

PREA Facility Audit Report: Final

Name of Facility: Wilkin County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 08/15/2025

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: Lee Johnson	Date of Signature: 08/15/2025

AUDITOR INFORMATION	
Auditor name:	Johnson, Lee
Email:	preaauditmn@gmail.com
Start Date of On-Site Audit:	04/10/2025
End Date of On-Site Audit:	04/11/2025

FACILITY INFORMATION	
Facility name:	Wilkin County Jail
Facility physical address:	515 Dacotah Avenue , Breckenridge, Minnesota - 56520
Facility mailing address:	

Primary Contact

Name:	Aaron Wood
Email Address:	awood@wilkincounty.gov
Telephone Number:	218-643-1205

Warden/Jail Administrator/Sheriff/Director	
Name:	Aaron Wood
Email Address:	awood@wilkincounty.gov
Telephone Number:	8-643-1205

Facility PREA Compliance Manager	
Name:	
Email Address:	
Telephone Number:	

Facility Characteristics	
Designed facility capacity:	21
Current population of facility:	8
Average daily population for the past 12 months:	11
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both women/girls and men/boys
In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For	

definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	19 to 55
Facility security levels/inmate custody levels:	Minimum, Medium
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	9
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	0
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	1

AGENCY INFORMATION	
Name of agency:	Wilkin County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	515 Dacotah Avenue, Breckenridge, Minnesota - 56520
Mailing Address:	
Telephone number:	218-643-1205

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information

Name:	Aaron Wood	Email Address:	awood@wilkincounty.gov
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Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

0

Number of standards met:

45

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

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

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-04-10
2. End date of the onsite portion of the audit:	2025-04-11

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:	Someplace Safe Wilkin Office 110 5th St N, Breckenridge, MN 56520 218-643-3109

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	21
15. Average daily population for the past 12 months:	11
16. Number of inmate/resident/detainee housing units:	6
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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	7
25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	0

<p>31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>9</p>
<p>37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>1</p>

38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	<p>2</p>
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	<p>The auditor interviewed the only trained volunteer and the only two contracted medical staff.</p>
<h2>INTERVIEWS</h2>	
<h3>Inmate/Resident/Detainee Interviews</h3>	
<h4>Random Inmate/Resident/Detainee Interviews</h4>	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	<p>6</p>
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<p> <input type="checkbox"/> Age <input type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input checked="" type="checkbox"/> None </p>
If "None," explain:	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>

43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	<p>0</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>	
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	<p>0</p>
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>
<p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed.</p>

<p>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>The auditor requested to interview all seven inmates in custody, six interviews were completed. There were no barriers to completing the interviews of persons in custody, and interviews were conducted in a private location.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>58. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>7</p>
<p>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p> <input type="checkbox"/> Length of tenure in the facility <input type="checkbox"/> Shift assignment <input type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input checked="" type="checkbox"/> None </p>
<p>If "None," explain:</p>	<p>The auditor requested to interview all staff during the on-site audit, seven were completed. The auditor completed interviews on day shifts and night shifts during the on-site audit.</p>
<p>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>

<p>a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)</p>	<p><input type="checkbox"/> Too many staff declined to participate in interviews.</p> <p><input checked="" type="checkbox"/> Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles).</p> <p><input type="checkbox"/> Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews.</p> <p><input type="checkbox"/> Other</p>
<p>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The auditor requested to interview all staff during the on-site audit, seven were completed. The auditor completed interviews on day shifts and night shifts during the on-site audit.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>12</p>
<p>63. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

65. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
66. Were you able to interview the PREA Compliance Manager?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" 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)

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

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

	<input type="checkbox"/> Other
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	1
b. 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
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other

<p>70. Provide any additional comments regarding selecting or interviewing specialized staff.</p>	<p>The auditor was allowed full access from Wilkin County for the selection process and interviewing of specialized staff, contractors, and volunteers in a private setting.</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>71. 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>72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>75. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>The auditor was given full access to all areas in the Wilkin County Jail facility, all documentation, interviews of anyone requested, and monitoring equipment. The auditor observed no blind spots with their new camera system and body worn cameras were in constant use by staff. The auditor found no restrictions with tests of critical functions that include interpretation services, mail processing, private intake area for education and risk screening, and access to advocacy services off-site.</p>
<p>Documentation Sampling</p>	
<p>Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.</p>	
<p>77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>The auditor found no restrictions with accessing documentation from Wilkin County either in person or digitally. The Jail Administrator was timely and responsive with all document requests and explanations of procedures.</p>

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	0
a. Explain why you were unable to review any sexual abuse investigation files:	The auditor found no sexual abuse/ harassment complaints or investigations.

<p>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</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>89. 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>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>a. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>The auditor found no sexual abuse/harassment complaints or investigations.</p>
<p>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<p>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input 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 harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>The auditor found no sexual abuse/harassment complaints or investigations.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

- Yes
 No

Non-certified Support Staff

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

- Yes
 No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

- The audited facility or its parent agency
- My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)
- A third-party auditing entity (e.g., accreditation body, consulting firm)
- Other

Identify the name of the third-party auditing entity

West Central MGMT

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 facility meets this standard and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire • WCJ 612 PREA Policy (Issued 07/23/2024) • Jail Staff Roster 25 • Agency website • Interview with PREA Coordinator (Jail Administrator) • Interview with nine random staff <p>(a) Wilkin County Jail provided a copy of Policy 612 which was a detailed and comprehensive written policy on the Lexipol Custody policy manual. A review of the policies verified that the policies included all components outlined in this standard. The nine staff interviewed fully understood the Agency's Prison Rape Elimination Act (PREA) policy and the training they received in preventing, detecting, and responding</p>

	<p>to sexual abuse and harassment. Staff has been trained during their in-service training. The agency website publicly displays the zero tolerance policy and how allegations will be investigated in order to prevent, detect, and respond to sexual abuse and harassment.</p> <p>https://wilkincounty.gov</p> <p>(b) The Jail Administrator is the designated PREA Coordinator who reports directly to the Sheriff as the PREA Coordinator is the third in command for the agency upon reviewing the organizational chart. The Sheriff supports and the PREA Coordinator reported having sufficient time and authority to develop, implement, and oversee Agency efforts to comply with the PREA standards. The PREA Coordinator has been in this position for 3 years and when nine staff were interviewed, all explained the PREA Coordinator was the point of contact for PREA related issues.</p> <p>(c) Wilkin County operates one facility with a PREA Coordinator and a team of two other senior staff are tasked with PREA compliance duties overseen by the 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
	Wilkin County does not contract with other agencies for the confinement of their inmates, nor have they ever. However, the Agency is looking to do future contracts to confine other agency inmates.

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Staffing Plan 25 • Minnesota Department of Corrections (MN DOC) Inspection report (Completed 08/01/2024) • Interview with Jail Administrator

	<ul style="list-style-type: none"> • Interview with Intermediate- or Higher-Level Facility Staff • Interview with nine random staff • Facility on-site review observations • Observation of recorded video of unannounced rounds • Review of annual performance evaluations <p>(a) The agency reported an average daily population of 9 inmates and the facility staffing plan is based on 21 inmates, the licensed capacity approved by the Minnesota (MN) Department of Corrections (DOC) Inspections report. The staffing plan includes considerations outlined in paragraph (a) of this standard and is annually signed off by the Jail Administrator as required by the MN DOC. The staffing plan accounts for additional staff during weekend evening hours to account for more intakes, called the "power shift" which is staffed above minimum staffing levels according to their inmate counts.</p> <p>(b) The agency reports on the PAQ that there have not been any deviations from the staffing plan due to their staffing levels. Through facility site review observation and interviews with random staff and inmates, staffing levels have not been below minimum staffing for their inmate counts.</p> <p>(c) The facility showed through expense reports the new camera system installed in 2021 adding camera coverage in many areas to assist with supervision. A review of annual staff performance evaluations show the Jail Administrator has completed regular evaluations of staff with the assistance of human resources.</p> <p>(d) The facility Policy 612 requires the Jail Administrator or Lead Correctional Officer to conduct and document unannounced rounds. These unannounced rounds are to be completed randomly on day and night shifts, covering all posts. The Jail Administrator has it scheduled confidentially between the Jail Administrator and Lead Correctional Officer to be reminded when to complete and document unannounced rounds. These are completed with their body worn camera and marked for documentation purposes. Interviews with the Jail Administrator and Lead Correctional Officer in addition to the review of recorded video footage of unannounced rounds, the facility demonstrated compliance with this standard.</p>
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115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Wilkin County does not confine youthful inmates at this facility. All interviews, facility on-site review observations, and policy verified all youthful inmates are not housed at

	this facility as the PREA Coordinator disclosed all are transported to the Moorhead Juvenile Detention Center.
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115.15	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The facility meets this standard and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • WCJ 527 Searches (Issued 03/25/2025) • WCJ 1000 Inmate Programs and Services (Issued 07/23/2024) • WCJ 813 Inmate Hygiene (Issued 03/25/2025) • Interview with Intake staff • Interview with nine random staff • Interview with six inmates (seven total in custody) • Facility on-site review observations • Transgender Preference Form • Photographs of locker room door window slots <p>(a) Wilkin County policy states strip searches of inmates will be conducted in private by an officer of the same gender as the person being searched in the defined area marked on the floor, also observed during the on-site facility site review. Wilkin County policy states strip searches, or visual body cavity searches of cross gender inmates will only be conducted in exigent circumstances by medical staff, required to be documented and forwarded to the PREA Coordinator and cross-gender pat-down searches of female inmates will be documented by body worn cameras.</p> <p>(b) The facility reported zero pat-down searches of female inmates by male staff in the past twelve months. Informal conversations with inmates and staff confirmed it is not usual for male staff to pat search female inmates. Two female inmates interviewed denied ever being refused the opportunity to participate in activities with all six responded that a female staff member is always present and available.</p> <p>(c) Documentation provided in the pre-audit questionnaire included shift schedules, facility rosters, daily inmate population, and a weekly schedule that was provided during the on-site facility site review. The documentation provided and observations made during the facility site review were consistent with adequate male and female staffing for all shifts. The PREA Coordinator provided policy and training records of body worn cameras for staff showing that all staff are required to record all inmates interactions and have been trained with body camera operation during training.</p>

	<p>(d) Inmate movement was observed during the on-site visit throughout the facility and staff consistently made opposite gender announcements. Additionally, signage is placed outside all housing unit main doors for staff to observe as a reminder for announcing their presence. Interviews with six inmates of the total seven inmates in custody at the time of the on-site visit confirmed they have privacy while showering, changing clothes, or using the bathroom facilities. All six inmates confirmed staff of the opposite gender announce their presence prior to entering the housing unit. All areas where inmates may be in a state of undress, such as showering, using the toilet, and/or changing their clothes were observed with no restrictions of access.</p> <p>(e) At the time of the on-site visit, the facility did not have transgender/intersex inmates in custody, therefore, interviews for this targeted category were not conducted. The Sheriff, Jail Administrator, and nine random staff confirmed during their interviews that during the twelve months prior to the audit, the facility had no searches of transgender or intersex inmates for the sole purpose of determining the inmate's genital status.</p> <p>(f) During the on-site visit, training records observed showed adequate training curriculum provided to staff how to perform cross-gender pat-down searches and searches of transgender and intersex inmates. The training curriculum outlined the agency's policy on cross-gender pat-down searches and searches of transgender/intersex inmates, policy prohibits the search of inmates for the sole purpose of determining the inmate's genital status, and defines exigent circumstances. Training curriculum covers identifying gender at intake utilizing a transgender preference form and the use of medical to assist with determining an inmate's genital status.</p> <p>CORRECTIVE ACTION: During the on-site visit, an inadequate view of two door window slots in the locker room were in view of two regularly traveled hallways by staff and in view of another housing unit. The locker room is utilized for sentenced male and female work release inmates with only one inmate in the locker room at a time commonly in a state of undress. The Jail Administrator verified they have glass glazing to be used for these two door window slots to prevent cross gender viewing during the changing of clothes for work release inmates. During the post-audit period within a week after the on-site visit, the Jail Administrator provided picture verification that both window slots have been covered with the glass glaze for both window slots which adequately prevents cross gender viewing. This was observed during an additional on-site visit by the auditor.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility meets this standard, and the following evidence was relied upon in

	<p>making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 604 Inmates with Disabilities Policy (Issued 03/25/2025) • WCJ 506 Inmate Handbook and Orientation Policy (Issued 03/25/2025) • Interview with Agency Head • Interview with nine random staff • Interview with six inmates (seven total in custody) • Facility on-site review observations <p>(a) The Sheriff confirmed that there are procedures in place to provide inmates with disabilities and inmates who are limited English proficient (LEP) equal opportunities with PREA education and that Jail Administration has been progressive towards improvements in this area. The nine staff confirmed during interviews about the jail cell phone with Language Line interpreter service on 24 hour a day access. The auditor did call the Language Line and confirmed it was a live person and responsive to the needed language and confirmed the availability 24 hours a day.</p> <p>(b) Wilkin County issues each inmate a smart tablet device to keep in their possession throughout their incarceration. The device contains PREA information about prevention methods, confidentiality, ways to report, medical information, treatment and counseling, and the investigative process. Written and signed PREA acknowledgements and inmate handbook receipts are maintained within this electronic system.</p> <p>(c) The auditor could not find any indications where inmate interpreters were utilized. The Jail Administrator confirmed they do not use other inmates as they have 24-hour per day access with the Language Line. During the on-site portion of this audit, there were no inmates who met the criteria of this standard in custody.</p>
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115.17	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 308 Recruitment and Selection Policy (Issued 03/25/2025) • WCJ 320 Volunteers and Contractors Policy Randon (Issued 03/25/2025) • WCJ 113 Special Assignments Policy (Issued 03/25/2025) • Random selection of background checks • Interview with Agency Head

- Interview with Administrative Human Resources Staff
- Interview with Jail Administrator
- Facility on-site review observations

(a) The auditor confirmed that Policy 308 prohibits the hiring and promoting of staff, contractors, or volunteers who may have contact with inmates who have engaged in the prohibited conduct specified in this standard. Interviews with the Sheriff and Human Resources Staff also verified the agency does not hire or promote anyone who may have contact with inmates who have engaged in the prohibited conduct specified in this standard. The auditor reviewed a random sampling of staff, contractor, and volunteer files and found the timely and necessary background checks were completed.

(b) Interviews with the Jail Administrator and Human Resources Staff verified that the facility considers and investigates any sexual harassment incidents when deciding whether to hire, promote, or enlist any contractors and services. The auditor confirmed that Policy 308 also requires the consideration of any sexual harassment incidents in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

(c) Policy 308 requires criminal background record checks to be completed every five years on current employees, contractors, and volunteers who have contact with inmates. The Jail Administrator verified this was a new process in the last year prior to the on-site review and still had one more staff to complete during the auditor being on-site. Human Resource staff provided personnel files that contained background investigation reports which verified that thorough efforts were made to contact prior institutional employers for past employment history for sexual abuse allegations.

(d) The auditor reviewed completed background checks on contractors who may have contact with inmates prior to enlisting their services. This is required by Policy 320. It was acknowledged by the Jail Administrator that there was one remaining contract employee enlisted that required a background check during the auditor being on-site.

(e) The Jail Administrator confirmed a systematic process now in the background hiring phase for their agency that all background checks will be completed on new hires and every five years for existing staff saved on an electronic calendar. The auditor confirmed with the Jail Administrator that all staff are on the same year cycle to be completed being this was a new practice in the last year to satisfy PREA compliance requirements.

(f) The auditor confirmed with Human Resources Staff that all applicants are asked about previous sexual misconduct which is answered on the application. This is also completed during new hire and promotional processes during interviews now which is a new practice for the preparation of this PREA compliance requirements.

(g) The auditor verified with Policy 308 the agency shall ask all applicants who may have contact with inmates to disclose any conduct described above in written applications or interviews. Material omissions regarding such misconduct, or the

	<p>provision of materially false information, are grounds for termination.</p> <p>(h) The auditor confirmed with Human Resources Staff that all proper data release waivers will authorize the release of information of former staff of any allegations of sexual abuse or harassment. The auditor confirmed that all data would be released that is within the law. Human Resource Staff described that a signed written authorization allows for the release of disciplinary records and performance evaluations. There is a standard consent form as part of the background investigation process for incoming applicants to allow Wilkin County to obtain information from other agencies.</p> <p>CORRECTIVE ACTION: During the on-site visit, it was acknowledged by the Jail Administrator that there were two remaining background checks to be completed after the auditors on-site audit phase. The Jail Administrator verified they have scheduled the coordination to complete the background check fingerprint process. During the post-audit period within a month after the on-site review, the Jail Administrator provided picture verification that both background checks have been completed. The completed BCA Criminal background checks received were observed during an additional on-site visit by the auditor.</p>
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115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ - PLC and IO Upgrades - Proposal (07/24/2025) • WCJ - Intercom, video, and card access upgrades (07/12/2021) • Interview with Agency Head • Interview with Jail Administrator • Facility on-site review observations <p>(a) Wilkin County has not acquired a new facility nor made a substantial expansion or modification to existing facilities since the last PREA audit as this is their first audit cycle. The Sheriff and Jail Administrator both ensured that consideration is given to the agency’s ability to protect inmates from sexual abuse as part upgrades to the jail facility.</p> <p>(b) Wilkin County has updated their video monitoring system/electronic surveillance system and door control monitoring technology. Wilkin County completed upgrades in 2021 and 2024 with intercoms, cameras, and card access as detailed invoices were also provided. The Sheriff confirmed that monitoring technologies are used to enhance the protection of inmates from incidents of sexual abuse, especially since</p>

	<p>the upgrade prevented many blind spot areas where staff and inmates were not on camera view during normal work activity. The Jail Administrator verified a primary reason for monitoring technology updates is to improve upon inmate and staff protection where now they have a direct view of vulnerable inmates. During the on-site review, the auditor noted multiple newly designed cameras in all areas of the facility where inmates are housed and in work/program areas.</p>
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115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Someplace Safe MOU (Signed 03//25/2025) • Interview with nine random staff • Interview with SANE staff - CHI St. Francis Medical Center • Interview with six inmates (seven total in custody) • Interview with Jail Administrator • Facility on-site review observations <p>(a) Wilkin County is responsible for conducting administrative and criminal sexual abuse investigations. The Jail Administrator confirmed if there was a conflict of interest, a neighboring Sheriff’s Office would be referred to accomplish the investigation. When conducting the investigation, the agency investigators follow a uniform evidence protocol. The Jail Administrator explained what was utilized as uniform evidence protocols which would aid responders in obtaining usable physical evidence with their practices.</p> <p>(b) Policy 612 describes the uniform evidence protocol for sexual abuse investigations which would be appropriate for youth considering it follows the adopted “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents.” The Jail Administrator confirmed Wilkin County does not hold youthful inmates in the jail.</p> <p>(c) Wilkin County offers all inmates who experience sexual abuse access to forensic medical examinations. The examinations are offered without financial cost to the victim, and to the extent possible, are conducted by Sexual Assault Forensic Examiners (SAFE) or Sexual Assault Nurse Examiners (SANE). If a SAFE/SANE is not available, a qualified medical practitioner performs the examination. The Jail Administrator verified that the same process would be used for inmates at the local hospital with SANE staff like victims in the community using this service. The Jail Administrator said local advocacy Someplace Safe would be at the hospital for these</p>

	<p>assessments with inmates. Policy 612 confirms these examinations are done outside the facility at the local hospital and offered without financial cost to the inmate.</p> <p>(d) Wilkin County does make a victim advocate from a rape crisis center available in person or by other means, and these efforts are always documented as part of the investigative report. If for some reason a victim advocate would not be available, other arrangements would be made to provide a staff member from a community-based organization or a qualified agency staff member of the same sex. The auditor reviewed a signed agreement with Someplace Safe verifying both agencies services and responsibilities to victims of abuse. The Jail Administrator confirmed Someplace Safe has appropriate staffing and respond regularly to the local hospital when needed for incidents.</p> <p>(e) The Jail Administrator and Someplace Safe both confirmed that if requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals. The auditor did not speak with any inmates that utilized the advocacy services, although they were aware of it. The auditor verified these provisions of this standard are included in the signed agreement with Someplace Safe.</p> <p>(f) Wilkin County is responsible for conducting criminal and administrative sexual abuse investigations.</p> <p>(g) The auditor is not required to audit this provision.</p> <p>(h) Wilkin County would only use SANE staff at the local hospital for this provision which is confirmed by Policy 612.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Wilkin County Website • PREA Annual Report 23, 24 • Interview with Agency Head • Interview with Jail Administrator • Interview with Investigative Staff

	<p>(a) Wilkin County ensures that an administrative or criminal investigation is completed on all allegations of sexual abuse and sexual harassment. The Jail Administrator provided two reports of past inmate grievances that were not considered allegations sexual abuse or harassment for the purpose of this provision. Policy 612 verifies that allegations of sexual abuse and harassment are investigated. The Sheriff confirmed each and every allegation would be properly and timely investigated and would use an outside agency if needed.</p> <p>(b) Wilkin County has a policy that requires that allegations of sexual abuse/harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including its own agency as it conducts the investigations. The auditor noted that Wilkin County does publish the same policy language on its website to provide PREA information to the public. The Investigative staff confirmed that all referrals of allegations of sexual abuse/harassment are documented with an investigative report that include supplemental reports and attachments. Wilkin County has zero incidents of abuse or harassment for 2023 and 2024 posted on their public website.</p> <p>(c) Wilkin County is responsible for conducting criminal and administrative sexual abuse investigations.</p> <p>(d) Wilkin County is responsible for conducting criminal and administrative sexual abuse investigations.</p> <p>(e) The auditor is not required to audit this provision.</p>
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115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • PREA Training Acknowledgment Form (Created 04/2023) • Lexipol - Corrections One Training Overview • Spark PREA Training • MN DOC Con games Video • Random selection of staff training records • Interview with nine random staff • Interview with Jail Administrator <p>(a) Wilkin County trains all employees who may have contact with inmates on all the PREA elements as required in this standard. The correctional staff that were</p>

	<p>interviewed verified that they were trained during their regular in-service training. Some staff were newly hired and have recently completed the training online during the auditor’s on-site review. All staff were knowledgeable and understood the zero-tolerance policy and inmate protections from abuse. The auditor reviewed the training curriculum, 15 test questions, and signed off acknowledgements from staff.</p> <p>(b) Wilkin County is a co-ed facility; training is tailored to both gender inmates at the jail and includes a training process for transgender inmates on the use of their preference form and assistance with medical. Wilkin County does not reassign staff to another facilities or housing units.</p> <p>(c) Wilkin County completes annual refresher training for all staff during their in-service training which is done on a quarterly basis serving different work topics with PREA assigned a two-hour block. The Jail Administrator confirmed a video from the MN DOC is played with new hires outlining an inmate interview on how to avoid inappropriate relationships and to set professional boundaries with inmates.</p> <p>(d) Wilkin County has an acknowledgment of topics and understanding the material form that is signed and dated by each member of staff. Questions about the material are noted on the form to be addressed with Jail Administration.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • Spark PREA Training - Volunteers and Contractors • WCJ Volunteer Training Plan 2025 • WCSO PREA Contractor Orientation Packet • Random selection of volunteer and contractor training records • Interview with Volunteer • Interview with Medical and Mental Health Staff • Interview with Jail Administrator <p>(a) Wilkin County has one volunteer that regularly does programming with inmates in jail and two medical contractor that regularly meets with inmates. Both have completed the comprehensive training program through Spark Training titled “PREA for Volunteers and Contractors.” The auditor confirmed with both that they received PREA training and understood their role in keeping inmates safe and contacting the Jail Administrator if there were ever signs of sexual abuse or harassment. The auditor confirmed the training is within the policies and procedures for the jail and how to</p>

	<p>report any incidents.</p> <p>(b) Wilkin County supplied a Volunteer Training Plan which consists of quarterly topics that is done each year, to include the following: PREA for Volunteers and Contractors, Emergency Procedures, Evacuation Drill, and in person meeting to discuss personal and program development. This training covers zero-tolerance policy and how to report sexual abuse and harassment to Jail Administration.</p> <p>(c) Wilkin County documents the volunteer and contractor training within its WCSO PREA Contractor Orientation Packet which specifies that the volunteer or contractor has signed the acknowledgement of training received and they understand the material.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • Wilkin County Jail PREA Notice • Random selection of intake records • WCJ Inmate Handbook • WCJ PREA NOTICE 30-day Review • WCJ PREA Brochure for Inmates • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Intake Staff • Interview with six inmates (seven total in custody) • Facility on-site review observations <p>(a) Inmates at Wilkin County receive information at the time of intake about the zero-tolerance policy and how to report incidents of sexual abuse and harassment. In the past 12 months, Wilkin County booked 200 inmates into their facility and the PREA Notice of zero-tolerance is given at the booking process. The auditor was able to observe a booking process of an inmate in the same room and listening to the intake officer going through and explaining the PREA Notice of zero-tolerance to the inmate. This was being done in a private setting away from other inmates and the inmate digitally signs the form which verifies that they have been informed, educated, and understand the PREA Policy. The intake staff confirmed this is done at the most within 24 hours depending on the situation and status of the inmate, usually within hours of arriving at the jail. Inmates verified through formal interviews that they were booked into the jail and PREA Notice was covered with them within hours of arriving at the jail.</p>

(b) Of the 200 inmates that were booked into Wilkin County in the past 12 months, nine inmates were held for 30 days or more. The auditor reviewed the dates of all inmates that should have received comprehensive PREA education of their right to be free from sexual abuse/harassment and to be free from retaliation for reporting such incidents. Among the nine inmates, there were three inmates that were beyond the 30-day standard. When these records were discussed with the Jail Administrator for clarification, the auditor learned this 30-day comprehensive education practice began in October 2024 in preparation for the PREA audit and was solidified with procedure in February 2025 with staff trained.

(c) Wilkin County has an inmate PREA brochure that is given to all inmates, and all were educated by February 2025, which is their first audit cycle.

(d) Policy 612 confirms that inmate PREA education is available in accessible formats for all inmates including those who are deaf, visually impaired, disabled, limited reading skills, and LEP. Inmates who cannot read or are visually impaired, have intellectual, psychiatric or speech disabilities or limited reading skills, shall have the materials read to them by a staff member if a licensed translator is not available. Inmates who are deaf or hard-of-hearing are provided with interpretation services. Reasonable efforts are made by staff to assist the inmate in understanding the information.

(e) Wilkin County maintains documentation of inmate participation in PREA educational sessions as described in the 30-day PREA Notice Review which inmates digitally sign.

(f) Wilkin County ensures that PREA information is continuously and readily available or visible to inmates through posters, brochures, inmate handbooks, and other electronic formats which every inmate is given a tablet. The Language Line 24/7 access is accommodating with instant response for the use of staff having access to the jail cell phone.

CORRECTIVE ACTION: During the on-site visit, it was acknowledged by the Jail Administrator that inmates were not consistently receiving 30-day comprehensive education. It was determined to schedule an additional on-site visit with the auditor so additional inmates would enter the facility and require the 30-day comprehensive education so this standard could be verified as common practice. During the post-audit period within a couple months after the on-site review, the Jail Administrator confirmed there was data to be reviewed by the auditor. Once on-site, the auditor reviewed two inmate files that confirmed the 30-day comprehensive education was completed. The Jail Administrator explained and showed the auditor of the process of how intake staff will add this 30-day requirement to a shared calendar as an invite so staff can monitor which inmate requires without going beyond 30 days, which will email staff as an alert on their emails. The auditor confirmed the records and practice reviewed meets the standard.

	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • WCJ Investigative Staff Training Record • Interview with Investigative Staff • Interview with Jail Administrator • Facility on-site review observations <p>(a) Wilkin County Policy 612 requires that investigators are trained in conducting sexual abuse investigations in confinement settings. Training records were reviewed by the auditor as there is one investigator assigned for these types of investigations. The training curriculum was reviewed by the auditor which showed a National Institute of Corrections (NIC) (March 2025) training certificate. Through interviews, it was confirmed that training is received specific to conducting sexual abuse investigations in confinement settings. The investigator advised that they receive initial training and then intermittent training to keep current. This investigator has had over 25 years of experience in community-based investigations, however was very familiar with in custody investigations.</p> <p>(b) Wilkin County Policy 612 verified it requires the same specialized investigative training to include: techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative or prosecution referral.</p> <p>(c) Wilkin County maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. The auditor verified the certificate of completion.</p> <p>(d) The auditor is not required to audit this provision.</p>
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115.35	<p>Specialized training: Medical and mental health care</p> <hr/> <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p>
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	<ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • ACH – Medical Spark Training logs • Medical and Mental Care Standards PREA Training • Interview with Medical and Mental Health Staff • Facility on-site review observations <p>(a) Wilkin County verifies that medical vendor ACH ensures that all medical and mental health care practitioners who work regularly in its facilities have been trained in the following: how to detect and assess signs of sexual abuse/harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse/harassment, and how and who to report allegations or suspicions of sexual abuse/harassment. The auditor reviewed Policy 612 to ensure all the required elements of the standard are addressed. There are two medical and mental health staff that are contracted with ACH for regular services at Wilkin County and verified both completed the Spark PREA Training.</p> <p>(b) Medical staff at Wilkin County do not conduct forensic examinations as inmates would be transported to the local hospital to be performed by SAFE/SANE staff.</p> <p>(c) Medical and Mental Health staff at Wilkin County complete the online Spark PREA Training, which is held by employer ACH, the Volunteer/Contractor training documentation is held by Wilkin County.</p> <p>(d) Medical staff at Wilkin County complete the online Spark PREA Training, which is held by employer ACH, the Volunteer/Contractor training documentation is held by Wilkin County. This is for two ACH staff that have regular access to inmates in Wilkin County.</p>
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ PREA Adult Male Assessment • WCJ PREA Adult Female Assessment • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Risk Screening Staff • Interview with six inmates (seven total in custody) • Interview with Jail Administrator • Facility on-site review observations

(a) All inmates are assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. This is confirmed in Policy 612 and with interviews with Risk Screening Staff. The auditor was able to observe a booking process with an inmate that Risk Screening Staff completed the risk screening on their Adult Male Assessment form. The process was in a private setting away from other inmates and questions are asked of the inmate as well as the officer's perception of the inmate. The staff was not in a hurry and asked questions in a calm and professional manner that caused a positive interaction with the inmate. During formal interviews with inmates, all confirmed PREA questions were asked about risk assessment within this standard.

(b) Policy 612 confirms the screening for risk of victimization and abusiveness standard requires that the screening ordinarily takes place within 72 hours of arrival at the facility. In the past 12 months, there were 43 inmates whose length of stay in the facility was for 72 hours or more. The auditor reviewed a random selection of 19 inmate risk assessments of all inmates that should have received this risk assessment. Among the 19 files reviewed, there were three inmates beyond the 72-hour standard which was not out of the ordinary timeframe. When these records were discussed with the Jail Administrator for clarification, the auditor learned this 72-hour risk screening practice began in October 2024 in preparation for the PREA audit and was solidified with procedure in February 2025 with staff trained.

(c) Wilkin County uses a screening tool that is fact-based inmate demographics, observations, responses from inmates, staff perception, past incarceration, and criminal history. The auditor finds the screening tool and the process for collecting information to be unbiased and impartial. Policy 612 confirms an objective screening tool must be utilized.

(d) Wilkin County does include all 10 criteria required of the Screening for Risk of Sexual Victimization and Abusiveness are included and considered on the intake risk screening forms. Interviews with Risk Screening Staff were able to explain what the initial risk screening considers and described the process for conducting the initial screening and why the score is used for housing purposes.

(e) Wilkin County considers prior acts of sexual abuse, prior convictions or violent offenses, and history of prior institutional violence or sexual abuse in assessing inmates for the risk of being sexually abusive. Interviews with Risk Screening Staff explained the housing options for inmates with high risk of being sexually abusive and to house with inmates at risk of being abused.

(f) Policy 612 confirms Wilkin County requires reassessment of each inmate's risk of victimization or abusiveness within 30 days of the inmate's arrival or based upon additional relevant information by the facility since the intake screening. In the past 12 months, eight inmates have been reassessed for this standard. The auditor reviewed records of reassessment for risk of sexual victimization or abusiveness, in addition to the records of inmates who were reassessed for the risk of victimization or abusiveness. A spot check of those records confirmed that Wilkin County follows this standard requirement.

(g) Policy 612 confirms Wilkin County requires reassessment of each inmate when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate’s risk of sexual victimization or abusiveness. The Jail Administrator explained this would happen at any time there is a change in behavior trends that may lead to a change in an inmate’s risk level.

(h) Policy 612 prohibits disciplining inmates for refusing to answer questions regarding the following: whether the inmate has a mental, physical, or developmental disability, whether or not the inmate is or is perceived to be LGBTQI or gender non-conforming, whether or not the inmate has previously experienced sexual victimization, and the inmate’s own perception of vulnerability. The formal interview with the Risk Screening Staff explained this process thoroughly and they will explain to the inmate the reasons for gathering the information to appease any refusal.

(i) Wilkin County implements appropriate controls on the dissemination of responses to questions asked pursuant to this standard to ensure that sensitive information is not exploited. All interviews were consistent with the information from the two risk screening staff who will turn in the data to the Jail Administrator as it is filed in their office. During the on-site review, the auditor reviewed this process and confirmed the filing of the data with the Jail Administrator.

CORRECTIVE ACTION: During the on-site visit, it was acknowledged by the Jail Administrator that inmates were not consistently receiving 72-hour risk assessments. It was determined to schedule an additional on-site visit with the auditor so additional inmates risk assessments within this standard could be verified as common practice. During the post-audit period within a couple months after the on-site review, the Jail Administrator confirmed there was data to be reviewed by the auditor. Once on-site, the auditor reviewed multiple risk assessments which were completed same day of intake. The Jail Administrator explained there are two designated senior staff who are assigned to ensure all inmates will be screened for risk assessments within 72 hours of arrival at the facility. They each work opposite shifts so it will cover all time frames to complete this standard as the risk screening process takes place almost immediately to a few hours in custody and certainly will be under 24 hours due to opposite shift coverage. The auditor confirmed the records and practice reviewed meets the standard.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ)

- Transgender Questionnaire
- WCJ 612 PREA Policy (Issued 07/23/2024)
- Interview with Jail Administrator
- Interview with Risk Screening Staff
- Interview with six inmates (seven total in custody)
- Facility on-site review observations

(a) Wilkin County uses information from the risk screening to inform housing, bed, work, education, and programming assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those inmates at high risk of being sexually abusive. The Jail Administrator confirmed that once a risk assessment score is found, other inmates scores can be assessed in order to house an inmate with a similar score to protect any at risk inmates. Interviews with the Risk Screening staff confirmed the screening score is used to keep inmates safe.

(b) Wilkin County makes individualized determinations about how to ensure the safety of each inmate based on the risk screening information. Interviews with Risk Screening Staff confirmed that using the risk assessment scores are made on a case-by-case and individualized basis. Policy 612 confirmed this requirement to ensure that staff are required to make individual and case-by-case determinations when ensuring the safety of each inmate.

(c) Wilkin County makes housing and program assignments for transgender or intersex inmates on a case-by-case basis. The Jail Administrator confirmed their procedure in working with medical and having the inmate complete a Transgender Questionnaire to allow the agency information as to decide of housing and programming. There were no transgender or intersex inmates in custody during the on-site review to interview and the auditor did not notice designated housing or units.

(d) Policy 612 confirms that placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate. The Jail Administrator verified this would be tracked in their shared calendar system as to schedule this reassessment. The Jail Administrator confirmed they have not had a transgender inmate for that length of duration.

(e) Interviews with Intake Staff confirmed that transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration. The Jail Administrator explained there are multiple reasons someone may have safety issues, and they would consider anything an inmate would be deemed a safety issue.

(f) Wilkin County does allow transgender and intersex inmates the opportunity to shower separately from other inmates and this is confirmed by Policy 612. There are separate shower areas in the facility that could be used away from other inmate population.

(g) Wilkin County has policies in place which prohibit placing transgender and intersex inmates in dedicated facilities, units, or wings solely based on such identification or status. Wilkin County is not under a consent decree, legal settlement,

or legal judgment for the purpose of protecting such inmates. Policy 612 confirms that classification and risk assessment is the procedure for housing decisions.

115.43 Protective Custody

Auditor Overall Determination: Meets Standard

Auditor Discussion

The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:

- WCJ Pre-Audit Questionnaire (PAQ)
- WCJ 612 PREA Policy (Issued 07/23/2024)
- Risk Assessment Inmate files
- Interview with Jail Administrator
- Interview with nine random staff
- Interview with six inmates (seven total in custody)
- Facility on-site review observations

(a) Wilkin County Policy 612 prohibits the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. In the past 12 months, there were zero inmates placed in involuntary housing for this reason. The Jail Administrator confirmed they would consider all housing options and even utilize other counties to assist if needed to prevent segregated housing.

(b) Wilkin County will give inmates access to programs, privileges, education, and work opportunities to the extent possible if inmates are placed in segregated housing for this purpose. If the jail were to restrict access to programs and services, the facility would document: the opportunities that have been limited, the duration of the limitations and the reasons for such limitations. There were no inmates in protective custody for risk of sexual victimization during the on-site review in the facility.

(c) Policy 612 confirms that when Wilkin County assigns inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. In the past 12 months, there were no high risk for sexual victimization inmates placed in segregated housing for longer than 30 days while awaiting alternative housing. The Jail Administrator verified that it would be a temporary housing situation to investigate and determine any other risks associated with potential abusers.

(d) Policy 612 confirms if an involuntary segregated housing assignment is made, the facility shall clearly document the basis of the facility's concern for the inmate's safety and the reason why no alternative means of separation can be arranged. There

	<p>were no instances of involuntary segregated housing for high-risk inmates in the past 12 months with case files for the auditor to examine at this time.</p> <p>(e) Every 30 days, Wilkin County reviews each inmate a review to determine whether there is a continuing need for separation from the general population. Interviews with Risk Screening Staff verified this is done for all inmates to see how they are adjusting to confinement. There were no instances of involuntary segregated housing for high-risk inmates in the past 12 months with case files for the auditor to examine at this time.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Someplace Safe MOU Contract • WCJ First Responder - Sexual Assault Response Checklist • WCJ Code of Conduct - Fraternalization form • CorrectionsOne Training logs • Interview with Jail Administrator • Interview with nine random staff • Interview with six inmates (seven total in custody) • Facility on-site review observations <p>(a) Wilkin County has established procedures allowing for multiple internal ways for inmates to report privately to agency officials about sexual abuse/harassment, retaliation for reporting sexual abuse/harassment and staff neglect or violation of responsibilities that may have contributed to PREA incidents. Inmates are provided this information at intake which include the address and phone number to a local advocacy Someplace Safe is provided in multiple areas for inmates to report privately such as brochures, posters, on electronic tablets, and in the inmate handbook. Interviews with both inmates and staff confirmed they knew ways to report privately.</p> <p>(b) Wilkin County provides at least one way for inmates to report abuse to a public or private entity that is not a part of the agency. The agency also has a policy requiring inmates detained solely for civil immigration purposes to be provided with information how to contact relevant consular officials and relevant officials of the Department of Homeland Security (DHS), however they do not hold inmates solely for civil immigration. The auditor reviewed the signed agreement with Someplace Safe which follows the provision of this standard. Interviews with inmates verified, most</p>

	<p>were aware of the outside agency access to report, but all were comfortable informing staff if there was an incident. The auditor performed a test call from inmate phones in different housing units and the call to Someplace Safe was free and confidential.</p> <p>(c) Wilkin County has a policy mandating that staff accept reports of sexual abuse/harassment made verbally, in writing, anonymously, and from third parties. Staff are required to document verbal reports promptly. The Jail Administrator provided a First Responder checklist that guides staff in following steps to ensure all inmates are protected and evidence is preserved. All staff interviewed confirmed the need to document verbal reports right away and to forward to a supervisor. Inmates confirmed they knew a report can be made in verbally, in writing, and by third parties. Some inmates were unsure how to report anonymously.</p> <p>(d) Wilkin County has established procedures for staff to privately report sexual abuse and sexual harassment of inmates. Policy 612 confirms staff may privately report sexual abuse/harassment of inmates to the Jail Administrator or their designee. The Jail Administrator supplied a Code of Conduct Fraternalization form that all staff sign which outlines the provision of this standard. Interviews with staff confirm they know how to privately report.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 620 Inmate Grievances Policy (Issued 04/01/2025) • Interview with six inmates (seven total in custody) • Interview with Jail Administrator • Facility on-site review observations <p>(a) Wilkin County has an administrative procedure in place for dealing with inmate grievances regarding sexual abuse. Policy 620 confirms it will process the handling emergency grievances related to sexual abuse if reported.</p> <p>(b) Wilkin County policy and procedure allows an inmate to submit a grievance regarding a sexual abuse allegation at any time regardless of when the incident is alleged to have occurred. There are procedures in place for informal resolution of inmate grievances, in which a housing officer must first attempt to resolve all grievances informally. If a grievance concerns sexual abuse/harassment allegations, it will be submitted to the shift supervisor or Jail Administrator immediately. Grievances</p>

are normally done on electronic tablets, however can be done in writing.

(c) Wilkin County policy and procedure allows an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. Additionally, policy and procedure require that an inmate grievance alleging sexual abuse not be referred to the member who is the subject of the complaint. Wilkin County has electronic tablets so all requests can be made digitally, which is monitored by supervisors.

(d) Policy 620 confirms that a decision on the merits of any grievance alleging sexual abuse shall be made within 90 days of the filing of the grievance. In the past 12 months, there were no grievances filed that alleged sexual abuse and there were no inmates who reported sexual abuse during the on-site review.

(e) Policy 620 permits third parties, including fellow inmates, staff members, family members, attorneys and outside advocates, to assist inmates in filing requests for administrative remedies related to sexual abuse and to file such requests on behalf of inmates. If an inmate declines to have third-party assistance, the agency documents the inmate's decision to decline. In the past 12 months, there were no grievances alleging sexual abuse filed by inmates or third parties on behalf of the inmate.

(f) Wilkin County has a policy and established procedures for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. The policy also requires an initial response within 48 hours. A final decision is to be made within five days. In the past 12 months, there were no emergency grievances alleging sexual abuse filed. The Jail Administrator verified that initial responses with actions are taken immediately to protect the inmate, within minutes of receiving such information.

(g) Policy 620 confirms that inmates may be disciplined for filing a false grievance related to sexual abuse only when it is determined that the inmate filed the grievance in bad faith. At the time of on-site review, there were no instances of disciplinary actions for inmates who falsely report sexual abuse in bad faith. The Jail Administrator verified this would be investigated to determine what the inmate stated as facts and there would need to be intent on behalf of the inmate to misinform about the allegation.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:

	<ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • Someplace Safe MOU (Signed 03//25/2025) • Someplace Safe Brochure • Inmate Orientation Guide • Interview with six inmates (seven total in custody) <p>(a) Wilkin County provides inmates with access to outside confidential support services through partnership with Someplace Safe. The signed agreement confirms the agency will provide outside emotional support and Someplace Safe agrees to provide inmates with confidential emotional support services. The auditor placed test calls within the housing units and at booking to Someplace Safe which were free and confidential. Inmates can mail letters from the jail and there are posters for inmates to contact Someplace Safe including phone numbers and addresses.</p> <p>(b) Wilkin County informs inmates, prior to giving them access to outside support services, the extent to which communications will be monitored. The facility also informs inmates of mandatory reporting rules governing privacy and confidentiality that apply to disclosures of sexual abuse made to outside victim advocates in accordance to local, state, and federal laws. Wilkin County provided an Inmate Orientation form which informs inmates what is being recorded. All posted Someplace Safe information is labeled as free and confidential. Interviews with inmates verified they were aware of Someplace Safe as an advocacy service.</p> <p>(c) Wilkin County maintains a current Memorandum of Understanding with Someplace Safe as a signed agreement dated 03/25/25 to provide inmates with emotional support services related to sexual abuse.</p>
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115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • Someplace Safe MOU (Signed 03//25/2025) • WCJ 612 PREA Policy (Issued 07/23/2024) • Facility on-site review observations <p>(a) Wilkin County has developed and implemented a method to receive third-party reports of sexual abuse and sexual harassment and distributes publicly information on how to report sexual abuse/harassment on behalf of an inmate. Someplace Safe will contact the agency directly and the agency publicly distributes on how to report</p>

	<p>sexual abuse or harassment.</p> <p>https://wilkincounty.gov/index.asp?SEC=04F26CEB-AD22-47CE-A6C7-CB6EF397891B</p>
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115.61	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with nine random staff • Interview with Jail Administrator • Facility on-site review observations <p>(a) Wilkin County requires in Policy 612 that all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency, any retaliation against inmates or staff who reported such incident and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Interviews with staff confirmed all understood the importance of reporting anything PREA related to their supervisor.</p> <p>(b) Wilkin County prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions, outside of reporting to supervisors or officials. Interviews with staff confirm they all know the importance of relating sexual abuse information to direct supervisors.</p> <p>(c) Medical and Mental Health practitioners at Wilkin County are required by policy to report sexual abuse and to inform inmates of the provider’s duty to report, and the limitations of confidentiality, at the invitation of services. Interviews with medical staff from ACH confirmed they would contact the Jail Administrator once any type of report comes in about sexual abuse.</p> <p>(d) If the alleged victim is under the age of 18 or considered a vulnerable adult per statute, Wilkin County shall report the allegation to the designated State or local services agency under the applicable mandatory reporting laws. The Jail Administrator verified they do not hold youthful inmates, but is required to contact social services on call number if they have a vulnerable adult involving a sexual abuse allegation.</p> <p>(e) Wilkin County reports all allegations of sexual abuse and sexual harassment</p>

	<p>including third-party and anonymous reports, to their designated investigator for follow up. The Jail Administrator verified once a report is received and the facts are understood with whom it is involved, the report will be assigned to their investigator. There were no reports to be reviewed by the auditor at the time of the on-site review.</p>
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115.62	Agency protection duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Agency Head • Interview with Jail Administrator • Interview with nine random staff <p>(a) Wilkin County requires all staff to take immediate action to protect the inmate from imminent sexual abuse specified in Policy 612. The Sheriff, Jail Administrator, and staff confirmed they understood that “immediate” means when the response is needed right away within minutes if the abuse was recent. Staff talked about stopping all tasks to ensure the inmate is safe and to report it to the Jail Administrator. In the past 12 months, there were no reports of an inmate at imminent risk of sexual abuse.</p>

115.63	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Agency Head • Interview with Jail Administrator <p>(a) Wilkin County has a policy requiring that, upon receiving an allegation that an inmate was sexually abused at another facility, the head of the facility must notify the head of the other facility where the sexual abuse is alleged to have occurred. The Jail</p>

	<p>Administrator verified there was one in the last 12 months at another facility which resulted in it being unfounded. The Jail Administrator explained they clarified with the inmate some details in order to forward the information to another facility.</p> <p>(b) Wilkin County documents that it has provided such notification within 72 hours of receiving the allegation. Policy 612 confirms that the Jail Administrator documents the date/time of the incident as well as the date/time of notification. The Jail Administrator verified this is done the same day the allegation is received from the inmate.</p> <p>(c) Wilkin County documents that it has provided such notification within 72 hours of receiving the allegation. If there is an allegation that an inmate was sexually abused while he/she was confined at another facility, the Jail Administrator shall notify the head of that facility as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p>(d) Wilkin County policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards. The Sheriff and Jail Administrator both confirmed the importance of these allegations and the need for an investigation. In the past 12 months there were zero allegations received of inmate sexual abuse at another confinement facility.</p>
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115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with First Responder Staff • Interview with six inmates (seven total in custody) <p>(a) Wilkin County has a policy for first responder responses to allegations of sexual abuse. Policy 612 requires the first corrections officer that responds to: (1) separate the parties; (2) Request medical assistance (medical and mental health) as appropriate; (3) Establish a crime scene to preserve and protect evidence and identify and secure witnesses; (4) Collect physical evidence if time allows - request the alleged victim and ensure that the alleged abuser do not take any actions that could destroy physical evidence (i.e., washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating); (5) Consider a change in classification or housing for safety reasons; (6) Determine whether the alleged perpetrator should be administratively segregated or administratively transferred during the investigation.</p>

	<p>There have been no instances in the past 12 months where the first responder was security personnel. Interviews with staff verified their duties upon learning of an incident of sexual abuse. There were no inmates who reported sexual abuse at the time of the on-site review.</p> <p>(b) Policy 612 requires if the first responder is not a corrections officer, the responder shall request the alleged victim to refrain from any actions that could destroy physical evidence and to immediately notify a corrections officer. There were zero instances in the past 12 months where the first responder was non-security personnel.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ First Responder - Sexual Assault Response Checklist • Interview with Jail Administrator <p>(a) The auditor reviewed Policy 612 related to the coordinated response plan, reviewed the signed agreement with Someplace Safe, medical vendor ACH, an interview with the Jail Administrator, and SANE staff at St. Francis Medical Center. Policies and procedures among all staff and vendors properly coordinate actions between first responders, medical and mental health practitioners, investigators, and the agency. The Jail Administrator verified the use and training of the First Responder checklist among staff.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • Union Contract (Issued 2024-2026)

	<ul style="list-style-type: none"> • Interview with Agency Head <p>(a) Wilkin County will remove alleged staff sexual abusers from contact with inmates pending the outcome of the investigation. Interviews with the Sheriff confirm the agency is not restricted in any way from protecting inmates from contact with abusers. The auditor reviewed the current union contract language for staff and there is no language allowing staff to have contact with inmates.</p> <p>(b) The auditor is not required to audit this provision.</p>
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115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Agency Head • Interview with Jail Administrator • Interview with Staff to monitor retaliation • Interview with six inmates (seven total in custody) <p>(a) Wilkin County has policies to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with investigations from retaliation by other staff or inmates. The Sheriff confirmed that the Jail Administrator is designated to monitor for possible retaliation. All inmates and staff who report sexual abuse/harassment, or who cooperate with sexual abuse/harassment investigations, will be protected from retaliation.</p> <p>(b) Wilkin County takes protective measures, including housing changes, transfers, removal of alleged abusers from contact with victims, administrative reassignment or reassignment of the victim or alleged perpetrator to another housing area, and support services for inmates or staff who fear retaliation shall be utilized. The Jail Administrator verified the need to protect anyone and monitor retaliation for reporting or cooperating with investigations. The Jail Administrator added to utilize other counties to assist in housing for protection.</p> <p>(c) Wilkin County monitors, for at least 90 days, the conduct and treatment of inmates or staff who report sexual abuse/harassment, as well as inmates who were reported to have suffered sexual abuse, to determine if there is any possible retaliation. The supervisor shall act promptly to remedy any such retaliation. The Jail Administrator explained they would observe inmates and staff activities and also</p>

	<p>meet with the inmate and staff being monitored to ensure there is no signs of retaliation. There have been no allegations that required monitoring.</p> <p>(d)) In the case of inmates, such monitoring shall also include periodic status checks. Interview with the Jail Administrator confirmed this would be done per Policy 612. The Jail Administrator will take reasonable steps to limit the number of people with access to the names of individuals being monitored and should make reasonable efforts.</p> <p>(e) If any other individual who cooperates with an investigation expresses a fear of retaliation, Wilkin County will take appropriate measures to protect that individual against retaliation. The Sheriff confirmed all complaints of retaliation will be taken seriously and will be promptly and thoroughly investigated.</p> <p>(f) The auditor is not required to audit this provision.</p>
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115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Jail Administrator • Interview with nine random staff • Interview with six inmates (seven total in custody) <p>(a) Wilkin County will find alternative housing units that provide protection for the inmate without segregating or isolating them. Wilkin County’s first response is to remove the abuser. If protective custody was used, it would be for a limited duration until appropriate housing could be located. In the past 12 months, there were no inmates placed in involuntary housing who alleged to have suffered abuse. If so, an assessment would be completed within 24 hours. There were also no inmates in this status that were segregated for longer than 30 days awaiting alternative placement. If an inmate is placed in involuntary segregated housing for these reasons, a statement of the basis for the facility’s concern for the inmate’s safety would be documented and the report would specify the reasons why alternative means of separation could not be arranged. Interviews with staff confirmed there was no segregated housing for alleged abused inmates. There were no inmates in segregated housing or alleged to have suffered sexual abuse.</p>

115.71	Criminal and administrative agency investigations
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Auditor Overall Determination: Meets Standard

Auditor Discussion

The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:

- WCJ Pre-Audit Questionnaire (PAQ)
- WCJ 612 PREA Policy (Issued 07/23/2024)
- Interview with Investigative Staff
- Interview with six inmates (seven total in custody)
- Interview with Jail Administrator
- Facility on-site review observations

(a) Wilkin County has a policy to investigate allegations of sexual abuse and sexual harassment promptly, thoroughly, and objectively. This includes third-party and anonymous reports. Interview with investigative staff was interviewed confirmed that an allegation of sexual abuse/harassment would be investigated right away, less than 24 hours to initiate an investigation. The investigator confirmed that third party and anonymous reports are taken seriously and are handled the same as an identified report. He said that there are many ways that a report of an allegation of sexual abuse would come in. Policy 612 states an administrative investigation, criminal investigation, or both shall be completed for all allegations of sexual abuse and sexual harassment. The Sheriff and Jail Administrator confirmed an investigation would immediately be initiated, the same as a criminal investigation. A substantiated allegation that appears to be criminal is referred to the County Attorney's Office for prosecution.

(b) Wilkin County has a trained licensed investigator who conducts criminal investigations and two trained investigators who conduct administrative investigations. The investigator received specialized training outlined in standard 115.34. The investigator explained the investigative process, from initiating the investigation, collecting evidence, interviewing, completing the final report, and determining the final disposition of the allegation.

(c) Wilkin County has policies described for an investigation which documents in written reports include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. Investigators shall gather and preserve direct and circumstantial evidence, including DNA evidence and any available electronic monitoring data, interview alleged victims, suspects, and witnesses, and review prior complaints and reports involving the suspected perpetrator. Interview with the investigator confirmed that initiating an investigation the parties would be separated, medical care provided, and safety for all. Interviews and preservation of evidence would be the first steps before reports being sent to prosecution if there are substantiated allegations.

(d) Suspects who are in custody and subject to interrogation shall be given the Miranda Warning. When the quality of evidence appears to support criminal

prosecution, Wilkin County conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Specialized investigative training for investigators includes the uniform evidence protocol to maximize potential for obtaining useable physical evidence, techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or referral for prosecution.

(e) Wilkin County Policy 612 confirms the credibility of an alleged victim, suspect, or witness that shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. Policy 612 prohibits polygraph examinations on victims of sexual abuse as part of the condition for proceeding with the investigation, charging, or prosecution of such offenses. The investigator confirmed that the totality of the circumstances would determine the credibility of the victim, perpetrator, and witnesses.

(f) Wilkin County completes administrative investigations to include an effort to determine whether staff actions or failures to act contributed to the abuse and shall be documented in written reports which include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and the investigative facts and findings. The auditor reviewed Policy 612 which confirms the same standard language in this provision.

(g) Wilkin County completes criminal investigations that shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence with attachments of all documentary evidence where feasible. Interview with the investigator confirmed that all investigative reports are thoroughly documented with case files and supplementary reports, documents, and media files.

(h) Policy 612 confirms substantiated allegations of conduct that appear to be criminal are referred for prosecution. Interviews with investigative staff verified that all completed investigations are always referred to the County Attorney. There were no reports or records relative to this standard to be reviewed by the auditor at the time of the on-site review.

(i) Wilkin County Policy 612 retains all written reports from administrative and criminal investigations pursuant to this standard and policy for as long as the alleged abuser is held or employed by the office, plus-five years. All other data collected is securely maintained for at least ten years after the date of the initial collection.

(j) The Jail Administrator and investigator confirmed that an investigation would continue even if staff were no longer with the agency as an alleged abuser.

(k) The auditor is not required to audit this provision.

(l) If an outside agency investigates sexual abuse, Wilkin County will cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation. The primary contact would be the Jail Administrator. The Jail Administrator confirmed if any information was found during the administrative

	<p>investigation, all reports and information would be relayed to the outside agency. It is the Jail Administrator's responsibility to ensure agreements with outside investigative agencies that include PREA requirements, including a requirement to keep Wilkin County informed as to the progress of the investigation.</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 facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Investigative Staff <p>(a) The evidentiary standard for Administrative Investigations is a Preponderance of the Evidence. All completed written investigations are forwarded to the Sheriff and Jail Administrator. The Sheriff and Jail Administrator shall review the investigation and determine whether any allegations of sexual abuse or sexual harassment have been substantiated by a preponderance of the evidence. Interview with the investigator confirmed that there is no evidence higher than a preponderance of the evidence for investigations. There was no sample documentation of administrative findings for the auditor to review at the time of the on-site audit.</p>

115.73	Reporting to inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Jail Administrator • Interview with Investigative Staff • Interview with six inmates (seven total in custody) <p>(a) Wilkin County Policy 612 requires that any inmate who alleges that he or she suffered a sexual abuse in jail is informed, verbally or in writing, as to whether the</p>

allegation has been substantiated, unsubstantiated, or unfounded following an investigation. The Jail Administrator or designee is required by policy to inform a victim inmate in writing whether an allegation has been substantiated, unsubstantiated, or unfounded. In the past 12 months, there were no sexual abuse/harassment complaints. If Wilkin County did not conduct the investigation, relevant information from the investigative agency must be requested to inform the inmate. If a staff member is the accused, the inmate shall also be informed whenever the staff member is no longer assigned to the inmate's unit or employed at the facility, and if the staff member has been indicted or convicted on a charge related to a sexual abuse within the facility. All notifications or attempted notifications shall be documented.

(b) If an outside agency conducts a sexual abuse/harassment investigation, Wilkin County would request the relevant information to inform the inmate of the outcome of the investigation. In the past 12 months, there were no instances of outside investigations for the provision of this standard.

(c) Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, Wilkin County would inform the inmate (unless the agency has determined that the allegation is unfounded) whenever: the staff member is no longer assigned to the inmate's unit or employed at the facility; and the agency learns that the staff member has been indicted or convicted on a charge related to a sexual abuse within the facility. There have been no substantiated or unsubstantiated complaints of sexual abuse committed by a staff member against an inmate in the facility in the past 12 months. All notifications or attempted notifications shall be documented.

(d) Following an inmate's allegation that he/she was sexually abused by another inmate, Wilkin County shall 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; or the agency learns that the alleged abuser has been convicted of a charge related to sexual abuse within the facility. PREA Inmate Notification forms were again reviewed for compliance of this standard.

(e) All notifications or attempted notifications shall be documented. When notification is made while the inmate is in custody, the inmate will sign a copy of the notification letter. The letter will be added to the case file. This is all confirmed in Policy 612 reviewed by the auditor.

(f) Auditors are not required to audit this provision.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) <p>(a) Wilkin County staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Wilkin County holds the right to discipline employees as appropriate in respect to the union contract based on severity of actions. Termination is the presumptive disciplinary sanction for staff members who have engaged in sexual abuse. Sexual or other unlawful harassment is a prohibited behavior that may result in discipline up to and including termination from employment.</p> <p>(b) Policy 612 confirms termination is the presumptive disciplinary sanction for staff members who have engaged in sexual abuse. There have been no staff from the facility who have violated agency sexual abuse/harassment policies in the past 12 months.</p> <p>(c) Policy 612 confirms all discipline 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. There were no disciplinary records available for review because there have been zero staff alleged to have committed a sexual abuse or sexual harassment in the past 12 months.</p> <p>(d) Policy 612 confirms all terminations for violations of agency sexual abuse or sexual harassment policies are to be reported to law enforcement agencies and to any relevant licensing bodies unless the activity was clearly not criminal. This applies to resignations by staff who would have been terminated if not for their resignation. There have been no staff from the facility who have violated agency sexual abuse/harassment policies that have been reported to law enforcement or licensing boards following their termination in the past 12 months.</p>
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115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Jail Administrator

	<p>(a) Wilkin County Policy 612 requires that any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to law enforcement agencies and to relevant licensing bodies unless the activity clearly was not criminal. The policy also requires that any contractor or volunteer who engages in sexual abuse are immediately prohibited from any contact with inmates. The contractor or volunteer will be promptly reported to the law enforcement agency that would investigate such allegations and be brought to the attention of any relevant licensing bodies. In the past 12 months, there have been no instances of sexual abuse or sexual harassment by contractors or volunteers in Wilkin County.</p> <p>(b) Wilkin County Policy 612 confirms appropriate remedial measures are taken and considers whether to prohibit further contact with inmates in the case of any other violation of sexual abuse/harassment policies by a contractor or volunteer. Wilkin County does not tolerate any form of harassment, offensive, and violent behavior towards inmates. Interview with the Jail Administrator verified that an investigation would begin and pause all activity until it was completed. The Jail Administrator clarified that security clearance could be removed.</p>
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115.78	Disciplinary sanctions for inmates
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • Wilkin County Jail Inmate Handbook (Issued 02/2025) • WCJ 608 PREA Policy (Issued 07/23/2024) • WCJ 600 Inmate Discipline Policy (Issued 04/01/2025) • Freedom Behavioral Health website • Interview with Jail Administrator • Interview with Medical and Mental Health Staff <p>(a) Inmates at Wilkin County are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt. The auditor reviewed the Inmate Handbook which confirmed notice of discipline to inmates for sexual abuse and harassment. In the past 12 months, there were no instances of inmate-on-inmate sexual abuse in Wilkin County.</p> <p>(b) Inmate sanctions shall be 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. The Jail Administrator confirmed they would impose minor sanctions up to criminal charges.</p>

	<p>(c) Wilkin County verified that mental disability or mental illness is always considered when determining sanctions. The Jail Administrator confirmed inmates are rarely penalized for falsely reporting a sexual abuse/sexual harassment due to mental health issues and medical would be partnered with for information of the inmate.</p> <p>(d) Wilkin County offers therapy, counseling, and other interventions designed to address and correct the underlying motivations for abuse. Wilkin County would utilize Freedom Behavioral Health as part of this provision for this standard.</p> <p>(e) Wilkin County Policy 600 may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.</p> <p>(f) For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon 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. The auditor reviewed Policy 600 and is consistent with this standard language. There were no inmate sanctions for falsely reporting sexual abuse.</p> <p>(g) Wilkin County Policy 600 prohibits all sexual activity between inmates and may discipline inmates for such activity. Consensual sexual contact does not constitute sexual abuse if the activity is not coerced. The auditor reviewed the inmate handbook and Policy 600 which advises inmates that consensual sexual contact with another inmate may be disciplined. The Jail Administrator confirmed that sexual activity between inmates is not allowed and is considered a violation.</p>
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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Medical History and Health Appraisal form • Mental Health Screening Interview logs • Interview with Risk Screening Staff • Interview with six inmates (seven total in custody) • Facility on-site review observations <p>(a) & (c) All inmates at Wilkin County who have disclosed any prior sexual victimization during the PREA Screening process at intake pursuant to Standard 115.41 are offered a follow-up meeting with a medical or mental health practitioner.</p>

The follow-up meeting must be offered within 14 days of the PREA Screening. The follow-up meeting is documented and maintained on the Health Appraisal Form. This is confirmed in Policy 612 and Health Appraisal Form that medical will complete an assessment for victim advocacy services and mental health treatment. In the past 12 months, all inmates who disclosed prior sexual victimization during the intake process were offered a follow-up meeting with medical/mental health staff.

(b) Wilkin County is not a prison and is not applicable to this provision of the standard.

(d) Any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical/mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, work, education, and program assignments, or as otherwise required by Federal, State, or local law. Wilkin County recognizes that inmates have a right to privacy and confidentiality regarding their health-related issues. The Jail Administrator confirmed medical would notify the Jail Administrator of the prior history, custody staff are not notified by medical. Medical records are securely maintained for privacy

(e) Medical and Mental Health Practitioners that provide correctional care at Wilkin County obtain informed consent from the inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18. Interview with Medical Health Staff confirmed consent is obtained before asking inmates about physical violence.

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • WCJ First Responder - Sexual Assault Response Checklist • Interview with Medical and Mental Health Staff • Interview with six inmates (seven total in custody) • Interview with First Responder Staff <p>(a) 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 judgement. Policy 612 confirms that inmates who are victims of sexual abuse shall be</p>

	<p>transported to the nearest appropriate location for treatment of injuries and collection of evidence, and for crisis intervention services. First Responders are instructed to request medical assistance as appropriate if an allegation of inmate sexual abuse is made. Medical Staff reported they would receive treatment notes and discharge paperwork from the hospital.</p> <p>(b) If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to Standard 115.62 and shall immediately notify the appropriate medical and mental health practitioners. The First Responders Checklist affirms first response action is to separate the parties, and then secondly to take preliminary steps to protect the victim and notify medical/mental health practitioners immediately after that. The Emergency Health Care Policy provides for inmate access to emergency health care as needed.</p> <p>(c) Inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care. Interview with Medical staff verified that victims of sexual abuse are offered timely information about access to emergency contraception and sexually transmitted infection prophylaxis at the emergency room in conjunction with the forensic examination. The medical staff assists with the coordination and follow-up treatment of any discharge instruction by the provider.</p> <p>(d) Wilkin County Policy 612 confirms treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. The Jail Administrator verified that inmate victims of sexual abuse are not required to pay for medical emergency treatment services because of an assault in the jail. There would be no exceptions to this rule.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Interview with Medical and Mental Health Staff • Interview with six inmates (seven total in custody)

(a) Wilkin County offers medical and medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in the jail or other correctional facility. A review of Policy 612 has requirements indicated that victims shall be provided with 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.

(b) The evaluation and treatment of such victims includes follow-up services, treatment plans, and referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. Wilkin County contracts with Advanced Correctional Healthcare, Inc (ACH) for all their jail medical needs. The auditor reviewed ACH call sheets and inmate transfer form addressing continuity of care for their medical needs for those inmates being transferred to another facility. Medical staff described what the evaluation and treatment of inmates who have been victimized entail. It would be their responsibility to coordinate with the outside medical providers and to follow up in accordance with the hospital release instructions. Mental health services are also provided with a treatment plan put in place through Freedom Behavioral Health.

(c) Wilkin County and ACH provide such victims with medical/mental health services consistent with the community level of care. It is the policy of Wilkin County that all inmates, regardless of custody status, housing location, or ability to pay will have timely access to a qualified health care professional and receive appropriate care and/or treatment.

(d) Policy 612 confirms that inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. Medical staff and the Jail Administrator confirm that inmate victims of sexual abuse are indeed offered all the necessary services that are normally offered to sexual assault victims in the community, including pregnancy tests. Medical staff confirmed that pregnancy tests are conducted at the jail.

(e) Policy 612 confirms if pregnancy results because of sexually abusive vaginal penetration, the inmate victim shall receive timely and comprehensive information about access to all lawful pregnancy-related medical services. Interviews with Medical Staff confirmed that records, testing, pre-natal care, and coordination of appointments are provided. There were no inmates who reported sexual abuse at the facility during the on-site portion of the audit.

(f) Policy 612 confirms inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate. Interviews with Medical Staff and the Jail Administrator confirm any inmate would be offered testing for sexually transmitted diseases with counseling for the treatment available. Victims are also offered information about, and given access to, emergency contraception, prophylaxis for sexually transmitted infections, and follow-up treatment. This shall be done in a timely manner.

(g) Policy 612 confirms that treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates

	<p>with any investigation arising out of the incident. There were no inmates who reported sexual abuse to interview, however medical staff and the Jail Administrator all confirmed that inmate victims are not charged for any emergency or treatment services arising out of a sexual assault incident in their facility.</p> <p>(h) Wilkin County is not a prison and is not applicable to this provision of the standard.</p>
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • PREA Annual Statistics Report 2024-2025 • Interview with Jail Administrator • Interview with Incident Review Team member <p>(a) Wilkin County Policy 612 confirms at the conclusion of every sexual abuse investigation, they conduct a sexual abuse incident review, unless the determination is unfounded. At the time of this audit, there were no criminal and/or administrative investigations of alleged sexual abuse completed at the facility.</p> <p>(b) Policy 612 confirms the PREA Incident Review shall ordinarily occur within 30 days of the conclusion of the investigation. At the time of this audit, there were no incident reviews that were completed nor any stemming from an incident that needed to be completed.</p> <p>(c) Policy 162 confirms the review team includes upper-level management officials, with input from line supervisors, investigators, and medical/mental health practitioners. The Jail Administrator verified they have not yet used an incident review team before; however they have a plan to assemble the following: Sheriff, Jail Administrator, Lead Correctional Officer, and Medical.</p> <p>(d) Policy 612 confirms that a report of its findings from the sexual abuse incident review team which include determinations made pursuant to all the requirements of this section and any improvements recommended and submits the report to the Sheriff and Jail Administrator. The auditor reviewed the annual sexual abuse and harassment incidents which revealed no incidents for 2024 and 2025. This was confirmed by interviews with the Sheriff and Jail Administrator.</p> <p>(e) Policy 612 confirms that from the sexual abuse incident review report, the agency</p>

	<p>will implement recommendations for improvements or documents the reason for not doing so. The Jail Administrator verified they would look at the facts and data from the report to determine what the causes were, training opportunities, policy review, staffing levels, technology updates, or design issues.</p>
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115.87	Data collection
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • PREA Annual Statistics Report 2024-2025 • Interview with Jail Administrator <p>(a) As required of this standard, Wilkin County collects accurate, uniform data for every allegation of sexual abuse using a standardized instrument and a set of definitions. The auditor reviewed Policy 612 which follows the provision of this standard.</p> <p>(b) Wilkin County aggregates the data referenced above on an annual basis and presents it in the form of the PREA Annual Statistics Report 2024-2025 posted publicly on their website.</p> <p>https://wilkincounty.gov/index.asp?SEC=04F26CEB-AD22-47CE-A6C7-CB6EF397891B</p> <p>(c) Policy 612 confirms the incident-based data collected includes the data necessary to answer all questions from the Survey of Sexual Victimization (SSV) by the Department of Justice (DOJ).</p> <p>https://bjs.ojp.gov/data-collection/survey-sexual-victimization-ssv</p> <p>(d) Wilkin County maintains, reviews, and collects data as needed from all incident-based documents, including reports, investigation files, and sexual abuse incident reviews. This is confirmed in Policy 612 and by the Jail Administrator.</p> <p>(e) Wilkin County does not contract other facilities for the confinement of its inmates and is not applicable to this provision of the standard.</p> <p>(f) Wilkin County has not been asked to participate in the Survey Sexual Victimization from the DOJ.</p>

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Wilkin County Website • PREA Annual Statistics Report 2024-2025 • Interview with Agency Head • Interview with Jail Administrator <p>(a) Wilkin reviews data collected and aggregated to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. The annual review includes identifying problem areas, taking corrective action on an on-going basis, and preparing an annual report of its findings from its data review and any corrective actions. Interview with the Sheriff confirms the agency uses the data collected for improvements to identify problem areas in the jail and to prevent abuse. The Jail Administrator added that the purchase of body worn cameras for staff is an improvement for their agency.</p> <p>(b) The annual report as referenced above includes a comparison of the current year’s data and corrective actions or improvements with those reports for previous years. Wilkin County will use data from incidents to track the progress of any required improvements.</p> <p>(c) Wilkin County makes its annual report readily available to the public on an annual basis through its website. The Sheriff confirmed the report is discussed with the Jail Administrator prior to being posted to their website.</p> <p>https://wilkincounty.gov/index.asp?SEC=04F26CEB-AD22-47CE-A6C7-CB6EF397891B</p> <p>(d) The annual reports as previously described shall be approved by the Sheriff and made available through their county website. Material may be redacted from the reports when publication would present a clear and specific threat to the safety and security of the facility. The Jail Administrator confirmed they would remove personal identifying information and use only numerical data.</p>

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • WCJ 612 PREA Policy (Issued 07/23/2024) • Wilkin County Website • Interview with Jail Administrator • Facility on-site review observations <p>(a) Wilkin County securely retains its data collected pursuant to 115.87. The Jail Administrator verified that all data that is collected is filed in a private online storage or his office with no access allowed to other staff.</p> <p>(b) Wilkin County makes all aggregated sexual abuse data readily available to the public annually through its website.</p> <p>https://wilkincounty.gov/index.asp?SEC=04F26CEB-AD22-47CE-A6C7-CB6EF397891B</p> <p>(c) Wilkin County removes all personal identifiers before making aggregated sexual abuse data publicly available.</p> <p>(d) Wilkin County maintains 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. The auditor reviewed data that was from 2022 which was the start of data collection pursuant to this standard.</p>
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115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • WCJ Pre-Audit Questionnaire (PAQ) • Notice of PREA Audit • Wilkin County Website • Interview with Jail Administrator • Facility on-site review observations <p>(a) This is the first audit for Wilkin County Jail and the only facility operated in Wilkin County.</p> <p>(b) This is the first audit for Wilkin County Jail and the only facility operated in Wilkin County.</p>

	<p>(h) The auditor had full and unlimited access and observed operations in every area of the Wilkin County Jail. The auditor reviewed many procedures and documentation during the on-site audit process and the agency was thorough in supplying all requested documentation during the corrective action process.</p> <p>(i) The auditor was provided with all relevant policies, handbooks, brochures, schedules, rosters, any other requested document throughout all PREA audit process. During the on-site audit process, the Jail Administrator allowed the auditor to take photographs of facility design, flyers, and was given copies of all supporting documents for compliance. The auditor relied on the Jail Administrator to obtain additional documentation during a timeframe when the electronic OAS portal system was inaccessible.</p> <p>(m) The auditor conducted formal interviews in a private setting in the programs area. Interview selections were made for all inmates in custody at the time with a total of seven, six were completed by the auditor. The auditor was allowed sufficient time to conduct interviews with personnel and inmates with no time constraints. There was no confidential correspondence to the auditor during the audit process.</p> <p>(n) There was no confidential correspondence to the auditor during the audit process. The auditor confirmed the Notice of PREA Audit postings were posted at least 6 weeks prior to the on-site review in English and Spanish and observed the postings during the on-site review. The Jail Administrator confirmed all inmates had access to write the auditor privately similarly to attorney legal mail and the auditor observed the correct address on all notice postings throughout the facility.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility meets this standard, and the following evidence was relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Interview with Jail Administrator • Wilkin County Website <p>(f) This is the first audit for Wilkin County Jail. The Jail Administrator confirmed once they receive a copy of the final report it will be published on their public website under the PREA section of the Sheriff's Office.</p> <p>https://wilkincounty.gov/index.asp?SEC=04F26CEB-AD22-47CE-A6C7-CB6EF39-7891B</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.)	na
	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.)	na
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.)	na
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	na

	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.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

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

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

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

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

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

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

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

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

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
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.)	na
	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.)	na
	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.)	na
	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	na

	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.)	na
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.)	na

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.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

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

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	no
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (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.)	na