completed the required sexual abuse investigations training shall be maintained in accordance with the TDCJ Records Retention Schedule.”</p> <p>The Stevenson Unit has provided copies of specialized training records for all staff trained in investigating sexual abuse in a confinement setting in the form of an electronic copy of TDCJ Employee Training Histories.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that all staff responsible for investigating sexual abuse have received additional specialized training and maintains the documentation necessary to prove that training. Therefore, through written policy and personal observation by documents provided, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring specialized training for investigators who perform sexual abuse and sexual harassment investigations.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons PREA Plan b) Correctional Medical Health Care Policy C-19.1 (Continuing Education) c) The University of Texas Medical Branch (UTMB) PREA Specialized Training

d) Electronic Course Report: Safe Prisons PREA Specialized Training Medical/Mental Health

Interview:

1) Interview with Medical & Mental Health Staff

Observations made during the on-site audit and document review.

115.35 Provision (a)

TDCJ Safe Prisons PREA Plan states in part that; "All full and part-time medical and mental health care practitioners who work regularly in TDCJ operated facilities shall be trained in:

- a. How to detect and assess signs of sexual abuse and sexual harassment.
- b. How to preserve physical evidence of sexual abuse.
- c. How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and
- d. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment."

The facility reported that there are 13 medical health staff professionals employed by the University of Texas Medical Branch (UTMB) and contracted by the Correctional Medical Health Care (CMHC) who work regularly with inmates and have received the specialized training as required by the agency's policy. During the pre-audit phase, the Auditor was provided with an electronic course report (Safe Prisons PREA Specialized Training Medical/Mental Health) training showing that medical staff and mental health staff had completed the specialized course.

When interviewing the medical and mental health staff, they informed the Auditor that they had previously received initial training when they first started work and receive annual PREA refresher training. They also received additional training on the above-listed topics by going online and taking PREA online classes through the University of Texas Medical Branch.

The evidence collected for this provision shows that the agency has procedures in place to ensure that medical and mental health personnel receive additional training as outlined in this standard. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.35 Provision (b)

TDCJ Safe Prisons PREA Plan states in part that; "All medical staff employed or under contract with the TDCJ who conduct forensic examinations shall be appropriately trained."

The Regional Hospitals employ Sexual Assault Nurse Examiners (SANE) that performs

forensic medical exams for this facility. Medical staff at this facility do not conduct forensic medical examinations. This practice was confirmed during the interview conducted with the Facility Health Service Administrator and mental health staff who stated that they do not perform forensic medical examinations. Therefore, this standard is not applicable to the Stevenson Unit.

The evidence collected for this provision shows that the agency does not perform forensic medical examinations. Therefore, this provision is not applicable to the Stevenson Unit.

115.35 Provision (c)

TDCJ Safe Prisons PREA Plan states in part that; "Documentation verifying that medical and mental health practitioners have received all necessary training referenced in this plan, either from the TDCJ or from outside sources, shall be maintained by the TDCJ."

The facility provided a copy of an electronic print-out confirming the completion of the required UTMB specialized PREA training for all thirteen medical and mental health professionals.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all medical and mental health staff have received additional specialized training. Therefore, through written policy and documents provided, the facility has demonstrated that it meets this provision.

115.35 Provision (d)

TDCJ Safe Prisons PREA Plan states in part that; "All employees who have contact with offenders, including medical and mental health care practitioners, shall receive training as outlined in Section VI.B.1, at least every two years. In the interim years, employees shall be provided refresher information on current sexual abuse and sexual harassment policies."

During the pre-audit phase, the agency provided copies of training logs indicating that medical staff receive the same in-service annual PREA training that security staff receives. In addition, while interviewing medical and mental health staff, the Auditor was told that they receive PREA training on an annual basis.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all medical staff receive(s) the same PREA training that volunteers, contractors, and security staff receive. In addition, they receive this training on an annual basis. Therefore, through written policy and documents provided, the facility has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring specialized training for Medical and Mental health care.

115.41**Screening for risk of victimization and abusiveness**

Auditor Overall Determination: Meets Standard

Auditor Discussion

The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:

Documents:

- a) TDCJ Safe Prisons/PREA Plan
- b) Safe Prisons/PREA Automated Network System (SPPANS) Assessment Guide
- c) Safe Prisons/PREA Operations Manual (SPPOM) 03.01
- d) SPPOM Offender Assessment Screening

Interviews:

- 1) Interview with Staff performing Risk Screening
- 2) Interview with Random Inmates
- 3) Interview with PREA Coordinator
- 4) Interview with PREA Compliance Manager (USPPM)

Observations made during the on-site audit and document review.

115.41 Provision (a)

TDCJ Safe Prisons/PREA Plan states in part that; "All offenders shall be assessed during intake, and if transferred to another unit for permanent assignment, to determine the risk of being sexually abused by or sexually abusive toward other offenders."

During the interview with the USPPM who performs risk screening, the Auditor went through the risk screening process. The Auditor asked if the USPPM screened inmates for risk of sexual victimization upon arrival or transfer from another facility. The USPPM stated that, "Yes, she does." Also, during the interviews with 41 inmates; 37 inmates recalled having been asked those specific questions listed below and 4 inmate stated he did not get asked those questions at this facility. The Auditor reviewed the risk assessment questionnaire called the SPPOM Offender Assessment Screening and identified that the screening form asks twenty-six PREA related questions such as the following:

- Have they been in jail before?
- Have they ever been sexually abused?

- Did they identify with being LGBT?
- Did they think they might be in danger of sexual abuse while incarcerated when they first came to prison?

The evidence collected for this provision shows that the agency has procedures in place to ensure all inmates receive a risk screening evaluation for the risk of being sexually abused while incarcerated. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.41 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "Intake screening shall take place within 24 hours of arrival at the unit in accordance with the SPPOM." The TDCJ SPPOM further addresses the need to assess all inmates during intake and upon transfer to another facility for the risk of being sexually abused by other inmates or sexually abusive toward other inmates. The policy requires all inmates to be assessed within 24 hours of their arrival at the facility.

The facility reported that they received 767 inmates into their facility in the last twelve months that had a length of stay of more than 72 hours. The facility reports that 100% of the inmates received a risk screening assessment for risk of being sexually abused during incarceration.

The facility provided samples of completed risk screening forms (SPPOM Offender Assessment Screening) during the pre-audit phase and downloaded those documents into the Pre-audit Questionnaire. In addition, during the document review, the Auditor observed completed PREA Risk Screening SPPOM Offender Assessment forms in the inmate record files.

When conducting the interview with staff responsible for performing risk-screening assessments, the USPPM stated that she usually conducts the risk screening process within 24 hours of the inmate being transferred to the facility. As stated in the previous provision, the Auditor interviewed 41 inmates, for which 37 inmates indicated that they had been questioned about sexual victimization within 72 hours of arriving at the facility. When conducting the inmate file review of 38 inmate files, the Auditor identified four files that were missing the necessary risk screening forms. The facility immediately addressed this issue and re-screened those inmates that were missing the documentation prior to the Auditor leaving the facility. The Auditor is satisfied with the corrective action taken to immediately rectify the problem. The Auditor sampled 41 inmate files which indicated that 38 inmates had a risk screening performed within the first 72 hours of arriving at the facility.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all inmates are screened for the risk of sexual abuse within 72 hours of arrival at the facility. Therefore, through written policy, personal observations, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.41 Provision (c)

The risk screening assessment consists of 26 overall 'yes or no' questions with 12 specifically addressing sexual victimization or aggression. In addition, the facility provided SPPANS Assessment Guide with the assessment instructions that describes if certain questions are answered 'yes' to, then that person could be either classified as a potential victim or aggressor. In addition, the instructions indicate that if an inmate answers 'yes' to a certain amount of sexual victimization questions then that inmate will be deemed a potential heightened risk of being sexually victimized. If the inmate answers 'yes' to a certain amount of sexual aggressive questions, then that inmate will be deemed a potential heightened risk of being sexually aggressive. The computer software calculates and determines the outcome by the questions asked. Therefore, there is no subjectivity to this assessment.

When interviewing the USPPM, she was asked what the initial risk screening considers and what is the process for conducting the risk screening? The USPPM indicated that the risk screening considers charges, sexual victimization, LGBTQ, how they identify, if they feel safe, gang affiliation, and an array of other topics. The USPPM also stated that the process takes place at a computer in a private setting.

Through observations, interviews, and policy the facility has demonstrated that it uses an objective risk assessment tool to identify potential inmates at risk of being sexually victimized or sexually aggressive. Therefore, the facility meets this provision.

115.41 Provision (d)

TDCJ Safe Prisons/PREA Plan states that, "Assignments shall be made through the collaborative efforts of intake staff, the USPPM, and medical and mental health services by using objective screening instruments. The intake screening shall include, at a minimum, the following criteria to assess offenders for risk of sexual victimization:

- (1) Any mental, physical, or developmental disability.
- (2) The age of the offender.
- (3) The physical build of the offender.
- (4) Previous incarceration.
- (5) Whether the criminal history is exclusively nonviolent.
- (6) Prior convictions for sex offenses against an adult or child.
- (7) Perception of the offender as gay, lesbian, bisexual, transgender, intersex, or gender nonconforming.
- (8) Previous sexual victimization; and
- (9) The offender's own perception of vulnerability."

The staff member responsible for performing risk-screening assessments (USPPM) was asked what the risk screening considered and what is the process for conducting these assessments. The USPPM stated the assessment asks questions, such as: has the inmate been sexually abused in the past, sexual violence, gender identity, and the age and stature of the inmate. Finally, the USPPM stated that the screening is conducted face to face and software in SPPANS assists in identifying potential inmate victims or aggressors. She also stated that mental health makes the determination related to if the inmate suffers from mental or developmental disability issues.

The TDCJ does not detained solely for civil immigration purposes and therefore not applicable.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the intake screening shall consider, at a minimum, the 10 criteria identified in this standard provision. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.41 Provision (e)

TDCJ Safe Prisons/PREA Plan indicates that, "The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the TDCJ, in assessing offenders for risk of being sexually abusive."

The risk screening form (SPPOM Offender Assessment) utilized by the USPPM does consider prior acts of sexual abuse, prior convictions for violent offenses, and a history of prior institutional sexual abuse. The staff member responsible for performing risk-screening assessments was asked what the risk screening considered and what is the process for conducting these assessments. The USPPM stated the assessment asks questions such as has the inmate had prior acts of sexual abuse in the past, prior convictions of sexual assault, and known to the agency as a prior sexual abuse aggressor.

The evidence collected for this provision shows that the agency has procedures in place to capture and ask the questions listed above surrounding potential aggressor behavior. Therefore, through document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.41 Provision (f)

TDCJ Safe Prisons/PREA Plan states in part that; "Within a period of time not to exceed 30 days from the offender's arrival at an intake facility, the offender shall be reassessed for risk of victimization or abusiveness following receipt of any additional or relevant information received by the TDCJ since the initial intake screening."

During the pre-audit, the facility reported 1088 inmates that entered the facility over the last twelve months and stayed more than 30 days. Out of those inmates, the agency reported all 1088 inmates were reassessed within 30 days after their arrival at the facility for risk of sexual victimization based upon any additional relevant

information received since intake over the last twelve months.

The staff member responsible for performing risk-screening assessments was asked how long after arrival are inmates risk levels reassessed. The USPPM stated that within 30 days from the initial arrival to the facility. When interviewing 41 inmates, they were asked if staff had ever asked PREA related questions again during their incarceration. 24 inmates stated that they had, 6 inmates stated that they had not, 10 inmates could not recall, and 1 inmate was not due for a reassessment. The facility conducts the reassessment and documents those interactions on the same SPPOM Offender Assessment form. The Auditor reviewed 38 inmate files and 34 files contained the reassessment documentation. As mentioned in the previous provision, four files were missing the appropriate documentation because the reassessment is documented on the same computer-generated form that evidence was missing. The facility immediately reassessed those individuals prior to the completion of the on-site visit.

The evidence collected for this provision shows that the agency has procedures in place to conduct a 30-day risk screening reassessments based upon additional or relevant information received by the facility. They also have a tool to attempt to extract additional sexual safety information. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.41 Provision (g)

TDCJ Safe Prisons/PREA Plan states in part that; "An offender's risk level shall be reassessed following a referral, request, incident of sexual abuse, or receipt of additional information that may affect the offender's risk of sexual victimization or abusiveness. An investigation shall be conducted upon referral, request, an incident of sexual abuse, or receipt of additional information that may affect the offender's risk of sexual victimization or abusiveness. The unit classification committee or warden shall review the investigation and any prior assessment screening to determine the offender's current risk level."

When interviewing the staff responsible for conducting risk screening the USPPM stated that they do reassess when warranted due to additional information received about the inmate's sexual safety.

The evidence collected for this provision shows that the agency has procedures in place to reassess an inmate's risk of sexual victimization due to a referral, request, or additional information. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.41 Provision (h)

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders shall not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to Section III.B.3."

When interviewing the staff responsible for conducting risk screening, the USPPM stated that the facility does not punish inmates if they chose not to answer the questions associated with the risk screening assessment.

The evidence collected for this provision shows that the agency has procedures in place to prevent inmates from being disciplined for refusing to answer or for not disclosing complete information in response to risk screening. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.41 (i)

TDCJ Safe Prisons/PREA Plan states in part that; “Staff shall use appropriate controls to disseminate responses to questions asked pursuant to this plan within the units, ensuring that sensitive information is not exploited to the detriment of any offender by staff or other offenders. Any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, assisting with making treatment plans and informed management decisions, including those related to housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local law.”

When interviewing the PREA Coordinator, she was asked who has access to the inmates’ risk screening information. The coordinator explained that the information is stored in the agency SPPANS network system which has restricted access and is only authorized on a need-to-know basis. The PREA Compliance Manager (USPPM) echoed those same remarks and reiterated that permissions are limited to Classification officers, Warden, and USPPM. The staff member responsible for conducting risk screening (USPPM) explained that only certain positions have access depending on their job description and permissions granted by the Safe Prisons/PREA Program.

The evidence collected for this provision shows that the agency has procedures in place to control access to the risk screening information collected by the facility and that the information is not exploited. Therefore, through document review and interviews conducted, the facility has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring screening for risk of victimization and abusiveness.

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

Evidence relied upon to make Compliance Determination:

1. Policy and Document Review
2. Pre-Audit Questionnaire
3. TDCJ Safe Prisons/PREA Plan
4. Inmate Correspondence Response
5. Specialty Staff Interview Notes

The Agency has a directive that instructs all Texas Department of Criminal Justice staff involved in making inmate unit/housing assignments with a comprehensive listing of housing assignment criteria and procedures. The TDCJ Classification Plan provides more specific guidance to staff. All inmate housing assignments, including assignment to a unit or to specific housing areas, such as dormitories, cellblocks, rows, or other similar areas, are made based on objective criteria and not based on race, color, nationality, or ethnic origin. The initial unit assignment is made at the central headquarters level. All classification committees, classification, security, and health care staff both at the central and unit levels follow these criteria and procedures. Some of the unit/housing assignments criteria include:

- Criminal history
- History of institutional sexual violence or victimization
- Current offense (type and seriousness), sentence length, and amount of time completed on sentence.
- Violent or passive tendencies
- Security Precaution Designator (SPD)
- Criminal sophistication
- Inmate enemies
- Lesbian, gay, and bisexual (both active and passive) tendencies
- Transgender and intersex identification
- Characteristics such as height, age, and weight
- Security threat group affiliation
- Current institutional adjustment, as reflected in the inmate's disciplinary record.
- Special safety requirements; and Predator codes.

Information pertaining to each inmate's security characteristics can be found in the inmate's electronic record. The documents contained in the inmate's electronic record

	<p>are accessible at both the unit and central administration levels. This was confirmed by reviewing multiple inmate records.</p> <p>When making initial housing assignments or housing assignment changes, the designated staff member or committee responsible for making such assignments reviews all pertinent information, such as the classification screen, electronic record, Safe Prisons/PREA Assessment, and other similar information, to determine whether there are any security or health-related needs or restrictions relative to the inmate's housing assignment.</p> <p>After careful and detailed review of all the information, the Auditor determined the Agency meets the requirements for this standard.</p> <p>The Texas Department of Criminal Justice performed an agency PREA audit that was finalized and received on November 21, 2024, in the form of a Final PREA Audit Report. In addition, the TDCJ completed a prior agency PREA audit in September 2023. In both cases, the agency was found to have been in compliance with Standard 115.42 by the PREA Auditor and a determination of "meets the standard" as the overall determination. This facility (Stevenson Unit) strictly follows the policies, procedures, and protocols established and instituted by the TDCJ.</p>
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115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Restrictive Housing Plan <p>Interviews:</p> <ul style="list-style-type: none"> 1) Interview with Warden 2) Interview with Staff who supervise inmates in segregated housing <p>Observations made during the on-site audit and document review.</p> <p>115.43 Provision (a)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; "Offenders at high risk for sexual victimization shall not be placed in protective safekeeping unless an assessment of all available alternatives has been made and it is determined there is no available</p>

alternative means of separation from likely abusers. If the assessment cannot be completed immediately, the unit may hold the offender in involuntary segregated housing while completing the assessment, for no longer than 24 hours.”

The Warden stated during his interview, that the agency does have a policy prohibiting placing inmates at high risk of sexual victimization in involuntary segregated housing in lieu of other housing areas. He also reported that his facility had no instances or had never experienced a situation where an inmate at high risk of sexual victimization was housed in involuntary segregation over the last twelve months.

The evidence collected for this provision shows that the agency has procedures in place to address not using segregated housing for those inmates at high risk of victimization unless no alternative means of separation is available. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.43 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; “Offenders placed in protective safekeeping for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the unit restricts access to programs, privileges, education, or work opportunities, the unit shall document:

- a. The opportunities that have been limited.
- b. The duration of the limitations; and
- c. The reasons for the limitations.”

The facility reported no instances where an inmate was placed in segregation based on the high probability of sexual victimization. During the facility tour, the Auditor visited the Restrictive Housing Unit. There was no evidence that suggested any inmate being housed in the RHU was there due to their risk for sexual victimization. The Auditor also reviewed the housing assignments to verify that no inmate was being housed involuntarily due to the risk of being sexually victimized.

During the interview with a staff member that supervises inmates in the RHU, he was asked if inmates that are housed in segregation due to their risk of sexual abuse would have the same privileges and access to all other programs as any other inmate. The officer indicated that they would have the exact same opportunities as all other general population inmates, but access would be initially be limited until the investigation was finalized. The Auditor did not interview an inmate housed in a segregated housing unit due to possible victimization because the facility reported no instances of such a situation and the Auditor found no evidence of this circumstance.

The evidence collected for this provision shows that the agency has procedures in place to ensure that if an inmate is placed in segregation due to the high risk of being sexually victimized that the inmate would retain all the privileges and opportunities that all other inmates are afforded. Therefore, through written policy, personal

observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.43 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders shall be assigned to protective safekeeping only until an alternative means of separation from likely abusers is arranged, for no longer than 30 days."

The facility reported no instances where an inmate was placed in segregation based on the high probability of sexual victimization.

The Warden was interviewed and stated that only if there were no alternatives, would an inmate be involuntarily segregated because of the possibility of being sexually victimized and would only be done for an "Inmate Protection Investigation, (IPI)." The Warden explained that at the most, an inmate would stay in Restrictive Housing for no more than 24 hours while the IPI was being conducted. The Officer assigned to the RSU stated that the inmate placed in RHU due to the risk of sexual victimization would only stay until alternative housing was arranged. He stated that a committee would speak with them within a week and when the investigation is completed.

The evidence collected for this provision shows that the agency has policies in place to ensure that if an inmate is placed in involuntary segregation, such assignment would not exceed 30 days. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.

115.43 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; "If a protective safekeeping housing assignment is made pursuant to Section III.C.3, the unit shall clearly document:

- a. The basis of the concern for the offender's safety; and
- b. The reason why no alternative means of separation can be arranged."

The Warden reported no instances where the facility had an inmate at high risk of victimization placed in restrictive housing until an alternative could be found and ordinarily this will not exceed 30 days. The Warden indicated that the facility will clearly document the basis for their concern for the inmate's safety and the reason why no alternative could be found if they experienced such an event. There was no such event that occurred during this audit period.

The Stevenson Unit has reported no instances of assigning any inmate to involuntary segregated housing for the purpose of separating that inmate due to the high risk for sexual victimization.

The evidence collected for this provision shows that the agency does have a written policy in place to address documenting the basis for the segregation and why no alternative means of separation could be arranged. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

	<p>115.43 Provision (e)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “Every 30 days, the unit shall conduct a review to determine if there is a continuing need for separation of the offender from the general population.”</p> <p>During the interview with the officer assigned to the RHU, he was asked once an inmate is assigned to involuntary segregation, does the facility review the inmate’s situation every 30 days to determine if the housing assignment is still appropriate. The officer stated that, “Yes, they do.” Also that administrators review the status of all inmates in the RHU once a week.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to reassess and review an inmate’s housing assignment every 30 days to see if there is a continued need for separation. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence the PREA Auditor has determined that the facility is fully compliant with this standard requiring limitations on protective custody.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Board Policy BP-03.91 (Uniform Inmate Correspondence Rules) c) Offender Orientation Handbook in English & Spanish d) TDCJ Board Policy BP-02.09 (PREA Ombudsman Policy Statement) e) TDCJ Board Policy BP-01.01 (Texas Board of Criminal Justice Responsibilities) f) TDCJ PREA Coordinator Statement of Fact (dated 10/26/2023) g) TBCJ PREA Brochure h) PREA Posters in both English and Spanish

i) PREA Zero Tolerance Ombudsman Poster in English, Spanish, and Hearing Impaired

Interviews:

- 1) Interviews with Random Staff
- 2) Interviews with various inmates
- 3) Interview with PREA Compliance Manager (USPPM)

Observations made during the on-site audit and document review.

115.51 Provision (a)

The facility has provided multiple ways to report a sexual abuse or sexual harassment allegations in a private setting. These reporting options are listed in written policy, confirmed through interviews, and observed through posters and handouts. TDCJ Safe Prisons/PREA Plan specifically addresses three ways to report an allegation of sexual abuse or harassment. Those include making a report to the Major, Office of the Inspector General, or to the PREA Ombudsman. The inmates can also report verbally to any staff member or by submitting, in writing: a Facility Request (I-60) or Grievance Form. Also, having a 3rd party make a report for the alleged victim. The contact information and phone numbers for the PREA Ombudsman and the OIG are provided in the PREA Brochure. In addition, PREA posters are displayed throughout the facility both in English and in Spanish listing the ways an individual can report an allegation of sexual abuse. The staff training curricula consists of classroom instruction and an online training portal that provides staff ways to report.

During the on-site audit, the Auditor performed 12 random staff interviews and 41 inmate interviews. Of the 12 random staff that were interviewed: 1 staff member could identify four ways to report, 6 staff members could identify three ways to report, 3 staff members indicated two ways to report, and 2 staff members offered one way to report. Of the 41 inmates that were interviewed: 3 inmates could offer four ways to report sexual abuse, 11 inmates could offer three ways, 19 inmates identified two ways, and 8 inmates provided at least one way to report. Every inmate interviewed could name at least one way to report an allegation of sexual abuse.

During the on-site review, the Auditor observed and documented PREA posters posted in both housing units and in public areas throughout the facility. The Auditor contacted Just Detention International and confirmed that they had not received any sexual abuse allegations during this rating period. The Auditor test emailed the outside reporting entity (PREA Ombudsman) while conducting the on-site facility tour. The email was generated on 12/13/2024 at approximately 0730 hours. The PREA Ombudsman replied to the email confirming receipt on 12/13/2024 at 0731 hours. Finally, the Auditor had multiple conversations with inmates during the facility tour asking them if they knew how to report sexual abuse. Those inmates indicated by writing to the PREA Ombudsman, verbally to staff, and/or writing it on an I-60 or on the inmate tablet.

When reviewing the investigative files, the Auditor documented that allegations were made via grievance three times, verbally to staff four times, in writing once, and third-party reporting once.

The evidence collected shows that the facility has provided multiple ways to report sexual abuse or sexual harassment. The evidence also shows that many staff and inmates are aware of those reporting procedures by confirming the information is being provided. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.51 Provision (b)

The Facility has provided information regarding writing to the PREA Ombudsman anonymously if inmates choose to report allegations of sexual abuse. The mailing address is listed on the PREA posters, and a phone number is located on the PREA Brochure. This fact was confirmed through the on-site observation. During the facility site review, the Auditor sent an email to the outside agency as a test of the procedure. The Auditor wrote a message for the Ombudsman to respond back confirming the receipt of the Auditor's message. The PREA Ombudsman immediately responded back to the Auditor.

TDCJ BP policy 02.09 governs how the Texas Board of Criminal Justice (TBCJ) Prison Rape Elimination Act (PREA) Ombudsman will 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 policy directs the PREA Ombudsman to 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 to the TBCJ chairman, as deemed appropriate and necessary.

TDCJ BP-03.91 states that, "'Special Correspondence' is any mail sent to or from a special correspondent. This includes correspondence from a rape crisis center that possesses a Memorandum of Understanding (MOU) with the TDCJ to provide emotional support to inmates. 'Special Correspondent' is any member of the Texas Board of Criminal Justice; the executive director; the deputy executive director; any division directors, deputy directors, Prison Rape Elimination Act (PREA) ombudsman, or wardens of the TDCJ." The policy further indicates that, "Inmates may send sealed and uninspected letters directly to Special and Media Correspondents. All incoming correspondence from any Special or Media Correspondent shall be opened and inspected only for contraband, except under the special circumstances noted in these rules. The inspection shall be in the inmate's presence."

The TDCJ PREA Coordinator provided a "Statement of Fact" that states, "The Texas Department of Criminal Justice (TDCJ) does not detain individuals solely for civil immigration purposes, but TDCJ does make available foreign consulate general addresses for all foreign nationals."

When conducting interviews with 41 inmates, 36 inmates acknowledged being aware

that a sexual abuse allegation can be made anonymously, while 4 stated that they did not know they could report anonymously, and 1 inmate stated that you couldn't. When interviewing the USPPM, she was asked how the facility provides a way for an inmate to report a sexual abuse to a public or private entity that is not part of the agency. The USPPM confirmed the use of writing to the PREA Ombudsman as their method of providing an outside entity for reporting purposes. The USPPM also confirmed that the correspondence can remain anonymous, and that the information is immediately forwarded to the Warden. Finally, the Auditor interviewed a mail room staff member. She stated that the staff keeps a log of all special mail that is received. She indicated that the inmate is not required to place a return address with their name or inmate number on the envelope. The staff member stated that if the PREA Ombudsman writes back to the inmate, the inmate is called down to the mailroom and the mail is opened and inspected in front of the inmate, then given to them.

The evidence collected for this provision shows that the facility has provided at least one way for an inmate to report abuse or harassment to a public or private entity not affiliated with the agency. Lastly, the Stevenson Unit does not allow the detention of an inmate for the sole purpose of immigration status. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.51 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; "Staff shall accept reports made verbally, in writing, anonymously, and from third parties, and shall promptly document any verbal reports."

During staff interviews, the officers explained that their duties were to immediately write a report recording the verbal sexual allegation. When interviewing inmates, several explained that they would notify a supervisor or security officer. The officers also stated that the report would be immediate. When further questioned about the term "immediate" the officers stated no later than by the end of their shift. The USPPM was interviewed and asked to define what "immediately" meant according to the protocol. The USPPM explained that immediately is defined as at least before the end of the officer's tour of duty for that day. In addition, all the PREA posters displayed throughout the facility state that an allegation of sexual abuse can be reported verbally. When interviewing the inmates, 39 acknowledged being able to report verbally and/or in writing. During the investigative case file review, the Auditor documented four allegations being initiated verbally to staff and four in writing.

The evidence collected for this provision shows that the agency has demonstrated that they accept, and document sexual abuse reports verbally, in writing, and from third parties. It has also been determined that these reports have been handled in a timely fashion. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.51 Provision (d)

TDCJ Policy instructs employees or other staff to privately report alleged sexual

	<p>misconduct with an inmate directly to the PREA Ombudsman, Office of the Inspector General (OIG), or the OIG Records Management Office if staff choose not to report through their chain-of-command.</p> <p>Of the 12 random staff members interviewed, the PREA Ombudsman was mentioned seven times, the OIG was mentioned three times, and the Warden was mentioned twice.</p> <p>The evidence collected for this provision shows that the facility has demonstrated that they do provide staff with a private method of reporting sexual abuse or sexual harassment of inmates. Therefore, through written policy, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined that the facility is fully compliant with this standard requiring the agency provide multiple internal ways for inmates to privately report sexual abuse or sexual harassment.</p>
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115.52	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Administrative Directive AD-03.82 (Management of Inmate Grievances) c) TDCJ Statement of Fact authored by the Resolution Support Manager dated 07/02/2024 d) IGOM 1.04 PREA Allegations <p>Observations made during the on-site audit and document review.</p> <p>115.52 Provision (a)</p> <p>TDCJ policy indicates that Emergency Grievances will be reviewed by the UGI, at which time the determination will be made as to the category of the complaint. Grievances alleging sexual abuse will be managed by the unit warden, major, chief of classification, USPPM, OIG, medical, and the PREA Ombudsman as outlined in the TDCJ Safe Prisons/PREA Plan.</p>

115.52 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "A time limit shall not be imposed when an offender may submit a grievance regarding an allegation of sexual abuse. Time limits to any portion of a grievance that does not allege an incident of sexual abuse shall be managed in accordance with the TDCJ Offender Grievance Operations Manual. Offenders shall not be required to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse."

115.52 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; "In accordance with the TDCJ Offender Grievance Operations Manual, an offender who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and a grievance of this nature shall not be referred to a staff member who is the subject of the complaint."

115.52 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; "A final decision shall be made on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

a. Computation of the 90-day time period shall not include time used by offenders for preparing an administrative appeal. If the 90-day time period is insufficient to make an appropriate decision, an extension of up to 70 days may be granted. The offender shall be notified in writing of the extension and a date by which the decision will be made."

The Stevenson Unit has reported three instances of receiving an emergency grievance during this audit period alleging sexual abuse. In all three written grievances, an administrative investigation was initiated and completed.

115.52 Provision (e)

TDCJ Safe Prisons/PREA Plan states in part that; "Third parties, including fellow offenders, staff members, family members, attorneys, and advocates, shall be permitted to assist offenders in filing requests for administrative remedies relating to an allegation of sexual abuse, and shall also be permitted to file these requests on behalf of offenders. If a third party files a request on behalf of an offender, the unit may require, as a condition of processing the request, the alleged victim to 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 in accordance with the TDCJ Offender Grievance Operations Manual. If the offender declines to have the request processed on his or her behalf, the decision shall be documented in accordance with the TDCJ Offender Grievance Operations Manual."

115.52 Provision (f)

TDCJ Safe Prisons/PREA Plan states in part that; "An emergency grievance alleging

substantial risk of imminent sexual abuse shall be filed and managed in accordance with the TDCJ Offender Grievance Operations Manual. When an emergency grievance is received, any portion that alleges the substantial risk of imminent sexual abuse shall be forwarded to a level of review for immediate corrective action. An initial response shall be provided within 48 hours of receipt, and a final decision rendered within five calendar days. The initial response and final decision shall document whether the offender is at substantial risk of imminent sexual abuse and the action taken.”

115.52 Provision (g)

TDCJ Safe Prisons/PREA Plan states in part that; “An offender may be disciplined for filing a grievance related to alleged sexual abuse only when the investigation determines the offender filed the grievance in bad faith.”

The Stevenson Unit reported no instances where an inmate was disciplined for filing a grievance regarding a sexual abuse in bad faith.

Conclusion

The agency has a policy that places limitations on what allegations can be handled through the grievance process. The agency’s procedure is that grievances received about sexual assault and sexual harassment will be accepted and reviewed regardless of when the incident took place. The agency protocol is if the Warden or PREA Compliance Manager (USPPM) receives a grievance alleging sexual abuse or sexual harassment by staff or sexual abuse by an inmate, the grievance is immediately handled as a PREA complaint and investigated as such, to include assigning it to a PREA Investigator for further investigation. The grievance process is immediately stopped, and an administrative investigation is immediately initiated. Therefore, this standard is not applicable in the meaning and purpose for which it is intended. The grievance process is to serve as a vehicle to provide due process in certain situational incidents in a confinement setting and not the purpose of reporting or investigating a sexual abuse allegation in this facility. However, an inmate can use the “emergency grievance” process as a means of reporting sexual abuse allegations. The inmates can also use the grievance process to oppose the finding of a sexual abuse investigation as part of their due process and administrative remedies.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:

Documents:

- a) TDCJ Safe Prisons/PREA Plan
- b) Texas Association Against Sexual Assault (TAASA) Rape Advocacy Centers
- c) Statement of Fact written by the TDCJ PREA Coordinator dated 10/26/2024
- d) SPPOM Zero-Tolerance "End of Silence" PREA Poster in both English and Spanish provides guidance to reach out to the USPPM for emotional support from a Rape Crisis Center.

Interviews:

- 1) Interviews with Random Inmates

Observations made during the on-site audit and document review.

115.53 Provision (a)

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders shall be provided access to victim advocates for emotional support services related to sexual abuse by giving offenders mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, state, or national victim advocacy or rape crisis organizations. The unit shall enable reasonable communication between offenders and these organizations and agencies, in as confidential a manner as possible."

The SPPOM pamphlet states that, "For additional emotional support obtain information on a local Rape Crisis Center from the Unit Safe Prisons PREA Manager."

The agency had previously entered into a Memorandum of Understanding with (MOU) with "Mid-Coast Family Services" to provide all the services associated with standards 115.21 and 115.53. However, the advocate terminated the MOU, effective July 2024. The facility has provided a list of all TAASA Rape Advocacy Centers in the state of Texas. The Stevenson Unit is located in Region B and the only listed Rape Crisis Center in DeWitt County is the Mid-Coast Family Services. Therefore, the Auditor contacted the Advocate to discuss what, if any, services would the Rape Crisis Center provide inmates housed at the Stevenson Unit. The representative explained that if the inmate or Stevenson Unit staff would provide a return phone number then counselors could arrange for emotional support services.

The SPPOM pamphlet is located on the posters displayed in the housing units. The Auditor observed these pamphlets during the facility tour. In addition, every inmate that is transferred to the Stevenson Unit receives a Sexual Abuse Training Orientation. During this orientation, the inmate is once again provided information on how to contact the USPPM for the rape crisis center. This procedure is documented and acknowledged by signature from the inmate. The crisis intervention services are confidential, and the advocate has no duty to report, unless involving a juvenile or vulnerable adult, or if the inmate chooses to report.

During the on-site audit, the Auditor performed 41 inmate interviews. 26 inmates

were aware that services are available outside the facility for dealing with sexual abuse and 15 inmates stated that they were not sure or unaware of such services. Those inmates that were aware of the services also knew how to contact the crisis center. They were also cognizant that the communication with the crisis advocate is confidential. When asked if they could tell me about the kind of services there are; the inmates identified Victim Services, Shelters for Battered Women, Rape Crisis Center in Suing, TX, and the Sexual Violence National Hotline. The Auditor interviewed two inmates that reported sexual abuse, and both stated they were offered mental health, but declined any advocate counseling.

The facility provided a "Statement of Fact" from the PREA Coordinator explaining that the TDCJ does not detain individuals solely for civil immigration purposes, but TDCJ does make available foreign consulate general addresses for all foreign nationals.

The evidence collected for this provision shows that the agency has procedures in place to provide crisis intervention services from an outside advocacy group free of charge that is confidential. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.53 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders shall be informed, prior to giving them access, of the extent to which these communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws."

The Stevenson Unit informs inmates through the inmate sexual abuse information orientation to the extent of which communications will be monitored and to the extent of which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

The Auditor performed 41 inmate interviews. In those interviews, the 26 inmates that were aware of these services assumed that the information would remain confidential.

The evidence collected for this provision shows that the facility does inform inmates the extent to which their communications are being monitored. Therefore, through agency procedures, personal observations, and interviews conducted the facility has demonstrated that it meets this provision.

115.53 Provision (c)

The agency had previously entered into a Memorandum of Understanding (MOU) with "Mid-Coast Family Services" to provide all the services associated with standards 115.21 and 115.53. However, the advocate terminated the MOU, effective July 2024. The facility has provided those emails along with guidance that the Safe Prisons PREA Program will continuously be working on alternative options moving forward. The Facility did train two staff members in advocacy for those instances of when an advocate is necessary during a sexual abuse allegation requiring a forensic medical

	<p>examination. The facility has provided a list of all TAASA Rape Advocacy Centers in the state of Texas. The Stevenson Unit is located in Region B and the only listed Rape Crisis Center in DeWitt County is the Mid-Coast Family Services. Therefore, the Auditor contacted the Advocate to discuss what if any services would the Rape Crisis Center provide inmates housed at the Stevenson Unit. The representative explained that if the inmate or Stevenson Unit staff would provide a return phone number then counselors could arrange for emotional support services.</p> <p>The evidence collected for this provision shows that the facility has attempted to enter into a Memorandum of Understanding Contract with an outside advocacy group to provide the inmates emotional support as it relates to sexual abuse. However, that contract was terminated by the Rape Crisis Center and facility has trained staff in advocacy and the Rape Crisis Center still offers emotional support to those inmates that request counseling. Therefore, through the evidence presented, interviews conducted, and personal observation the facility has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the Auditor has determined that the facility is fully compliant with this standard requiring the facility provide inmate access to outside confidential support services.</p>
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115.54	Third-party reporting
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) Offender Orientation Handbook in English and Spanish c) General Information Guide for Families of Offenders d) TDCJ Public Website <p>Observations made during the on-site audit and document review.</p> <p>115.54 Provision (a)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “Family members or other individuals may report verbally or in writing to unit administration, the TDCJ Ombudsman office, OIG, or PREA ombudsman office any time they have knowledge of or suspect an</p>

	<p>offender has been sexually abused, sexually harassed, or requires protection.”</p> <p>The Offender Orientation Handbook states that, “The PREA Ombudsman is a point of contact for offenders who have complaints or inquire regarding allegations of sexual abuse or sexual harassment. Offenders may contact the PREA Ombudsman in writing; however, offender family members and friends may contact the PREA Ombudsman in writing or by phone.”</p> <p>Finally, the TDCJ General Information Guide for Families of Offenders booklet provides a mailing address and phone number for contacting the PREA Ombudsman.</p> <p>The TDCJ has published agency policy regarding the referral of allegations of sexual abuse or sexual harassment for criminal investigation on the agency website http://www.tdcj.texas.gov/tbcj/prea.html.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address third-party reports of sexual abuse or harassment both formally and publicly. Therefore, through document review and personal observations, the facility has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring a method to receive third-party reports alleging sexual abuse and distribute that information publicly.</p>
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115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Executive Directive PD-29 (Sexual Misconduct with Inmates) c) Correctional Managed Health Care Policy Manual (Sexual Abuse) <p>Interviews:</p> <ul style="list-style-type: none"> 1) Interviews with Random Staff 2) Interview with Warden

3) Interview with Medical and Mental Health Staff

4) Interview with PREA Coordinator (USPPM)

Observations made during the on-site audit and document review.

115.61 Provision (a)

TDCJ Safe Prisons/PREA Plan states in part that; "All staff members shall immediately report, according to TDCJ policy, any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred on a unit, whether or not it is a TDCJ facility; retaliation against offenders or staff who reported an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation."

During the interview process, the Auditor interviewed 12 random staff. All 12 staff members stated that they must immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to their supervisor. In addition, the facility provided examples of verbal reports, to both security and medical staff, of sexual abuse or harassment that was reported and investigated. In addition, the facility provided examples of anonymous and third-part reports being reported and investigated.

The evidence collected for this provision shows that the agency has procedures in place to address immediately reporting any knowledge, suspicion, or information regarding sexual abuse or sexual harassment. Therefore, through written policy, and interviews conducted the facility has demonstrated that it meets this provision.

115.61 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "Staff shall not reveal any information related to a sexual abuse report to anyone other than designated supervisors or officials, and only to the extent necessary to make informed treatment, investigative, security, and management decisions."

During the interview process, the Auditor interviewed 12 random staff. All 12 staff members stated that they must immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to their supervisor and must only relay information on a 'need to know' basis.

During the review of investigative files, the investigative reports indicated that when medical staff was made aware of an allegation of sexual abuse they immediately notified the USPPM.

The evidence collected for this provision shows that the agency has procedures in place to address not revealing information related to a sexual abuse report to anyone other than to the extent necessary. Therefore, through written policy, and interviews conducted the facility has demonstrated that it meets this provision.

115.61 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; “Unless otherwise precluded by federal, state, or local law, and at the initiation of services, medical and mental health practitioners shall be required to report sexual abuse pursuant to Section IV.B.1 of this plan, and to inform offenders of the practitioner’s duty to report, as well as the limitations of confidentiality.” The CMHC Policy further indicates that if an inmate who is 18 years of age or older informs health care staff about prior sexual abuse that occurred in the community, health care staff may only report to OIG if the inmate gives consent.

The Auditor interviewed the Health Services Supervisor. The medical supervisor stated that they do notify the inmates of the duty to report sexual abuse allegations and the limitations surrounding confidentiality. She also stated that they have a duty to report all suspicions, knowledge, or information regarding sexual abuse. In addition, the medical supervisor stated that she had not experienced a situation where an inmate had personally reported sexual abuse to her during this rating period, but did experience a situation approximately twelve years ago at a different facility where the inmate was brought to the medical unit and informed staff of a sexual abuse. A medical assessment was completed, and then mental health was notified, as was security staff. When interviewing the Mental Health Professional, she confirmed the same practices and informed the Auditor that she had not experienced a situation where an alleged sexual abuse was made to her, but if it was to occur then she would speak to the inmate, notify security staff, and keep the inmate in the office so that they would remain safe.

The evidence collected for this provision shows that the agency has procedures in place to require medical and mental health practitioners to report any incidents they have been made aware of involving the knowledge, suspicion, or information regarding sexual abuse. Therefore, through written policy, and interviews conducted the facility has demonstrated that it meets this provision.

115.61 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; “In accordance with CMHC policies, medical and mental health practitioners shall obtain informed consent from offenders before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the offender is under the age of 18.” CMHC Policy directs medical staff that if made aware of an inmate who is less than 18 years old and reports prior sexual abuse, regardless of whether the incident occurred in a confinement setting or in the community, health care staff must report the incident to OIG and inmate consent is not required. If an inmate reports previous sexual abuse to health care staff that occurred in a confinement setting, health care staff must report the incident to the warden or designee. The inmate is made aware at the initiation of services that medical staff has a duty to report all instances of sexual abuse without restriction to any confidentiality.

When the Warden was interviewed, he stated that the Stevenson Unit does not house any juveniles. However, they could house vulnerable adults. The Warden indicated that he was not sure if there is a requirement to report abuse involving vulnerable

adults. When an interview was conducted with the PREA Coordinator she indicated that only three TDCJ facilities house offenders under the age of 18.

The PREA Coordinator was asked a similar question, and she explained that the Texas mandatory reporting laws for vulnerable adults requires that any Texas adult, who believes that a person who is 65 or older and those 18 to 64 with mental, physical, intellectual, or developmental disabilities and substantially impaired (elderly or disabled) is in a state of abuse, neglect, or financial exploitation is required to immediately report to the Texas Department of Family (DFPS) and Texas Adult Protective Services (APS). She further indicated that if it were determined during the investigation a sexual abuse did occur to a vulnerable adult then the OIG is responsible for notification to the Texas APS.

The evidence collected for this provision shows that the agency has procedures in place to require staff to report sexual abuse involving individuals under the age of 18 and vulnerable adults to the designated state or local services in accordance with applicable mandatory reporting laws. Therefore, through written policy, and interviews conducted the facility has demonstrated that it meets this provision.

115.61 Provision (e)

TDCJ Safe Prisons/PREA Plan states in part that; "Investigations involving allegations of sexual abuse shall be conducted by investigators who have received special training in sexual abuse investigations pursuant to this plan." The policy further states that, "Investigations of sexual abuse, threatened sexual abuse, and sexual harassment shall be conducted promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports."

During the document review, the Auditor reviewed 9 investigations. The investigation reports revealed that the source of the allegations were 4 reports made verbally to staff, 4 written allegations, and 1 report made by a third-party. In all 9 cases, to include criminal investigations, a PREA investigator (Facility Investigator) or (OIG Investigator) was assigned to conduct the investigation. The Warden was also interviewed and explained that all allegations of sexual abuse and sexual harassment (including third-party reports) are assigned to a PREA trained investigator.

The evidence collected for this provision shows that the agency has procedures in place to ensure that all allegations of sexual abuse are turned over to a PREA designated investigator to initiate an inquiry. Therefore, through written policy, document review, and interviews conducted the facility has demonstrated that it meets this provision.

Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring staff and agency reporting duties.

115.62	Agency protection duties
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1458 412">The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p data-bbox="256 456 432 490">Documents:</p> <p data-bbox="256 524 740 557">a) TDCJ Safe Prisons/PREA Plan</p> <p data-bbox="256 602 416 636">Interviews:</p> <p data-bbox="256 669 756 703">1) Interviews with Random Staff</p> <p data-bbox="256 748 660 781">2) Interview with Warden</p> <p data-bbox="256 815 740 848">3) Interview with Agency Head</p> <p data-bbox="256 893 1198 927">Observations made during the on-site audit and document review.</p> <p data-bbox="256 960 544 994">115.62 Provision (a)</p> <p data-bbox="256 1028 1458 1565">TDCJ Safe Prisons/PREA Plan states in part that; "All staff members shall immediately report, according to TDCJ policy, any knowledge suspicion, or information regarding an incident of sexual abuse or sexual harassment, retaliation against offenders or staff who reported an incident, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Offenders at high risk for sexual victimization shall not be placed in protective safekeeping unless an assessment of all other available alternatives has been made, and it is determined that there are no available alternative means of separation from likely abusers. If the assessment cannot be completed immediately, the unit may hold the offender in involuntary segregated housing while completing the assessment, for no longer than 24 hours. If a protective safekeeping housing assignment is made, the unit shall clearly document the basis of the concern for the offender's safety and the reason why no alternative means of separation can be arranged."</p> <p data-bbox="256 1599 1474 1890">Interviews were conducted with 12 random staff. Of those staff interviewed, all 12 staff members stated that they would immediately remove the inmate from the situation, block, or housing unit. In addition, they stated that they would immediately notify a supervisor. The Warden was also interviewed. In that interview, it was stated that the individual must be kept separate and possibly placed in "inmate protective status" until an investigation could be conducted. The Agency Head indicated that his agency would take immediate action to protect the inmate.</p> <p data-bbox="256 1924 1442 2002">The facility reported no instances requiring immediate action be taken to protect an inmate from sexual abuse that occurred during this rating period.</p> <p data-bbox="256 2036 1426 2069">The evidence collected for this provision shows that the agency has procedures in</p>

	<p>place to address when an inmate is subject to a substantial risk of sexual abuse and immediate action is taken to protect that inmate. Therefore, through written policy, document review, and interviews conducted the facility has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring agency protection duties.</p>
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115.63	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Safe Prisons/PREA Operations Manual <p>Interviews:</p> <ul style="list-style-type: none"> 1) Interview with Warden 2) Interview with Agency Head <p>Observations made during the on-site audit and document review.</p> <p>115.63 Provision (a), (b), (c) and (d)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “After receiving an allegation that an offender was sexually abused while confined at another facility, such as a county jail or out of state facility, the individual taking the initial report shall immediately notify the USPPM. The USPPM shall provide the SPPMO with the details of the alleged incident so the SPPMO may initiate notification to the appropriate office of the outside agency where the alleged abuse occurred. The SPPMO shall provide the notification to the appropriate agency as soon as possible, but no later than 72 hours after receiving the allegation. The SPPMO shall document the notification. Any TDCJ warden or departmental office receiving notification from an outside agency that an offender in the outside agency’s custody alleged sexual abuse while assigned to TDCJ custody shall ensure the allegation is forwarded to the PREA ombudsman in accordance with, “Prison Rape Elimination Act Complaints and Inquiries,” for possible investigation.”</p>

	<p>The Stevenson Unit reported no instances over the last twelve months where notification was made to another confinement facility about an allegation of sexual abuse.</p> <p>The Auditor reviewed 9 sexual abuse and harassment investigations files. No investigations evolved from either a report from an outside correctional facility or evidence of an inmate reporting a sexual abuse or harassment to the facility. When the Warden was interviewed, he stated that if he was to receive any notifications of alleged sexual abuse that occurred at his facility they are immediately assigned to an investigator to investigate. If it appears to be criminal in nature, then the OIG is contacted to investigate. The Agency Head stated that all reports of sexual abuse or sexual harassment are investigated no matter the source.</p> <p>The evidence collected for these provisions shows that the agency has procedures in place to address when an allegation of sexual abuse is received from an inmate, but the incident occurred at a different confinement facility and when an allegation of sexual abuse is received from another agency. Also, they have a policy in place to govern when and how to handle allegations received by their agency regarding sexual abuse allegations made that occurred at another outside confinement facility. Therefore, through written policy, document review, and interviews conducted the facility has demonstrated that it does meet these provisions.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring the reporting to other confinement facilities and investigating reports from other confinement facilities.</p>
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115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Administrative Directive AD-16.03 (Evidence Handling) c) TDCJ Safe Prisons/PREA Operations Manual <p>Interviews:</p>

- 1) Interview with Security Staff First Responders
- 2) Interviews Non-Security Staff
- 3) Interviews with Random Staff

Observations made during the on-site audit and document review.

115.64 Provision (a)

TDCJ Safe Prisons/PREA Plan states in part that; "After learning of an allegation that an offender was sexually abused, the first correctional officers responding to the report shall:

- a. Notify a security supervisor.
- b. Separate the alleged victim and assailant.
- c. Preserve and protect the crime scene, if applicable, until appropriate steps can be taken to collect any evidence.
- d. Be required to 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, if the abuse occurred within a time period that still allows for the collection of physical evidence.
- e. Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence.
- f. Refer the alleged victim and known abuser to medical and mental health services for examination and evaluation. If medical and mental health staff are not available at the time the allegation is made, staff first responders shall take preliminary steps to protect the victim and shall notify on-call medical or mental health staff. The nature and scope of treatment shall be determined by medical and mental health practitioners in accordance with CMHC policies and Section II.G of this plan.
- g. As appropriate, the services of a victim advocate or an OVR shall be made available in accordance with this plan.
- h. Additional information regarding coordinated response procedures may be found in the SPPOM."

The facility reported 6 allegations of alleged sexual abuse. Of those 6 cases, security staff were first responders in 5 incidents. An interview with a security staff first responder was conducted. The first responder was asked to describe the actions taken when first on the scene of an alleged inmate sexual abuse allegation. The first responder stated that he would make sure the scene was safe, separate the victim and alleged abuser, report to a supervisor, preserve the evidence, notify medical personnel, and protect the possible crime scene. The Auditor interviewed two inmates

that had reported sexual abuse. One inmate explained that he contacted the USPPM regarding a staff-on-inmate allegation. The staff member was removed from the post until an investigation was initiated. The second allegation was regarding an inmate-on-inmate allegation and those inmates were separated.

The evidence collected for this provision shows that the agency has procedures in place to address the responsibilities of staff first responders when confronted with an allegation of an inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted the facility has demonstrated that it meets this provision.

115.64 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "If the first staff responder is not a correctional officer, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and shall immediately notify a correctional officer. Any use of protective safekeeping to protect an offender who is an alleged sexual assault victim shall be subject to the requirements of Section III.C.3-7 of this plan. An administrative and criminal investigation, as appropriate, shall be completed for all allegations of sexual abuse and sexual harassment."

The facility reported no instances of alleged sexual abuse where the first responder was not a security staff member. When conducting interviews, 12 random staff were questioned about their responsibilities when confronted with an allegation of inmate sexual abuse. The responses were broken down into the following ways. As a side note, the Auditor has incorporated the staff's multiple responses into the listed general topics.

- 2 staff members stated they would separate the victim and abuser
- 4 staff members would contact a supervisor
- 2 staff members cited preserving evidence
- 6 staff members said they would secure the scene

In addition, the Auditor interviewed a contractor and a volunteer during this audit and both non-security staff stated that they would immediately notify a security staff member.

The evidence collected for this provision shows that the agency has procedures in place to address the responsibilities of non-security staff first responders when confronted with an allegation of an inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted the facility has demonstrated that it meets this provision.

Conclusion

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring staff first responder duties.

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <p>a) TDCJ Stevenson Unit Sexual Abuse Coordinated Response Plan</p> <p>Interviews:</p> <p>1) Interview with Warden</p> <p>Observations made during the on-site audit and document review.</p> <p>115.65 Provision (a)</p> <p>The Stevenson Unit provided an outlined coordinated response plan in the form of a six-page institutional plan for the facility to follow when confronted with an inmate sexual abuse incident. The document outlines the procedures/steps to follow and includes the actions of the security first responders, OIG Investigators responsibility, Medical & Mental Health Services, Highest Ranking Security Supervisor, Facility Leadership, and the PREA Compliance Manager (USPPM). In an interview with the Warden, it was confirmed that the facility uses a coordinated response plan to follow when dealing with incidents of alleged inmate sexual abuse.</p> <p>The evidence collected for this provision shows that the agency has a coordinated response plan to follow during incidents of alleged inmate sexual abuse. Therefore, through written policy, and interviews conducted the facility has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring a coordinated response.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence relied upon to make Compliance Determination:

	<ol style="list-style-type: none"> 1. Policy and Document Review 2. Pre-Audit Questionnaire 3. TDCJ Safe Prisons/PREA Plan 4. Specialty Staff Interview Notes 5. Central Headquarters Statement of Fact <p>As notated in the PAQ and during an interview with the Agency Head Designee, collective bargaining is not recognized by Texas Department of Criminal Justice. TDCJ employees do not participate in collective bargaining.</p> <p>After a careful and detailed review of all the information, the Auditor determined the Agency meets the requirements of this standard.</p> <p>The Texas Department of Criminal Justice performed an agency PREA audit that was finalized and received on November 21, 2024, in the form of a Final PREA Audit Report. In addition, the TDCJ completed a prior agency PREA audit in September 2023. In both cases, the agency was found to have been in compliance with Standard 115.66 by the PREA Auditor and a determination of “meets the standard” as the overall determination. This facility (Stevenson Unit) strictly follows the policies, procedures, and protocols established and instituted by the TDCJ.</p>
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115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ol style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Safe Prisons/PREA Operations Plan c) Retaliation Monitoring Form <p>Interviews:</p> <ol style="list-style-type: none"> 1) Interview with Agency Head 2) Interview with Warden 3) Interview with Staff Member charged with Monitoring Retaliation

Observations made during the on-site audit and document review.

115.67 Provision (a)

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations shall be protected from retaliation by other offenders or staff. The USPPM shall monitor for incidents of retaliation in accordance with the SPPOM."

The designated staff member charged with monitoring possible retaliation at the Stevenson Unit is the PREA Compliance Manager USPPM. The facility provided copies of retaliation 90-Day Monitoring/Status Check History documentation as evidence in the PAQ, and the Auditor observed these forms when conducting document review while on-site and downloaded investigation files in the PAQ.

The evidence collected for this provision shows that the agency has procedures in place and staff to monitor retaliation associated with reports of sexual abuse. Therefore, through written policy and document review the facility has demonstrated that it meets this provision.

115.67 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "As appropriate, multiple protective measures may be taken, such as housing changes or transfers for offender victims or abusers, removal of alleged staff or offender abusers from contact with victims, and emotional support services for offender or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations."

When interviewing the Warden, he explained that they could use multiple ways to protect inmates or staff from retaliation. The Warden spoke of having the USPPM monitor possible retaliation along with discipline and staffing changes. The Agency Head spoke of unit moves, transfers, and emotional support. The Agency Head reiterated the agency has zero-tolerance for retaliation. The staff member charged with monitoring retaliation stated that she remains in touch with the inmate for 90 days. She indicated that she monitors housing placement, disciplinary infractions, changes in jobs or programs, and looks for any filed grievances. The staff member charged with monitoring retaliation was asked how often they speak with the individuals being monitored. The staff member charged with monitoring retaliation, stated that she speaks with the inmate every 30 days face-to-face up until the investigation is complete or the 90-day threshold.

The evidence collected for this provision shows that the facility employs multiple protection measures for those inmates and staff who fear retaliation. Therefore, through document review, and interviews conducted the facility has demonstrated that it meets this provision.

115.67 Provision (c)

TDCJ Safe Prisons/PREA Operations Manual states in part that; "Following a report of

sexual abuse, voyeurism, or sexual harassment, the Warden or USPPM shall monitor and document the conduct and treatment of staff and offenders who reported the incident, cooperated with the investigation as a witness to the allegation, and of offenders who suffered as the victim of sexual abuse, voyeurism, or sexual harassment to determine potential risks or acts that may suggest possible retaliation. The Warden or USPPM shall act promptly to remedy any such indication of retaliation. The warden and USPPM shall monitor staff and offenders for at least 90 calendar days following an allegation of sexual abuse, voyeurism or sexual harassment. Monitoring shall continue beyond the initial 90 days on a case-by-case basis when the initial monitoring period indicates a continuing need. The warden or designee shall monitor all staff members that reported the abuse or harassment or cooperated as a witness with the investigation. Status check shall be conducted at a frequency of no less than once per month.”

The Warden indicated that when he suspects retaliation, he would make sure the victim and abusers were separated and refer the incident for investigation. The Warden stated that disciplinary action would be the result if the investigation findings were substantiated in cases involving inmates. If staff were involved then it could be a violation of standards of conduct, and they too could be disciplined. Based on the findings of that investigation, staff may be reassigned or receive discipline up to termination. Inmates can be charged both with in-house charges and criminal prosecution or transferred to a different confinement facility. The staff member charged with retaliation monitoring stated that she monitors individuals for at least 90 days, or longer, if she feels it necessary. The PREA Compliance Manager (USPPM) stated that retaliation monitoring would discontinue if the case was unfounded.

The evidence collected for this provision shows that the facility monitors both staff and inmates who have alleged sexual abuse or assisted in the investigation for a minimum of 90 days. Therefore, through written policy, document review, and interviews conducted the facility has demonstrated that it meets this provision.

115.67 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; “The monitoring shall also include periodic status checks of offenders.”

TDCJ Safe Prisons/PREA Operations Manual directs the USPPM to monitor offender victims, offenders who reported the abuse and offender witnesses that corroborated with the investigation by conducting status checks at least once a month.

When conducting the interview with the staff member responsible for monitoring retaliation, she stated that she monitors the situation by checking disciplinary reports, changes in housing, and changes in job positions. She also stated that she would meet with the individuals involved face to face every 30 days.

The evidence collected for this provision shows that the facility monitors inmates for retaliation periodically. Therefore, through policy and interviews conducted the facility has demonstrated that it meets this provision.

	<p>115.67 Provision (e)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “If any other individual who cooperates with an investigation expresses a fear of retaliation, the TDCJ shall take appropriate measures to protect that individual against retaliation.”</p> <p>When conducting the interview with the Agency Head, he stated that they can assign the inmate to another facility unit. The Warden stated that the USPPM monitors those situations and that an inmate engaging in retaliation may be moved to a different housing assignment or to an entirely different facility. The Warden also stated that if staff were engaged in retaliation then the staff member would be dealt with using the disciplinary process.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address protection for other individuals who cooperate with PREA investigations from retaliation. Therefore, through written policy the facility has demonstrated that it meets this provision.</p> <p>115.67 Provision (f)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “If the TDCJ investigation determines the allegation to be unfounded, the monitoring shall be discontinued.”</p> <p>During the interview with the USPPM, she indicated that the retaliation monitoring would terminate if the investigation determined the incident allegation was unfounded.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to address the facility’s obligation to continue monitoring for retaliation if the agency determines the allegation is unfounded. Therefore, through written policy and interviews conducted the facility has demonstrated that it meets this provision.</p> <p>Conclusion</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring agency protection from retaliation.</p>
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115.68	Post-allegation protective custody
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p>

- a) TDCJ Safe Prisons/PREA Plan
- b) TDCJ Restrictive Housing Plan

Interviews:

- 1) Interview with Warden
- 2) Staff who Supervise Inmates in Segregated Housing

Observations made during the on-site audit and document review.

115.68 Provision (a)

TDCJ Safe Prisons/PREA Plan states in part that; "Any use of protective safekeeping to protect an offender who is an alleged sexual assault victim shall be subject to the requirements of Section III.C.3-7 of this plan."

TDCJ Safe Prisons/PREA Plan along with the Restrictive Housing Plan provides guidance to staff for when to place inmates at high risk for sexual victimization into involuntary restrictive housing. This can only be done after 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. If a facility cannot conduct an immediate assessment, then the facility may hold the inmate in involuntarily restrictive housing for no more than 24 hours while completing the assessment.

During this audit period, the facility reported that they had not assigned any inmate who alleged to have suffered sexual abuse to involuntary segregated housing, for the purpose of separating that inmate due to no other housing alternatives. During the facility tour, the Auditor visited the restricted housing cells that were being utilized and reviewed the cell assignments to verify that no inmate was being housed involuntarily due to sexual abuse.

The Warden stated during his interview, that only in a situation where there were no alternatives, would an inmate be placed in restrictive housing due to alleged sexual abuse victimization. He stated that if necessary, the alleged perpetrator would be placed in restrictive housing.

The staff member working in a segregated housing unit was interviewed and indicated that if an inmate was transferred to RHU due to either being a possible alleged victim or protection from possible sexual abuse, they would still have access to all the privileges and programs as those inmates assigned to general population. If they limited access to these programs, then they would have to document and explain why the opportunities were limited, the duration, and the reason. Finally, the staff member that supervises inmates in segregation was asked if the facility reviews the inmate's situation every thirty days to determine if the housing assignment is still needed. The staff member that supervises inmates in segregation stated, "Yes, administrators reviews all housing assignments in the RHU once a week."

	<p>The facility reported no instances during this rating period where an inmate was placed in restrictive housing due to being a victim of sexual abuse.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that if an inmate is placed in segregation due to alleging sexual abuse then that inmate would retain all the privileges and opportunities that all other inmates are afforded. Therefore, through written policy, personal observations, and interviews conducted, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring limitation on protective custody.</p>
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115.71	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TBCJ Office of Inspector General (OIG) Policy 7.13 (Inmate Sexual Assault Investigations) c) TDCJ Administrative Directive AD-02.15 (Operations of the Emergency Action Center) d) TDCJ Executive Directive ED-02.29 (Records Management) <p>Interviews:</p> <ul style="list-style-type: none"> 1) Interview with Warden 2) Interview with Investigative Staff 3) Interview with PREA Coordinator 4) Interview with PREA Compliance Manager (USPPM) <p>Observations made during the on-site audit and document review.</p> <p>115.71 Provision (a)</p>

TDCJ Safe Prisons/PREA Plan states in part that; "Investigations of sexual abuse, threatened sexual abuse, and sexual harassment shall be conducted promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports."

TBCJ OIG Policy addresses that in order to comply with PREA Standards, when information is received and reveals that a sexual abuse has occurred or allegations of a sexual abuse, to include third party and anonymous reports, investigators are required to initiate a sexual assault investigation.

The Auditor reviewed 9 investigative files during the document review. The average time it took to initiate an investigation across the 9 cases was approximately one day. The files contained both physical and circumstantial evidence, witness, victim, and alleged abuser interviews amongst other factual documents. During the interview with the OIG investigative staff, the investigator stated that a PREA officer conducts an initial inquiry immediately after notification has been made and informs the OIG the need to investigate if it involves a criminal act or staff-on-inmate allegations. The Facility Investigator and OIG Investigator stated that anonymous and third-party reports are handled in the exact same manner as all other sexual abuse allegations.

The evidence collected for this provision shows that the agency has procedures in place to ensure that it investigates sexual abuse allegations promptly, thoroughly, and objectively. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.71 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "Investigations involving allegations of sexual abuse shall be conducted by investigators who have received special training in sexual abuse investigations pursuant to this plan."

The Stevenson Unit reported that the facility has 17 PREA certified facility investigators. Most supervisory staff at the Stevenson Unit have received the specialized training to conduct administrative sexual abuse investigations in a confinement setting. During the pre-audit phase, this Auditor requested training records for the PREA Facility Investigators. The facility provided that information and the Auditor verified that those investigators had received special sexual abuse training in a confinement setting. During the interview process, the OIG Investigator confirmed that he had received the specialized training two months ago. The Facility Investigator was also interviewed and indicated that she had attended an investigator class in Huntsville, Texas several years ago.

The evidence collected for this provision shows that the agency has procedures in place to ensure that only specially trained sexual abuse investigators conduct investigations into sexual abuse allegations. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.71 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; "Investigations shall include, at a minimum, interviews with alleged victims, suspected assailants, and witnesses; a review of prior complaints and reports of sexual abuse involving the alleged assailant; review of video surveillance where available; and any evidence, including physical evidence."

TBCJ OIG Policy directs unit personnel to secure the crime scene and, to the degree possible, the alleged suspect(s) be placed in a secured area that will prevent the destruction of physical or biological evidence. OIG Investigators are directed to immediately respond to the scene to initiate an investigation, interview the victim, determine if a forensic medical examination will be offered, and examine and process the crime scene.

The Auditor reviewed 9 administrative investigation files. Of those investigations, two investigations contained physical or circumstantial evidence, witness statements, victim, and perpetrator interviews. All files contained victim and perpetrator interviews and witness statements.

When conducting the interview with the OIG Investigator, he stated that usually the Facility Investigator determines if the allegation is a sexual abuse allegation, and if so, the facility notifies the Emergency Action Center (EAC). The EAC will then make contact with the OIG. Once assigned to the case, the investigator would then begin answering the questions of who, what, when, where, and how. The OIG Investigator would also collect evidence, both physical and circumstantial. The OIG Investigator stated that he would collect forensic evidence, clothing, victim statements, and interview all witnesses.

The evidence collected for this provision shows that the agency has procedures in place to ensure that TBCJ OIG Investigators collect circumstantial evidence and direct evidence. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.71 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; "When the evidence supports criminal prosecution, OIG shall conduct compelled interviews only after consulting with prosecutors to ensure the interviews do not impede subsequent criminal prosecution."

There are no examples of investigative reports supporting compelled statements. When asked about compelling staff to answer questions, the OIG Investigator explained that he would not conduct a compelled interview. The Facility Investigator indicated that she would not conduct compelled interviews and that decision would be up to the OIG in accordance with policy, but they must first consult with the prosecuting attorney.

The evidence collected for this provision shows that the agency has procedures in place governing compelled interviews. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this

provision.

115.71 Provision (e)

TDCJ Safe Prisons/PREA Plan states in part that; “The credibility of an alleged victim, assailant, or witness shall be assessed on an individual basis and not on the status as an offender or staff member.” The policy further states that, “An offender who alleges sexual abuse shall not be required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of the allegation.”

The OIG Investigator was interviewed, and stated that he treats every allegation the same and handles them in a serious manner. The Investigator also stated that polygraphs are not used to determine truthfulness in allegations of sexual abuse. The two inmates interviewed that reported sexual abuse informed the Auditor that they were not required to submit to a polygraph to further the investigation.

The evidence collected for this provision shows that the agency has procedures in place ensuring that an individual’s credibility shall not be determined by the person’s status as an inmate or staff member. Furthermore, polygraph examinations will not be used as a condition for proceeding with the investigation of a sexual abuse allegation. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.71 Provision (f)

TDCJ Safe Prisons/PREA Plan states in part that; “Information regarding staff action or inaction that may have contributed to the alleged abuse shall be included in the investigative report. Staff shall document the description of physical and testimonial evidence in the body of the report, the reasoning behind credibility assessment, and investigative facts and findings.” The policy further states that, “Administrative investigations shall include an effort to determine if staff actions or inactions contributed to the abuse and 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.”

The investigative files examined during the document review phase did contain language as to if TDCJ policies and procedures were followed in the incident.

When interviewing both the OIG Investigator and Facility Investigator they indicated that they would try to determine, during the administrative investigation, whether staff actions or failure to act contributed to the sexual abuse. The investigators also stated that all administrative investigations are documented and that witness statements, incident reports, circumstantial evidence, audio, and video evidence would be found in an administrative investigation file.

The evidence collected for this provision shows that the agency has procedures in place to ensure efforts are made to determine if staff actions or failures contributed to sexual abuse. Therefore, through written policy, document review, and interviews

conducted, the facility has demonstrated that it meets this provision.

115.71 Provision (g)

TDCJ Safe Prisons/PREA Plan states in part that; “Staff shall document the description of physical and testimonial evidence in the body of the report, the reasoning behind credibility assessment, and investigative facts and findings. Criminal investigations shall be documented in accordance with OIG policies and procedures.”

The OIG Investigator confirmed that all criminal investigations shall be documented and that the evidence located in the file would be the same as what is placed in the administrative file.

The evidence collected for this provision shows that the OIG conducts all criminal investigations. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.71 Provision (h)

TDCJ Safe Prisons/PREA Plan states in part that; “Substantiated allegations of conduct that appear to be criminal shall be referred for prosecution in accordance with OIG policies and procedures.”

The Facility Investigator indicated that all criminal cases are referred to the prosecuting attorney for a decision regarding prosecution. The OIG Investigator stated that he would refer the case for prosecution at the conclusion of the investigation.

The evidence collected for this provision shows that the OIG does conduct criminal investigations and will refer substantiated cases for criminal prosecution. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.71 Provision (i)

TDCJ Safe Prisons/PREA Plan states in part that; “All administrative and criminal investigations shall be retained in accordance with the TDCJ Records Retention Schedule.” The policy further indicates that, “All sexual abuse data collected shall be maintained for at least 10 years after the date of the initial collection unless federal, state, or local law requires otherwise.”

Review of the agency’s Records Retention Schedule identifies that offender protection investigation summaries, investigation forms, witness statements/report, investigation checklist, and subsequent offender interviews are classified as “PM” permanent. The rule is these documents must be microfilmed as part of the classification folder.

The evidence collected for this provision shows that the agency has procedures in place to ensure written investigative reports are retained for as long as the alleged abuser is incarcerated or employed by the agency plus five years. Therefore, through written policy and document review the facility has demonstrated that it meets this

provision.

115.71 Provision (j)

TDCJ Safe Prisons/PREA Plan states in part that; “The departure of the alleged assailant or victim from employment or from custody of the TDCJ shall not be the basis for terminating an investigation.”

The OIG Investigator was asked how he would proceed when a staff member alleged to have committed sexual abuse terminates employment prior to a completed investigation. The investigator explained that he would still follow through with the investigation regardless of if the staff member left employment or if the alleged victim was released from TDCJ custody. The Facility Investigator indicated that if the case involved staff then it would be turned over to the OIG. The Facility Investigator indicated that if it was an inmate then she would continue the investigation, and if necessary, make arrangements with the receiving facility to continue the investigation.

The evidence collected for this provision shows that the agency has procedures in place to ensure that an administrative investigation continues regardless of whether the abuser or victim is no longer employed or under the agency’s control. Therefore, through written policy and interviews conducted the facility has demonstrated that it meets this provision.

115.71 Provision (l)

TDCJ Safe Prisons/PREA Plan states in part that; “Unit staff conducting OPIs shall cooperate with the OIG when applicable, to avoid interfering with possible criminal investigation related to the same incident.”

Interviews were conducted with the Warden, PREA Coordinator, USPPM, and Investigative Staff about this provision. The PREA Coordinator, PREA Compliance Manager, and Warden were asked who investigates criminal allegations of sexual abuse and how would the agency remain informed of the progress of a criminal sexual abuse case. The PREA Coordinator, Warden, and USPPM responded by stating that the OIG conducts all criminal investigations. The PREA Coordinator indicated that each unit USPPM would remain informed by the ongoing criminal investigation. The Warden stated that he would be the point of contact for the OIG, and the USPPM indicated that each unit has an OIG Investigator assigned to the facility. That individual would keep the USPPM informed of the progress of the investigation. The OIG Investigator was asked what role he plays in a criminal investigation by an outside agency. The OIG Investigator explained that if an outside law enforcement agency was to get involved then he would help facilitate their needs. When the same question was asked of the Facility Investigator she also indicated that she would assist and facilitate the outside agency’s needs.

The evidence collected for this provision shows that the agency has procedures in place to try and stay informed about ongoing criminal sexual abuse investigations amongst their own facilities. Therefore, through written policy and interviews

	<p>conducted the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring criminal and administrative agency investigations.</p>
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115.72	Evidentiary standard for administrative investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <p>a) TDCJ Safe Prisons/PREA Plan</p> <p>Interviews:</p> <p>1. Interview with Investigative Staff</p> <p>Observations made during the on-site audit and document review.</p> <p>115.72 Provision (a)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “No standard higher than the preponderance of evidence shall be imposed in determining if allegations of sexual abuse or sexual harassment are substantiated.”</p> <p>The OIG Investigator and Facility Investigator were asked what evidence is required to substantiate allegations of sexual abuse. The OIG Investigator stated that for a criminal case probable cause must be present. In an administrative investigation, the preponderance of the evidence or 51% of the evidence suggests one way or the other. When interviewing the Facility Investigator, she indicated that in determining if an allegation of sexual abuse or sexual harassment is substantiated, one must use the preponderance of the evidence standard.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual assault are substantiated. Therefore, through written policy, and interviews conducted, the facility has demonstrated that it meets this provision.</p> <p>The Auditor reviewed 9 administrative investigative files and believes that the documentation of the administrative findings were the proper standard of proof.</p>

	<p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring evidentiary administrative investigations.</p>
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115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Safe Prisons/PREA Operations Manual c) Offender Notification Brochure d) Examples of PREA Investigative Findings Notifications <p>Interviews:</p> <ul style="list-style-type: none"> 1) Interview with Warden 2) Interview with Investigative Staff 3) Inmates who Reported a Sexual Abuse <p>Observations made during the on-site audit and document review.</p> <p>115.73 Provision (a)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “Following an OPI committee review, the committee shall inform the offender if the allegations were determined to be substantiated, unsubstantiated, or unfounded.”</p> <p>TDCJ Safe Prisons/PREA Operations Manual indicates that the offender shall be informed as to whether the investigative finding was substantiated, unsubstantiated, or unfounded.</p> <p>Stevenson Unit reported 6 investigations of alleged sexual abuse and 3 investigations of alleged sexual harassment during the last twelve months that were completed by the facility. The Auditor reviewed 9 administrative cases where evidence of notification was made and documented in 8 of those cases. The one case that was missing was due to the inmate being transferred to a different facility.</p>

During the interview with the Facility Investigative staff, the investigator stated that once the investigation has been completed and reviewed, the Unit Classification Committee (UCC) is notified and the inmate made aware of the findings both verbally and in writing. A letter with the investigative findings is given to the inmate in all administrative cases and the inmate receives a signed copy acknowledging receipt of the notification. When a PREA case is investigated by the OIG, the OIG Investigator stated that the OIG sends the notification to the Safe Prisons/PREA Management Office to forward to the appropriate facility for notification. During the Warden interview he stated that, "The findings comes to the UCC, and they inform the inmate then the inmate signs the notification form." Both inmates that reported sexual abuse confirmed to the Auditor that they had been notified of the investigation outcome.

The evidence collected for this provision shows that the agency has procedures in place to inform the inmates who allege sexual abuse of the findings of the investigation. Therefore, through written policy, and interviews conducted, the facility has demonstrated that it meets this provision.

115.73 Provision (b)

TDCJ Safe Prisons/PREA Plan states that, "The TDCJ Safe Prisons/PREA Manager (SPPM) shall ensure the relevant criminal information is received from the OIG in order to inform the offender."

The facility has reported that the OIG investigated six allegations of sexual abuse over the past twelve months.

The evidence collected for this provision shows that the agency uses the OIG to conduct their criminal investigations and evidence that notifications were made in six cases investigated by the OIG. Therefore, through policy, document review and interviews conducted the Auditor has determined that the facility is compliant with this provision.

115.73 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; "If an offender is determined to have been a victim of staff-on-offender sexual abuse, the warden shall inform the offender when:

- a. The staff member is no longer assigned to the offender's unit; or
- b. The staff member is no longer employed by the TDCJ.

If an offender is determined to have been a victim of staff-on-offender sexual abuse and the abuse is determined criminal, the SPPMO shall inform the offender when:

- a. The staff member has been indicted on a charge related to sexual abuse within the unit; or
- b. The staff member has been convicted on a charge related to sexual abuse within the unit."

The facility reported six instances during this rating period where allegations of sexual abuse were made regarding staff being the alleged perpetrator. In all six incidents, the staff member was removed from the assigned post and in one instance the support staff member resigned. The facility provided documentation of instances involving alleged staff-on-inmate sexual abuse where the officers were removed from that particular housing unit/post until the completion of the investigation. There were no cases that involved criminal charges or convictions. Both inmates that reported alleged sexual abuse indicated that the staff member was moved from the unit until the completion of the investigation.

The evidence collected for this provision shows that the agency has procedures in place to inform alleged inmate victims when the alleged staff perpetrator's criminal circumstances change due to the sexual abuse allegation. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.73 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; "If an offender alleges to have been a victim of offender-on-offender sexual abuse, the SPPMO will subsequently inform the alleged victim when the alleged assailant has been indicted on a charge related to sexual abuse within the unit, or the alleged assailant has been convicted on a charge related to sexual abuse within the unit."

The Auditor reviewed nine sexual abuse and sexual harassment allegations. From this document review, there were no cases involving inmate-on-inmate sexual abuse allegations. There were three sexual harassment allegations, but the investigation determined the cases to be either unsubstantiated or unfounded. However, in each incident, the alleged aggressor was separated and housing assignments changed. None of these incidents rose to the level of a criminal charge being pursued for the alleged inmate aggressor.

The evidence collected for this provision shows that the agency has procedures in place to inform alleged inmate victims when the alleged inmate sexual perpetrator's criminal circumstances change due to the sexual abuse allegation. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.73 Provision (e)(f)

TDCJ Safe Prisons/PREA Plan states in part that; "All offender notifications or attempted notifications described in items 4-6 of this section shall be documented. The requirement to provide offender notification shall terminate if the offender is released from the custody of the TDCJ."

The Auditor reviewed 9 administrative investigative files. Of those files reviewed at the end of the on-site audit, all 9 cases contained documentation of the investigative findings and notification being made to the alleged inmate victim.

	<p>The evidence collected for this provision shows that the agency has procedures in place to ensure all notifications and attempted notifications are documented. Therefore, through written policy and document review, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring reporting to inmates.</p>
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115.76	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Executive Directive PD-22 (Rules of Conduct & Disciplinary Actions) <p>Observations made during the on-site audit and document review.</p> <p>115.76 Provision (a)(b)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “Disciplinary actions related to staff-on-offender sexual abuse or sexual harassment violations shall be handled in accordance with PD-22, “General Rules of Conduct and Disciplinary Action Guidelines for Employees”. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.”</p> <p>The facility reported one instance where a support staff member violated the Safe Prisons/PREA policy and resigned in lieu of termination. The Auditor reviewed 9 administrative investigative files during the document review. There was evidence of one substantiated allegation involving a support staff member.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure staff will be subject to disciplinary actions for violating the agency’s sexual abuse and sexual harassment policies to ensure that termination should be the presumptive disciplinary action for staff who have engaged in sexual abuse. Therefore, through written policy and document review the facility has demonstrated that it meets these provisions.</p> <p>115.76 Provision (c)</p>

TDCJ Safe Prisons/PREA Plan states in part that; “Disciplinary sanctions for violations of TDCJ policies relating to sexual abuse or sexual harassment, which do not involve actual 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.”

The facility reported one incident where staff resigned in lieu of termination for PREA related allegations associated with violating the agency’s policies relating to sexual abuse or sexual harassment other than engaging sexual abuse or sexual harassment during this rating period. The document review of the administrative files conducted by the Auditor confirmed this statement.

The evidence collected for this provision shows that the agency has procedures in place to discipline staff who violate sexual abuse or sexual harassment policies, but do not engage in sexual abuse. Therefore, through written policy and document review the facility has demonstrated that it meets this provision.

115.76 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; “All terminations for violations of TDCJ sexual abuse or sexual harassment policies, or resignations in lieu of termination, shall be reported to the OIG, unless the activity was clearly not criminal, and to any relevant licensing bodies.”

The Stevenson Unit reported that one staff member had resigned in lieu of termination for PREA policy violations. The investigation was conducted by the OIG Investigator and therefore the law enforcement agency was aware of the incident, and if appropriate, the OIG would contact any relevant licensing bodies. The review of the administrative files by the Auditor confirmed this statement.

The evidence collected for this provision shows that the agency has procedures to contact law enforcement and licensing bodies when a staff member is terminated or resigns due to an alleged violation of the agency’s sexual abuse or sexual harassment policies. Therefore, through written policy and document review, the facility has demonstrated that it meets this provision.

Conclusion:

Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring disciplinary sanctions for staff.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:

Documents:

- a) TDCJ Safe Prisons/PREA Plan
- b) TDCJ Executive Directive PD-29 (Sexual Misconduct with Inmates)

Interviews:

- 1) Interview with the Warden

Observations made during the on-site audit and document review.

115.77 Provision (a)

TDCJ Safe Prisons/PREA Plan states in part that; "Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with offenders and shall be reported to applicable law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies."

The facility has reported that there have been no PREA allegations involving contractors or volunteers violating the agency's sexual abuse or sexual harassment policies during this audit period. During the file review, the Auditor examined the administrative investigation files and confirmed this statement.

The evidence collected for this provision shows that the agency has procedures in place to ensure volunteers or contractors who engage in sexual abuse do not have contact with inmates. Therefore, through written policy and document review the facility has demonstrated that it meets this provision.

115.77 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "The unit shall take appropriate remedial measures, and shall consider whether to prohibit further contact with offenders, in the case of any other violation of TDCJ sexual abuse or sexual harassment policies by a contractor or volunteer."

The facility has reported that there have been no substantiated cases involving contractors or volunteers violating the agency's sexual abuse or sexual harassment policies. Also, no volunteer or contractor has been restricted from contact with inmates based on PREA violations during this audit period.

The Auditor interviewed the Warden, and he indicated that if a contractor or volunteer were accused of violating the agency's sexual abuse or sexual harassment policy then that individual would be banned from coming to the facility, or any facility, until the investigation was complete. If it were determined that the allegation was substantiated, the contractor or volunteer would no longer have access to the facility and the OIG is responsible for contacting any responsible licensing bodies.

	<p>The evidence collected for this provision shows that the agency has procedures in place to address actions to be taken when a contractor or volunteer violates the agency’s PREA policies but does not engage in the sexual abuse of an inmate. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard.</p>
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115.78	Disciplinary sanctions for inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Executive Directive ED-03.76 (Offender Disciplinary Procedures) c) TDCJ Disciplinary Rules & Procedures for Offenders in English and Spanish <p>Interviews:</p> <ul style="list-style-type: none"> 1) Interview with the Warden 2) Medical & Mental Health Staff <p>Observations made during the on-site audit and document review.</p> <p>115.78 Provision (a)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “Offenders shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the offender engaged in offender-on-offender sexual abuse, sexual harassment, extortion, substantiated acts of violence, or following a criminal finding of guilt for offender-on-offender sexual abuse in accordance with the TDCJ Disciplinary Rules and Procedures for Offenders.”</p> <p>The facility has reported that there have been no inmate-on-inmate sexual abuse incidents at the facility that were substantiated during this audit period.</p> <p>The evidence collected for this provision shows that the agency has procedures in</p>

place to ensure that inmates are subject to disciplinary sanctions following a finding that the inmate engaged in inmate-on-inmate sexual abuse. Therefore, through written policy and document review the facility has demonstrated that it meets this provision.

115.78 Provision (b)(c)

TDCJ Safe Prisons/PREA Plan states in part that; "Sanctions shall be appropriate to the nature of abuse committed, the offender's disciplinary history, and the sanction imposed for comparable offenses by other offenders with similar histories. The disciplinary process shall consider whether an offender's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed."

When conducting the interview with the Warden, he was asked what disciplinary sanctions inmates are subject to, following an investigation that found the inmate had engaged in inmate-on-inmate sexual abuse. In addition, is mental illness considered when determining sanctions? The Warden stated that the inmate could have loss of privileges, good time, criminal charges, and possibly be placed in a more restrictive housing unit. The Warden also stated that the mental illness part would be considered on the front in deciding if the inmate should be charged in the first place due to his disability.

The evidence collected for these provisions shows that the agency has procedures in place to discipline those inmates who have been found responsible for engaging in inmate-on-inmate sexual abuse. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets these provisions.

115.78 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; "If the unit offers therapy, counseling, or other interventions designed to address and correct possible underlying reasons or motivations for the abuse, consideration shall be made to determine if participation should be a requirement for access to programming or other benefits."

The Stevenson Unit reported in the Pre-Audit Questionnaire that the facility does provide therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for sexual abuse.

When conducting the interviews with the Medical & Mental Health practitioners they were asked if the facility offers therapy, counseling, or other intervention services designed to address and correct the underlying reasons for sexual abuse. The medical supervisor stated that she was unsure, and believed if it were offered, it would be available through the mental health services and not offered at the Stevenson Unit. The mental health professional stated that they offer mental health treatment. However, if they did have mental health concerns then the inmate would not be housed at the Stevenson Unit. However, if an incident occurred, she would interview both the alleged victim and alleged perpetrator. Both health professionals were asked

if these services require an inmate's participation as a condition of accessing programming and other benefits. The medical supervisor indicated that she did not think so, and that the issue would be handled by the mental health professionals. The mental health professional indicated that it would be strongly suggested but could not force any inmate to participate.

The evidence collected for this provision shows that the agency has procedures in place to provide therapy or counseling designed to address and correct reasons or motivations for sexual abuse. Therefore, through written policy and interviews conducted, the facility has demonstrated that it meets this provision.

115.78 Provision (e)

TDCJ Safe Prisons/PREA Plan states that, "An offender may be disciplined for sexual contact with staff only if it is determined the staff member did not consent to the contact."

The facility reported no incidents of this nature during this audit period.

The evidence collected for this provision shows that the agency has procedures in place to discipline those inmates who have engaged in sexual abuse against staff members. Therefore, through written policy and document review, the facility has demonstrated that it meets this provision.

115.78 Provision (f)

TDCJ Safe Prisons/PREA Plan states in part that; "A report of sexual abuse made in good faith, based on a reasonable belief that the alleged conduct occurred, shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. When the preponderance of evidence exists supporting a false allegation, the offender involved in the false allegation shall be disciplined in accordance with the TDCJ Disciplinary Rules and Procedures for Offenders."

The Stevenson Unit has reported no instances of inmates making false sexual abuse or sexual harassment allegations where they were disciplined for such action.

The evidence collected for this provision shows that the agency has procedures in place to prohibit those inmates that report sexual abuse or sexual harassment in good faith be disciplined regardless of the investigative findings. Therefore, through written policy and document review, the facility has demonstrated that it meets this provision.

115.78 Provision (g)

TDCJ Safe Prisons/PREA Plan states in part that; "Sexual misconduct between offenders is prohibited and shall result in disciplinary sanctions in accordance with the TDCJ Disciplinary Rules and Procedures for Offenders. However, sexual misconduct between offenders shall not constitute sexual abuse if it is determined the activity is consensual."

	<p>The evidence collected for this provision shows that the agency has procedures in place to prohibit any type of sexual activity between inmates and will discipline inmates for those activities. However, sexual misconduct shall not constitute sexual abuse if it is determined to be consensual. Therefore, through written policy and document review, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring disciplinary sanction for inmates.</p>
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115.81	Medical and mental health screenings; history of sexual abuse
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) Correctional Managed Health Care (CMHC) Policy E-35.1 (Mental Health Appraisal) c) CMHC Policy E-35.2 (Mental Health Evaluation) d) CMHC Policy G-57.1 (Sexual Assault) e) CMHC Policy H-61.1 (Confidentiality and Release of Information) f) Safe Prisons/PREA Automated Network Systems Assessments (SPPANS) g) PREA Mental Health Clinician Follow-up notes and Classification Assessment forms <p>Interviews:</p> <ul style="list-style-type: none"> 1) Interview with Staff Responsible for Risk Screening 2) Interviews with Medical & Mental Health Staff 3) Interviews with Inmates who disclose Sexual Victimization during Risk Screening <p>Observations made during the on-site audit and document review.</p> <p>115.81 Provision (a)</p>

TDCJ Safe Prisons/PREA Plan states in part that; "If the screening pursuant to this section indicates an offender has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure the offender is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening."

The Auditor interviewed six inmates that reported prior sexual victimization. Four inmates reported that mental health services were offered at the time of the risk assessment but declined and mental health assistance. One inmate stated that he did accept the assistance, and the qualified mental health professional (QMHP) met with him within two weeks. The last inmate indicated that he was not a victim of any sexual abuse. The facility did provide risk screening forms, which is part of the SPPANS system, where the inmate who reported prior sexual abuse and the classification officer can make comments documenting the notification of mental health professionals for a follow-up meeting. In addition, the facility provided evidence in the OAS of the Correctional Managed Health Nursing Clinic Notes documenting the 14-day follow-up meeting. The facility reported that 35 inmates reported prior sexual victimization in the last twelve months at the Stevenson Unit.

When conducting the interview with the staff member who is responsible for risk screening, she stated that if an inmate discloses prior sexual victimization during the risk screening process, then that information is documented on the assessment. If a meeting is accepted by the inmate, then that too is documented into the SPPANS automated system and sent to a QMHP.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report prior sexual victimization are offered a follow-up meeting with medical or mental health professionals within 14 days of intake. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it does meet this provision.

115.81 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "If the screening pursuant to this section indicates an offender has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure the offender is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening."

When conducting the interview with the staff member who is responsible for risk screening, she stated that if an inmate reports perpetrating prior sexual abuse during the risk screening process, a follow-up meeting with a QMHP would occur right away. The facility reported four instances during the last twelve-month period where an inmate disclosed perpetrating prior sexual abuse during the screening process. The QMHP was also asked if during a risk screening, an inmate indicates that they have previously perpetrated sexual abuse, is a follow-up meeting offered. The mental health professional confirmed that it is and would occur within 14 days.

The evidence collected for this provision shows that the agency has procedures in

place to ensure that inmates that have perpetrated sexual abuse are offered a follow-up meeting with mental health professionals within 14 days of intake. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it does meet this provision.

115.81 Provision (d)

TDCJ Safe Prisons/PREA Plan states in part that; “Any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, assisting with making treatment plans and informed management decisions, including those related to housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local law.”

The evidence collected for this provision shows that the agency has procedures in place to ensure that reported sexual victimization that occurred in a confinement setting is strictly limited to selected professionals. Therefore, through written policy and document review, the facility has demonstrated that it meets this provision.

115.81 Provision (e)

TDCJ Safe Prisons/PREA Plan states in part that; “In accordance with CMHC policies, medical and mental health practitioners shall obtain informed consent from offenders before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the offender is under the age of 18.” In addition, CMHC Policy puts procedures in place outlining the requirements for proper disclosure of inmate protected health information (PHI). This policy also defines the appropriate procedures for an inmate or former inmate to obtain access to their own medical record information.

The medical and mental health professionals were asked if they obtain informed consent from inmates before reporting about prior sexual victimization. In addition, both were asked how they would handle inmates under the age of 18 years old. The medical supervisor stated that they would ask for consent and document that on the agency’s “Authorization for the use of and Disclosure of Protected Health Information.” The medical supervisor also stated that the Stevenson Unit doesn’t house juveniles and therefore never experienced that situation. However, if she was made aware of that particular situation involving a vulnerable adult, then she would contact Texas Adult Protective Services. The QMHP also stated that no juveniles are housed in Stevenson Unit, but did mention that she has a duty to report because of the Texas mandatory reporting laws and would contact Child Protective Services.

The evidence collected for this provision shows that the agency has procedures in place to ensure informed consent is obtained from inmates before medical and mental health staff can report those incidents if the sexual victimization does not occur in a confinement setting. Therefore, through written policy and interviews conducted the facility has demonstrated that it meets this provision.

Conclusion:

	Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring a medical and mental health screening, history of sexual abuse.
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115.82	Access to emergency medical and mental health services
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) CMHC Medical Nursing Notes c) CMHC Policy G-57.1 (Sexual Assault) <p>Interviews:</p> <ul style="list-style-type: none"> 1. Interview with Staff Responsible for Risk Screening 2. Interviews with Medical & Mental Health Staff 3. Interview with Staff First Responder <p>Observations made during the on-site audit and document review.</p> <p>115.82 Provision (a)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; "Offender victims of sexual abuse shall 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 in accordance with CMHC policies."</p> <p>The Medical and Mental Health professionals were interviewed and asked if inmate victims of sexual abuse receive immediate and unimpeded emergency medical care and both professionals answered that they do. In addition, the medical supervisor stated that the nature and scope of the treatment is at the discretion of the attending physician at the emergency room. However, the medical supervisor's responsibility is the continuity of care and to follow all the physician's orders. The QMHP stated that she determines the level of care required and that mental health services are available if needed in emergency situations.</p> <p>The two inmates interviewed that reported sexual abuse were asked if medical or</p>

mental health services were offered at the time of the sexual abuse allegation. Both inmates indicated that they were offered medical and mental health services.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report prior sexual victimization 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. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.

115.82 Provision (b)

TDCJ Safe Prisons/PREA Plan states in part that; "If no qualified medical or mental health practitioners are on duty at the time a report of abuse is made, staff first responders shall take preliminary steps to protect the victim and immediately notify the appropriate on-call medical and mental health practitioners."

When the Auditor spoke with the USPPM, she advised the Auditor that nursing staff is available from 3:00 am to 5:30 pm. If necessary, The Stevenson Unit would utilize the services of Telemedicine or Digital Medical Services for non-emergency situations after hours. Therefore, medical attention is always available at the Stevenson Unit.

Interviews were conducted with 12 random staff, and of those staff interviewed, all 12 staff members stated that they would immediately remove the inmate from the situation or housing unit. When interviewing a first responder he explained that he would make the scene safe, report to a supervisor, preserve evidence, contact medical personnel, write a report, and protect the crime scene.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report sexual abuse are offered immediate medical and mental health services when no qualified medical and mental health personnel is available. Therefore, through policy and interviews conducted the facility has demonstrated that it meets this provision.

115.82 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders who become victims of sexual abuse while incarcerated shall be offered timely information about and access to emergency contraception and sexually transmitted infections prophylaxis, according to professionally accepted standards of care, where medically appropriate, in accordance with CMHC policies.

The Stevenson Unit utilizes the services of multiple Regional Hospitals such as Victoria, San Antonio, and Corpus Christi where the services of the Texas Forensic Nurse Examiners (TxFNE) provide these services. The interview with the SANE Nurse specifically outlined that the TxFNE will offer information, timely access to emergency contraception, and sexually transmitted infections prophylaxis.

When conducting interviews with medical and mental health staff it was indicated

	<p>that, “Yes, the SANE Nurse at the Regional Hospital would offer those services.”</p> <p>The Stevenson Unit reported no instances during this audit period that required a medical forensic examination.</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates are offered information and access to emergency contraception and sexually transmitted infections prophylaxis after allegations of sexual abuse. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets this provision.</p> <p>115.82 Provision (d)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “Treatment services shall be provided to the offender victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising from the incident.”</p> <p>The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that report sexual abuse do not incur any financial responsibility due to a sexual abuse allegation. Therefore, through written policy the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring access to emergency medical and mental health services.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) Correctional Managed Health Care (CMHC) G-57.1 (Sexual Assault) c) CMHC Policy E-44.1 Continuity of Care d) CMHC Policy E-35.2 Mental Health Appraisal <p>Interviews:</p>

1) Interviews with Medical & Mental Health Staff

Observations made during the on-site audit and document review.

115.83 Provision (a) & (b)

TDCJ Safe Prisons/PREA Plan states in part that; "All offenders who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile unit shall be offered medical and mental health evaluation and treatment, as appropriate. The evaluation and treatment of such offender victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in other units in accordance with CMHC policies or their release from custody."

The interviews conducted revealed that medical staff would not take the lead on treatment and would consult with the SANE Nurse or an attending physician. The medical supervisor stated that the treatment should be individualized based on the type of injury and that the nurse and attending doctor would determine that, and their job is the continuity of care. The mental health professional stated that it depended on how the interview would go to determine if the inmate is suffering from mental health needs.

The evidence collected for this provision shows that the agency has procedures in place to ensure the facility offer medical and mental health evaluation and treatment to all inmates who have been sexually victimized. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that it meets these provisions.

115.83 Provision (c)

TDCJ Safe Prisons/PREA Plan states that, "Offender victims shall be provided medical and mental health services consistent with the community level of care."

TDCJ employs medical and mental health professionals that must be licensed and registered to practice in the state of Texas. These licenses must be maintained to continue employment. For the purpose of this standard, both the medical supervisor and the QMHP stated that, "Yes, the services offered are consistent with those in the community." Both the medical and mental health services provided by the Stevenson Unit are consistent with the community level of care.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates receive medical and mental health services consistent with the community level of care. Therefore, through interviews conducted the facility has demonstrated that it meets this provision.

115.83 Provision (d) & (e)

TDCJ Safe Prisons/PREA Plan states in part that; "Offenders who have the capacity to become pregnant as a result of sexually abusive penile-vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from the conduct

described in this section, the victim shall receive timely and comprehensive information about and access to all lawful pregnancy-related medical services in accordance with CMHC policies.”

When conducting an interview with the medical supervisor, she replied that the Stevenson Unit is an all-male facility. In addition, the medical supervisor indicated that, “Yes, a positive pregnancy result from an inmate female victim would receive timely information about access to all lawful pregnancy related services and those services would be provided as soon as possible.”

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that are victims of vaginal penetration are offered pregnancy tests along with timely information about access to all lawful pregnancy-related medical services. However, the Stevenson Unit is an all-male facility. Therefore, through written policy, document review, and interviews conducted, the facility has demonstrated that this provision is not applicable.

115.83 Provisions (f) & (g)

TDCJ Safe Prisons/PREA Plan states in part that; “Offenders who become victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate and in accordance with CMHC policies.” The policy further states that, “Treatment services shall be provided to the offender victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising from the incident.”

Both inmates that reported sexual abuse stated that there was no financial costs associated with their allegations of sexual abuse.

The evidence collected for this provision shows that the agency has procedures in place to ensure that inmates that are victims of sexual abuse are offered tests for sexually transmitted infections as appropriate. Therefore, through written policy, the facility has demonstrated that it meets this provision.

115.83 Provision (h)

TDCJ Safe Prisons/PREA Plan states in part that; “A mental health evaluation of all known offender-on-offender abusers shall be attempted within 60 days of learning of the abuse and treatment shall be offered when deemed appropriate in accordance with CMHC policies.”

During the interview with the QMHP, she was asked if they would conduct an interview with all inmate-on-inmate abusers and offer treatment if appropriate. Also, when would these interviews be conducted. The QMHP indicated that, “Yes, interviews would be conducted, and they would more than likely occur as soon as possible.” The medical supervisor was interviewed and stated that this responsibility would fall on the mental health staff.

The evidence collected for this provision shows that the agency has procedures in place to attempt to conduct a mental health evaluation of all known inmate-on-

	<p>inmate abusers within 60 days of learning such abuse history. Therefore, through written policy the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring ongoing medical and mental health care for sexual abuse victims and abusers.</p>
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115.86	Sexual abuse incident reviews
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The PREA Auditor gathered, analyzed, and retained the following evidence related to this standard:</p> <p>Documents:</p> <ul style="list-style-type: none"> a) TDCJ Safe Prisons/PREA Plan b) TDCJ Administrative Directive AD-02.15 (Operations of Emergency Action Center) c) Four Stevenson Unit PREA Incident Review Reports <p>Interviews:</p> <ul style="list-style-type: none"> 1) Interview with the Warden 2) Interview with the PREA Coordinator (USPPM) 3) Interview with the Incident Review Team Member <p>Observations made during the on-site audit and document review.</p> <p>115.86 Provision (a) & (b)</p> <p>TDCJ Safe Prisons/PREA Plan states in part that; “An administrative review shall be completed for all alleged sexual abuse and staff sexual harassment incidents, unless determined unfounded. The unit warden shall obtain input from security supervisors, investigators, and medical or mental health practitioners when completing the review. The review shall be conducted in accordance with AD-02.15, ‘Operations of the Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents.’”</p> <p>The Stevenson Unit has reported 4 incidents of inmate sexual abuse requiring an Incident Review at the time of completing the PAQ. The facility has provided copies of</p>

those PREA Report of Incident Review forms. The forms list: who was in attendance, the date the review took place, summary of the incident, review of the considerations and factors, and any proposed action plan. In addition, the Auditor reviewed nine investigative files. All four Incident Reviews were present and reviewed by the Auditor. In addition, all four Incident Reviews occurred within the 30-day time period.

Recommendation: The Auditor is recommending that the agency add language to the Safe Prisons/PREA Plan that specifically addresses that the Incident Review ordinarily occur within 30 days of the conclusion of the investigation.

The evidence collected for these provisions shows that the agency has procedures in place to ensure that an incident review is conducted after every sexual abuse investigation excluding those that are unfounded. In addition, the incident review shall occur within 30 days of the conclusion of the investigation. Therefore, through written policy and document review, the facility has demonstrated that it meets this provision.

115.86 Provision (c)

TDCJ Safe Prisons/PREA Plan states in part that; “The review team shall include upper-level management, with input from line supervisors, investigators, and medical or mental health practitioners.”

The four PREA Incident Review documents examined by the Auditor listed multiple occupational authorities such as the Warden, Major, Captain, USPPM, Investigator, and medical.

In the interview with the Warden, he was asked who is part of the sexual abuse incident review team? The Warden stated that the team is made up of the Warden, Assistant Warden, USPPM, medical staff, and classification.

The evidence collected for this provision shows that the agency has procedures in place to ensure that the review team is made up of upper-level management, supervisors, investigators, and medical/mental health staff. Therefore, through written policy, document review, and interviews conducted the facility has demonstrated that it meets this provision.

115.86 Provision (d) & (e)

TDCJ Safe Prisons/PREA Plan states in part that; “An administrative review shall be completed for all alleged sexual abuse and staff sexual harassment incidents, unless determined unfounded. The unit Warden shall obtain input from security supervisors, investigators, and medical or mental health practitioners when completing the review.” The policy further states that, “The unit shall implement recommendations that result from the review or document the reasons for not doing so.”

The Stevenson Unit utilizes the TDCJ Safe Prisons/PREA Automated Network System (SPPAN) to conduct their Incident Reviews. A form within the system that must be completed when appropriate named the SPPANS Incident Review. This form requires the team to answer the following questions:

- a) Is there a deficiency in policy that needs to be addressed or changed?
- b) Did everyone involved understand the policy?
- c) Should there be some training on the policy?
- d) Does the everyday practice match the written policy?
- e) Is the everyday practice an example of good correctional practices?
- f) Is there some change in policy or training needed to assure that best practices are followed?
- g) Was the incident motivated by any factors, including but not limited to race, ethnicity, gender identification (such as LGBTI), gang affiliation, inmate culture, staff culture, or any other dynamic within the facility?
- h) After examining the area(s) where the incident occurred, is there something specific that contributed to the opportunity for the incident to occur.
 - i) Are there blind spots?
 - j) Is there insufficient key control?
 - k) Is security staff supervision in the area effective?
 - l) Are there procedures that affect the vulnerability of this area?
 - m) Were staff or inmates allowed in the area when they should not be?
 - n) Was there sufficient staff on duty to properly assure the prevention of sexual abuse?
 - o) Has the agency considered any recent changes to post assignments or staffing levels?
 - p) Is there technology monitoring the area?
 - q) Other factors?

The Sexual Abuse Incident Review documents that were reviewed by the Auditor has those factors listed on the form to specifically discuss the six topics listed in this provision. In addition, the files reviewed by the Auditor contained areas for recommendations on all the above topics.

Interviews with the Warden, Incident Review Team Member, and USPPM all revealed that these topics are considered and discussed during the review. The facility forwards all incident review documentation to the Safe Prisons/PREA Manager for review.

The evidence collected for this provision shows that the agency has procedures in

	<p>place to ensure that the incident review team considers all the above listed criteria when convening their meetings. Therefore, through written policy, and interviews conducted, the facility has demonstrated that it meets this provision.</p> <p>Conclusion:</p> <p>Based upon the review and analysis of all the available evidence, the PREA Auditor has determined that the facility is fully compliant with this standard requiring sexual abuse incident reviews.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. Policy and Document Review 2. Pre-Audit Questionnaire 3. TDCJ Safe Prisons/PREA Plan 4. TDCJ Website Review 5. Specialty Staff Interview Notes <p>The Agency has established policies that address all provisions of this standard. The Agency utilizes the Sexual Assault Report, which is a data collection instrument utilized to collect all sexual abuse data. The tracking system contains information on all allegations of abuse, neglect and exploitation, and all serious incidents. One of the functions of the PREA Compliance Manager is to maintain this information. The data is also collected from all contracted facilities. The Agency collects accurate and uniform data for every allegation of sexual abuse at facilities under its direct control by using a standardized instrument and set of definitions, as evidenced by policy and the report sample. The Agency aggregates the incident-based sexual abuse data at least annually, as evidenced by the annual PREA report and website review.</p> <p>Incident-based data collected includes the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice, as evidenced by policy and website posted data. The facility maintains, reviews, and collects data as needed from all available incident-based documents. This includes reports, investigation files, and sexual abuse incident reviews, as evidenced by policy and website posted data. A review of the Agency website reflects the comprehensive report is published and available to the public for all serious incidents to include sexual abuse and sexual harassment allegations. Compliance was further confirmed through review of completed data collection</p>

	<p>instruments and an interview with the PREA Ombudsman.</p> <p>After a careful and detailed review of all the information, the Auditor determined the Agency meets the requirements of this standard.</p> <p>The Texas Department of Criminal Justice performed an agency PREA audit that was finalized and received on November 21, 2024, in the form of a Final PREA Audit Report. In addition, the TDCJ completed a prior agency PREA audit in September 2023. In both cases, the agency was found to have been in compliance with Standard 115.87 by the PREA Auditor and a determination of “meets the standard” as the overall determination. This facility (Stevenson Unit) strictly follows the policies, procedures, and protocols established and instituted by the TDCJ.</p>
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115.88	Data review for corrective action
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. Policy and Document Review 2. Pre-Audit Questionnaire 3. TDCJ Safe Prisons/PREA Plan 4. TDCJ Website Review 5. Specialty Staff Interview Notes <p>The Agency has policies in place that address all provisions of the standard. As evidenced by the survey of sexual violence reports, annual PREA reports, and interviews with the Agency Head Designee and the PREA Ombudsman the agency reviews all 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. This includes including by: Identifying problem areas; Taking corrective action on an ongoing basis; and preparing a semi-annual report of its findings and corrective actions for each unit/facility, and the Agency. The report includes a comparison of the current year’s data and corrective actions with those from prior years and provides an assessment of the agency’s progress in addressing sexual abuse. The PREA Ombudsman’s Office is responsible for the oversight of the reporting process. The Agency’s report is approved by the Agency Head Designee and Executive Management Team and made readily available to the public through the agency TDCJ website. These tasks are initiated by the Unit Safe Prisons PREA Manager by submitting monthly reports to the Safe Prisons PREA Management Office. The Auditor verified this process of data collection through extensive interviews with the Agency Head Designee and the PREA Ombudsman.</p>

	<p>The Agency does redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but must indicate the nature of the material redacted, as evidenced by semi-annual PREA reports on the website and the interview with the PREA Ombudsman.</p> <p>After a careful and detailed review of all the information, the Auditor determined the Agency meets the requirements of this standard.</p> <p>The Texas Department of Criminal Justice performed an agency PREA audit that was finalized and received on November 21, 2024, in the form of a Final PREA Audit Report. In addition, the TDCJ completed a prior agency PREA audit in September 2023. In both cases, the agency was found to have been in compliance with Standard 115.88 by the PREA Auditor and a determination of “meets the standard” as the overall determination. This facility (Stevenson Unit) strictly follows the policies, procedures, and protocols established and instituted by the TDCJ.</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon to make Compliance Determination:</p> <ol style="list-style-type: none"> 1. Policy and Document Review 2. Pre-Audit Questionnaire 3. TDCJ Safe Prisons/PREA Plan 4. TDCJ Website Review 5. Specialty Staff Interview Notes <p>The Agency has a policy in place that addresses the provisions of this standard. The Auditor found that the Agency digitally and securely retains all data collected and this data is available to the public through the Texas Department of Criminal Justice website. The annual reports from previous years-to present are published on the website. Staff interviewed reported access to any data is restricted to the Agency Senior Staff for operational use and is password protected. All personal identifiers have been removed from the reports. The data and records collected are to be retained in accordance with state and agency retention requirements and for a minimum of 10 years. The PREA Ombudsman interview and review of the annual reports further confirmed this procedure.</p> <p>After a careful and detailed review of all the information, the Auditor determined the Agency meets the requirements of this standard.</p> <p>The Texas Department of Criminal Justice performed an agency PREA audit that was</p>

	<p>finalized and received on November 21, 2024, in the form of a Final PREA Audit Report. In addition, the TDCJ completed a prior agency PREA audit in September 2023. In both cases, the agency was found to have been in compliance with Standard 115.89 by the PREA Auditor and a determination of “meets the standard” as the overall determination. This facility (Stevenson Unit) strictly follows the policies, procedures, and protocols established and instituted by the TDCJ.</p>
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115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>This is the Stevenson Unit’s fourth PREA Audit. The initial audit was conducted in December of 2015. In 2021, the facility met 38 PREA standards, exceeded 7 standards, and 0 standards were not applicable. Each facility under the direct control of the Texas Department of Criminal Justice had been audited at least once during the previous three-year audit cycle. During the previous three-year audit cycle, the Texas Department of Criminal Justice ensured that at least one-third of its facilities were audited each year. This is the first year of this audit cycle.</p> <p>The Auditor was given full access to and observed all areas of the facility without obstruction. The Auditor received all requested documents or copies of relevant materials. The Auditor was also permitted to conduct all interviews in a private setting with both inmates and staff. Finally, the inmates were permitted to send the Auditor confidential correspondence in the same manner that legal mail would be handled. This topic was discussed and documented prior to the audit. The Auditor did not receive any inmate correspondences during this PREA audit.</p>

115.403	Audit contents and findings
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The Stevenson Unit, which is a correctional facility, operated by the Texas Department of Criminal Justice has posted the facility’s last three PREA Auditor’s Summary Reports on their agency website. The agency publishes all facility PREA audits on their website and schedules one-third of their facilities to be PREA audited every three years. Therefore, evidence would suggest that this would happen once again after receiving the 2024 PREA audit final report for the Stevenson Unit.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	na
	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 privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b) Inmate reporting		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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