

PREA Facility Audit Report: Final

Name of Facility: Cobb County Adult Detention Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 04/17/2023

| 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: Mable P. Wheeler | Date of Signature: 04/17/2023 |

| AUDITOR INFORMATION | |
|-------------------------------------|-----------------------|
| Auditor name: | Wheeler, Mable |
| Email: | wheeler5p@hotmail.com |
| Start Date of On-Site Audit: | 03/06/2023 |
| End Date of On-Site Audit: | 03/08/2023 |

| FACILITY INFORMATION | |
|-----------------------------------|---|
| Facility name: | Cobb County Adult Detention Center |
| Facility physical address: | 1825 County Services Parkway, Marietta, Georgia - 30008 |
| Facility mailing address: | |

| Primary Contact | |
|--------------------------|-----------------------------|
| Name: | Stacey Bains |
| Email Address: | stacey.bains@cobbcounty.org |
| Telephone Number: | 770-499-4767 |

| Warden/Jail Administrator/Sheriff/Director | |
|---|-------------------------------------|
| Name: | Rebekah Westenberger |
| Email Address: | Rebekah.Westenberger@cobbcounty.org |
| Telephone Number: | 770-499-4220 |

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

| Facility Health Service Administrator On-site | |
|--|---------------------|
| Name: | Sandra Tilton |
| Email Address: | STilton@Wellpath.us |
| Telephone Number: | 678-355-7069 |

| Facility Characteristics | |
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| Designed facility capacity: | 3067 |
| Current population of facility: | 1992 |
| Average daily population for the past 12 months: | 1956 |
| Has the facility been over capacity at any point in the past 12 months? | No |
| Which population(s) does the facility hold? | Both females and males |
| Age range of population: | 17-80 |
| Facility security levels/inmate custody levels: | Min, Med 1,2,& 3, Max 1 & 2 |
| Does the facility hold youthful inmates? | Yes |
| Number of staff currently employed at the facility who may have contact with inmates: | 621 |
| Number of individual contractors who have contact with inmates, currently authorized to enter the facility: | 263 |
| Number of volunteers who have contact with inmates, currently authorized to enter the facility: | 0 |

| AGENCY INFORMATION | |
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| Name of agency: | Cobb County Sheriff's Office |
| Governing authority or parent agency (if applicable): | |
| Physical Address: | 1825 County Services Parkway, Marietta, Georgia - 30008 |
| Mailing Address: | |
| Telephone number: | |

| Agency Chief Executive Officer Information: | |
|--|-----------------------------|
| Name: | Sheriff Craig D. Owens, Sr. |
| Email Address: | craig.owens@cobbcounty.org |
| Telephone Number: | 770-499-4611 |

| Agency-Wide PREA Coordinator Information | | | |
|---|--------------|-----------------------|-----------------------------|
| Name: | Stacey Bains | Email Address: | stacey.bains@cobbcounty.org |

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

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

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| 1. Start date of the onsite portion of the audit: | 2023-03-06 |
| 2. End date of the onsite portion of the audit: | 2023-03-08 |

Outreach

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| 10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| a. Identify the community-based organization(s) or victim advocates with whom you communicated: | YWCA Northwest Georgia (Advocate) LIVESAFE Resources (Advocate) Just Detention International (No information received) |

AUDITED FACILITY INFORMATION

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| 14. Designated facility capacity: | 3067 |
| 15. Average daily population for the past 12 months: | 1956 |
| 16. Number of inmate/resident/detainee housing units: | 71 |
| 17. Does the facility ever hold youthful inmates or youthful/juvenile detainees? | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility) |

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

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

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| 36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit: | 2025 |
| 37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit: | 5 |
| 38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit: | 2 |
| 39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit: | 2 |
| 40. 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 |
| 41. 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 |
| 42. 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: | 2 |

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| 43. 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: | 2 |
| 44. 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: | 0 |
| 45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit: | 3 |
| 46. 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: | 3 |
| 47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit: | 0 |

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| <p>48. 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>On day one of the on-site portion of the audit, the auditor was provided the housing roster or "Rolls/Name Report". Using this report, the auditor was able to identify youthful offenders, females, and males confined persons that were housed at the facility, and housing locations.</p> <p>The reports identified the following housing information:</p> <ol style="list-style-type: none"> 1. Five Youthful Offenders 2. General Population Confined Persons (males) 3. General Population Confined Persons (females) 4. Disciplinary Segregation (males) 5. Mental Health Segregation (females) 6. Medical Segregation 7. Transitional General Population 8. Infirmary 9. Mental Health (Close Observation) 10. Inmate Workers 11. Fulton County Confined Person |
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Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit

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| <p>49. 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>621</p> |
| <p>50. 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>0</p> |
| <p>51. 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> | <p>263</p> |

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| <p>52. 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> | <p>On day one of on-site portion of the audit, the facility employed (621) staff member to include management, administrative, and security. Medical and Mental Health services are contracted through Well Path.</p> |
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INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

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| <p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p> | <p>21</p> |
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| <p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p> | <p> <input type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p> |
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| <p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p> | <p>Using the Inmate Rolls/Name Report Roster, the auditor selected confined persons by age, race, ethnicity, gender and housing assignment. The interviewees were geographically diverse. This facility houses male, and female confined persons, and youthful offenders.</p> |
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| <p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p> | <p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p> |
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| <p>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p> | <p>The auditor had no barriers completing confined person interviews. Staff ensured interviewees were readily available to the auditor for interview. No confined person refused interview with the auditor. All interviewed confined person were forthcoming, and polite, all interviews were conducted in complete privacy.</p> |
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Targeted Inmate/Resident/Detainee Interviews

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| <p>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p> | <p>19</p> |
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As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

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| <p>59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:</p> | <p>3</p> |
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| <p>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p> | <p>1</p> |
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| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |
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| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>No text provided.</p> |
| <p>61. 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>2</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 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>No text provided.</p> |
| <p>62. 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> |

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| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |
| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>Through discussion with Medical staff, the auditor determined, no youth or confined person housed at the facility blind or had low vision.</p> |
| <p>63. 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>Through discussion with Medical staff, the auditor determined no youth or confined person housed at the facility, had a hearing disability or was deaf.</p> |
| <p>64. 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>2</p> |

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| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input 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>No text provided.</p> |
| <p>65. 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>1</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 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>No text provided.</p> |
| <p>66. 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> |

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| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p> |
| <p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p> | <p>Through discussion with Medical staff and Mental Health staff, the auditor determined no youth or confined person housed at the facility, identified as transgender or intersex.</p> |
| <p>67. 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>3</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 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>No text provided.</p> |
| <p>68. 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>3</p> |

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| <p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p> | <p><input 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>No text provided.</p> |
| <p>69. 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>During on-site portion of the audit, no youth or confined person was housed in segregation for risk of sexual victimization.</p> |

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| <p>70. 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 did not over sample any select group, nor did the auditor have any barriers to completing targeted confined persons interviews, or youthful offender interviews.</p> |
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Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

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| <p>71. Enter the total number of RANDOM STAFF who were interviewed:</p> | <p>17</p> |
| <p>72. 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 checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input checked="" type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None </p> |
| <p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p> | <p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p> |
| <p>74. 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 selected random staff for interview using the Staff Roster; staff was selected by shift assignment, work assignment, and rank. The auditor had no barriers completing interviews. All interviews were conducted in complete privacy.</p> |

Specialized Staff, Volunteers, and Contractor Interviews

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

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| 75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors): | 15 |
| 76. Were you able to interview the Agency Head? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 77. Were you able to interview the Warden/Facility Director/Superintendent or their designee? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 78. Were you able to interview the PREA Coordinator? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 79. 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) |

80. 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

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| | <input checked="" type="checkbox"/> Intake staff <input type="checkbox"/> Other |
| 81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility? | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| 82. 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 |
| 83. Provide any additional comments regarding selecting or interviewing specialized staff. | <p>The auditor selected specialized staff for interview using the PRC Interview Protocol. The Cobb County Adult Detention Center does not have volunteers that provide services to confined person. Nor does the facility contract for the confinement of confined persons. Medical and Mental Health staff interviewed are contracted to provide services through Well Path.</p> |

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.

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

Yes

No

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

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

Yes

No

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

Yes

No

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

Yes

No

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| 88. Informal conversations with staff during the site review (encouraged, not required)? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
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| | |
|---|---|
| 89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations). | During the site review, the auditor had access to the entire facility. The auditor was accompanied by staff members during the site review. The auditor tested phones to confirm they were operational. Fifty-nine (59) confined persons were informally interviewed during the site review, all interviewed could name multiple ways to reports sexual abuse and sexual harassment. PREA signage was posted throughout the facility. Audit Notices were observed in common areas accessible to visitors, staff and confined persons. Two (2) confined persons corresponded with the auditor via USA mail prior to the on-site audit. Both confined persons were interviewed during the audit. The auditor received no correspondence from staff, contractors, volunteers, or outside interested party. |
|---|---|

Documentation Sampling

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

| | |
|---|--|
| 90. 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? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
|---|--|

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

The auditor received documents as requested, including those stored electronically. The PREA Compliance Coordinator provided additional documents and policies on flash drives in addition to the information uploaded in the online PRE-Audit Questionnaire.

The auditor requested additional documentation for clarification during the report writing phase. The auditor requested additional documentation to confirm Sexual Abuse Incident Reviews were completed within 30 days of completion of investigations. The information was provided as requested.

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.

92. 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 | 21 | 2 | 21 | 0 |
| Staff-on-inmate sexual abuse | 0 | 0 | 0 | 0 |
| Total | 21 | 2 | 21 | 0 |

93. 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 | 9 | 0 | 9 | 0 |
| Staff-on-inmate sexual harassment | 0 | 0 | 0 | 0 |
| Total | 9 | 0 | 9 | 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.

94. 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 | 1 | 0 |
| Staff-on-inmate sexual abuse | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 0 | 1 | 0 |

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

| | Ongoing | Unfounded | Unsubstantiated | Substantiated |
|--------------------------------------|---------|-----------|-----------------|---------------|
| Inmate-on-inmate sexual abuse | 1 | 7 | 11 | 3 |
| Staff-on-inmate sexual abuse | 0 | 0 | 0 | 0 |
| Total | 1 | 7 | 11 | 3 |

Sexual Harassment Investigation Outcomes

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

96. 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 |

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

| | Ongoing | Unfounded | Unsubstantiated | Substantiated |
|---|---------|-----------|-----------------|---------------|
| Inmate-on-inmate sexual harassment | 0 | 1 | 6 | 2 |
| Staff-on-inmate sexual harassment | 0 | 0 | 0 | 0 |
| Total | 0 | 1 | 6 | 2 |

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

| | |
|--|--|
| 98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled: | 30 |
| 99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes? | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files) |
| Inmate-on-inmate sexual abuse investigation files | |
| 100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled: | 21 |
| 101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations? | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) |
| 102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations? | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) |

Staff-on-inmate sexual abuse investigation files

| | |
|--|---|
| 103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled: | 0 |
| 104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations? | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files) |
| 105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations? | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files) |

Sexual Harassment Investigation Files Selected for Review

| | |
|--|--|
| 106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled: | 9 |
| 107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes? | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files) |

Inmate-on-inmate sexual harassment investigation files

| | |
|--|---|
| 108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled: | 9 |
|--|---|

| | |
|---|--|
| <p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p> | <p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p> |
| <p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p> | <p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p> |
| <p>Staff-on-inmate sexual harassment investigation files</p> | |
| <p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p> | <p>0</p> |
| <p>112. 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>113. 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>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p> | <p>There was no allegation of staff-on-inmate sexual abuse or staff-on-inmate sexual harassment during the reporting period. The facility reported twenty-one (21) inmate-on-inmate sexual abuse allegations and nine (9) inmate-on-inmate sexual harassment during the 12-months preceding the audit. The facility provided all investigations for the auditor's review. The reviewed investigations were thorough and obtained all necessary documentation to determine outcomes.</p> |
|--|---|

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

| | |
|---|---|
| <p>115. 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.</p> | <p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p> |
|---|---|

Non-certified Support Staff

| | |
|---|---|
| <p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p> | <p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p> |
|---|---|

| | |
|--|----------|
| <p>a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:</p> | <p>3</p> |
|--|----------|

AUDITING ARRANGEMENTS AND COMPENSATION

| | |
|---|---|
| 121. Who paid you to conduct this audit? | <p><input type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p> |
| Identify the name of the third-party auditing entity | Diversified Correctional Services, LLC |

Standards

Auditor Overall Determination Definitions

- 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

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.

| | |
|---------------|---|
| 115.11 | Zero tolerance of sexual abuse and sexual harassment; PREA coordinator |
| | <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard 115.11:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act (pp. 1-30) 3. Policy 1-07-08.00 Prison Rape Elimination Act, 1-07-08.02 Prison Rape Elimination Act Coordinator (p. 3) 4. Cobb County Adult Detention Center Organizational Chart 2021-2022 5. PREA Brochures (English and Spanish) "End The Silence" 6. Cobb County Adult Detention Center Grievance Logs <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (2)</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Jail Commander <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.11 (a): The agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency's approach to preventing, detecting, and responding to such conduct.</p> <p>Cobb County Adult Detention Center is required to comply with all aspects of the Prison Rape Elimination Act of 2003 (Title 28 CFR Part 115); (PREA 115.11) (a). The PREA Program includes the approach to prevention, detection, responding and reports. The agency has identified sanctions for staff, contractor, or inmates for violating any agency sexual abuse or sexual harassment policy and the presumptive sanction for employees is dismissal/termination and banning contractors and volunteers from further contact with inmates and the facility, until the conclusion of an investigation. The ban is statewide, preventing the contractor or volunteer from entering any detention facility until an investigation is completed.</p> <p>115.11 (b): The agency shall employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.</p> <p>Policy 1-07-08.02 Prison Rape Elimination Act Coordinator (p. 3) the Jail Commander of the Cobb County Adult Detention Center has designated a PREA Compliance</p> |

Coordinator. The PREA Coordinator is a Major. The Facility's Organizational Chart identifies her as the PREA Compliance Coordinator. She has direct and unimpeded access to the Jail Commander. This was confirmed in an interview with the Jail Commander, the PREA Compliance Coordinator and through observations of interactions throughout the audit. The Jail Commander confirmed his complete support of the PREA Compliance Coordinator.

Cobb County Adult Detention Center is required to comply with the all aspects with the Prison Rape Elimination Act of 2003 (Title 28 CFR Part 115); (PREA 115.11) (a). The PREA Program includes the approach to prevention, detection, responding and reports. The agency has identified sanctions for staff, contractor, or inmates for violating any agency sexual abuse or sexual harassment policy and the presumptive sanction for employees is dismissal/termination and banning contractors and volunteers from further contact with inmates and the facility, until the conclusion of an investigation. The ban is statewide, preventing the contractor or volunteer from entering any detention facility until an investigation is completed.

115.11 (c): Where an agency operates more than one facility, each facility shall designate a PREA compliance manager with sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.

In response to the Pre-Audit Questionnaire:

Cobb County Adult Detention Center operates one facility and does not have a designated a PREA Compliance Manager. The PREA Coordinator stated during the interview that she has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.11 based upon documentation provided and interviews conducted.

Corrective Action: (None)

| 115.12 | Contracting with other entities for the confinement of inmates |
|--------|--|
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard 115.12:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act 3. Policy 1-07-08.17 Contracting with Other Entities (p. 30) 4. Review of Cobb County Adult Detention Center Website <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (2)</p> <ol style="list-style-type: none"> 1. Agency Contract Administrator 2. PREA Coordinator <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>The Pre-Audit Questionnaire indicates that the facility does contract for the confinement of confined persons. The Cobb County Adult Detention Center contracts for the confinement of offenders with Governmental Entities responsible for operating county and city jails.</p> <p>115.12 (a): The agency contracts for the confinement of its confined persons with private agencies or other entities, including other government agencies, shall include in any new contract or contract renewal the obligation to adopt and comply with the PREA standards. All of the contracts require contractors to adopt and comply with PREA standards. Cobb County Adult Detention Center Policy 1-07-08.17 Contracting with Other Entities (p. 30) requires:</p> <ol style="list-style-type: none"> 1. When contracting with law enforcement agencies, institutions, jails, or correctional facilities for the purpose of housing Cobb County inmates, the Sheriff's Office shall ensure the agency is in compliance with PREA standards. 2. When entering a new or renewing a confinement contract, the Sheriff's Office shall require that the contract includes the agency's obligation to adopt and comply with PREA standards. a) Shall include a provision for monitoring for compliance. <p>115.12 (b): Any new contract or contract renewal shall provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards.</p> <p>In response to the Pre-Audit Questionnaire:</p> <p>Currently, the Cobb County Adult Detention Center contracts with four (4) private</p> |

county or city entities. The Fulton County Sheriff's Office; City of Kennesaw Police Dept.; Marietta Police, Austell PD. These agencies' have an obligation to adopt and comply with PREA standards.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.12 based upon documentation provided and interviews conducted.

Corrective Action: (None)

| | |
|---------------|--|
| 115.13 | Supervision and monitoring |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard 115:13:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion (p 24) 3. Cobb County Adult Detention Center Staffing Plans 4. Cobb County Adult Detention Center Unannounced Rounds 5. Daily Post Rosters 6. Deviation of Staffing Form 7. Detention Critical Post 8. Master Duty Roster <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (3)</p> <ol style="list-style-type: none"> 1. Jail Commander 2. PREA Coordinator 3. Intermediate of High-Level Staff that conduct unannounced rounds. <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <ol style="list-style-type: none"> 1. Observations of Staffing Plan on two shifts. <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.13 (a): The agency shall ensure that each facility it operates shall develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration: (1) Generally accepted detention and correctional practices; (2) Any judicial findings of inadequacy; (3) Any findings of inadequacy from Federal investigative agencies; (4) Any findings of inadequacy from internal or external oversight bodies; (5) All components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated); (6) The composition of the inmate population; (7) The number and placement of supervisory staff; (8) Institution programs occurring on a particular shift; (9) Any applicable State or local laws, regulations, or standards; (10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and (11) Any other relevant factors.</p> |

Policy 1-07-08.13 Facility Staffing, Hiring and Promotion, requires each facility to develop a staffing plan addressing adequate staffing and deployment of video monitoring in an effort to protect offenders from sexual abuse. Additionally, the facilities develop a stratification plan that essentially provides a brief overview of the facility and the plan for housing the population served by this facility. Cobb County Adult Detention Center has developed and documented a staffing plan that provides for adequate levels of staffing to attempt to keep inmates safe. The staffing plan is documented by Cobb County Adult Detention Center.

115.13 (b): In circumstances where the staffing plan is not complied with, the facility documents and justifies all deviations from the plan.

Any deviation from the staffing plan shall be justified and documented.

Staffing levels then are essentially based on the mission of the facility, population served, security levels of offenders, special needs of offenders, programs, work details and the numbers of identified critical and non-critical posts. Critical posts are those that are so critical they must be manned 24/7. The facility may also have other posts that need to be staffed for optimum operational conditions but are non-critical posts that must be manned 24/7. Critical posts are needed for the optimal operation of the facility but non-critical posts and may be closed or "pulled" in order to staff critical posts. Some posts may be closed because their function has ceased at a given time of day or night.

115.13 (c): Whenever necessary, but no less frequently than once each year, for each facility the agency operates, in consultation with the PREA coordinator required by § 115.11, the agency shall assess, determine, and document whether adjustments are needed to: (1) The staffing plan established pursuant to paragraph (a) of this section. (2) The facility's deployment of video monitoring systems and other monitoring technologies; and (3) The resources the facility has available to commit to ensure adherence to the staffing plan.

The Sheriff's Office, in conjunction with the PREA Coordinator, shall annually assess, determine and document if adjustments should be made to the Staffing plan; deployment of video or monitoring technologies; and available resources to ensure adherence to the staffing plan.

115.13 (d): Each agency operating a facility shall implement 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. Such policy and practice shall be implemented for night shifts as well as day shifts. Each agency shall have a policy to prohibit 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.

The Sheriff's Office shall ensure that security protocols are in place that supports the prevention and detection of sexual abuse. Intermediate and upper-level supervisors shall conduct and document unannounced rounds during all shifts to identify and deter staff sexual abuse and sexual harassment. Staff members are prohibited from

alerting other staff members of said rounds unless such announcement is related to legitimate operational functions. Rounds shall be documented by use of a "Watch Tour System".

In the response to the PAQ which requires shift supervisors and duty officers to make unannounced rounds in all housing units and out-posts to better identify and deter sexual abuse and sexual harassment. The Deputy Jail Commander related rounds are unannounced, and staff shall not alert other staff members that rounds are occurring unless such announcement is related to the legitimate operational functions of the facility.

The interview with the Deputy Jail Commander indicated they conduct rounds at random times during their shift.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.13 based upon documentation provided and interviews conducted.

Corrective Action: (None)

| | |
|---------------|--|
| 115.14 | Youthful inmates |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard 115.14:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p.7) 3. Policy 2-02-05.00 Managing Juvenile and Youthful Offenders - 2-02-05.03 Housing Juvenile/Youthful Offender (p. 4) 4. Cobb County Adult Detention Center agency website, http://www.dcor.state.ga.us/ <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (1)</p> <p>Jail Commander</p> <p>Youthful Offenders (3)</p> <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <ol style="list-style-type: none"> 1. Observations of housing units <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.14 (a): A youthful inmate shall not be placed in a housing unit in which the youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared day-room or other common space, shower area, or sleeping quarters.</p> <p>Policy 2-02-05.03 Housing Juvenile/Youthful Offender (p. 4) C. Juvenile and youthful offenders housed at the facility shall be housed separately from adult offenders and shall be restricted by sight and sound from adult offenders.</p> <p>The facility prohibits placing youthful inmates in a housing unit in which a youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared day-room or other common space, shower area, or sleeping quarters.</p> <p>In the past 12 months, the number of housing units to which youthful inmates are assigned that provide sight and sound separation between youthful and adult offenders in day-rooms, common areas, showers, and sleeping quarters: 2</p> <p>In the past 12 months, the number of youthful inmates placed in SAME HOUSING</p> |

UNIT as adults at this facility: 0

115.14 (b): In areas outside of housing units, agencies shall either: (1) maintain sight and sound separation between youthful inmates and adult inmates, or (2) provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.

In areas of the facility where direct supervision is employed, the housing deputy shall ensure that movement of juvenile and youthful offenders is conducted in a manner that prohibits contact with adult offenders.

If movement outside the housing unit is required, the deputy shall contact the housing supervisor to arrange movement of the offender and ensure all routes of travel are cleared.

115.14 (c): Agencies shall make its best efforts to avoid placing youthful inmates in isolation to comply with this provision. Absent exigent circumstances, agencies shall not deny youthful inmates daily large-muscle exercise and any legally required special education services to comply with this provision. Youthful inmates shall also have access to other programs and work opportunities to the extent possible.

Juvenile and youthful offenders are entitled to the same rights and privileges (visitation, commissary, religious services, and recreation) as adult offenders. In exercising these rights and privileges, juvenile and youthful offenders shall be kept separate and apart from adult offenders. The Support Services Lieutenant shall ensure a separate schedule of events is maintained and enforced when supervising the activities of juvenile and youthful offenders.

Youthful inmates incarcerated in a Detention Facility shall not be housed or detained in involuntary segregation based solely on their age and/or the requirement to maintain separate from adult inmates by sight/sound unless exigent circumstances exist.

In the past 12 months, the number of youthful inmates who have been placed in isolation in order to separate them from adult inmates: 0

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.14 based upon documentation provided.

Corrective Action: (None)

| 115.15 | Limits to cross-gender viewing and searches |
|--------|--|
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard 115.15:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.06 Supervision & Monitoring (p 9) C. Cross-Gender Searches & Viewing 3. Policy 2-02-09.00 Transgender / Intersex Inmates 4. Cobb County Adult Detention Center Training Curriculum on Searches 5. Statement of Fact (no exigent circumstances) <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <ol style="list-style-type: none"> 1. Random Staff (17) 2. Random Confined Persons (21) 3. Transgender Confined Person (0) <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <p>Observed staff of the opposite sexual making announcements when entering living units.</p> <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.15 (a): The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.</p> <p>Cross gender strip and visual body cavity searches are prohibited. With the exception in exigent circumstances or when performed by medical personnel.</p> <p>In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of inmates: 0</p> <p>In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of inmates that did not involve exigent circumstances or were performed by non-medical staff: 0</p> <p>All random staff interviews corroborated the policy prohibiting cross gender searches absent emergent and exigent circumstances. Facility responses in the PAQ indicated cross-gender strip and cross-gender visual and body cavity searches of confined persons are prohibited and not conducted.</p> |

115.15 (b): As of August 20, 2015, or August 20, 2017 for a facility whose rated capacity does not exceed 50 inmates, the facility shall not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. Facilities shall not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.

Any cross gender pat-down search is prohibited. The facility does not permit cross-gender pat-down searches of female inmates, absent exigent circumstances.

The facility does not restrict female inmates' access to regularly available programming or other out-of-cell opportunities.

The number of pat-down searches of female inmates that were conducted by male staff: 0

The number of pat-down searches of female inmates conducted by male staff that did not involve exigent circumstances: 0

Policy stipulates the requirement of prohibiting cross-gender pat searches on female confined persons will not restrict them access to regularly available programming or other out-of-cell opportunities in order to comply with this provision. The facility reported in its PAQ response that confined persons are not restricted from programming or other out-of-cell activities.

The facility documents all cross-gender strip searches and cross-gender visual body cavity searches and shall document all cross-gender pat-down searches of female inmates.

The agency's PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act -1-07-08.06 Supervision & Monitoring (p 9) under section Limits to Cross-Gender Searches and Viewing, requires cross-gender visual body cavity searches and cross-gender pat searches of female confined persons be documented. During the Pre-onsite phase of the audit, the auditor requested documentation of exigent circumstances that may have permitted a cross-gender staff member to conduct a strip or body cavity search; and, of cross-gender staff conducting pat searches of female confined persons. The facility's response to the PAQ indicated only female staff conduct pat searches on female confined persons and all cross-gender pat searches performed due to exigent circumstances are required to be documented on an incident report form. The facility responded by indicating there were no cross-gender pat searches or strip or body searches conducted by correctional or medical staff and thus, there was no documentation to review.

115.15 (d): The facility shall implement policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an inmate housing unit.

Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.06 Supervision & Monitoring (p. 9), No authorized staff shall view any inmate while showering, performing bodily functions or changing cloths absent exigent circumstances or when such viewing is incidental to routine safety checks.

Policy stipulates facilities will enable confined persons to “shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks”. Included in the policy is a requirement for staff of the opposite gender to announce their present.

115.15 (d). The facility uploaded the Policy 1-07-08.00 Prison Rape Elimination Act policy (p. 11) in their response to the PAQ. Policy stipulates facilities will enable confined persons to “shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks”. Included in the policy is a requirement for staff of the opposite gender to announce their presence when entering a confined person’s housing unit.

The interviews with a random selection of staff related staff of the opposite sex announces themselves prior to entering housing areas. Random and targeted confined person interviews indicated staff announce themselves prior to entering their housing unit and all confined persons indicated they have never been naked in the presence an opposite gender staff member.

115.15 (e): The facility shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate’s genital status. If the inmate’s genital status is unknown, it may be determined 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.

Policy 2-02-09.00 Transgender / Intersex Inmates - 2-02-09.02 Transgender/Intersex (p. 3) G. Cross-gender frisk and strip searches are prohibited, unless exigent circumstances exists (i.e. inmate suspected of possessing a weapon).

1. Strip searches conducted solely to determine the gender of an inmate are prohibited.

2. A facility incident report shall be generated within OMS documenting the need (exigent circumstance) to conduct a frisk or strip search of a transgender by a staff member of the opposite sex.

3. Staff shall refer to additional directives in policy sections 2-02-07.00 Frisk Search / Pat Down and 2-02-08.00 Strip Searches of Arrestees (Inmates) related to frisk and strip searches of inmates.

The facility indicated in their response to the PAQ that they do not allow strip

searches or any searches in which confined persons would be exposed or asked to take off their clothing and, and zero searches were completed on transgender or intersex confined persons for the sole purpose of determining their genital status in the 12 months preceding the audit.

The agency shall train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

The facility had no confined person that identified as transgender that was housed at the facility for the auditor to interview.

115.15 (f): The agency shall train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

The facility indicated in their response to the PAQ that 100 percent of security staff have been trained to conduct cross-gender pat-down searches and searches of transgender and intersex confined persons, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Random interviews with staff indicated 100% received training on cross-gender pat-down searches and searches of transgender and intersex confined persons. A review of training documentation consisted of Cobb County Adult Detention Center's Annual Training Curriculum and training records. The records for PREA training did not indicate what specific training topics were addressed and the facility could not provide a curriculum supporting cross-gender or transgender/intersex searching. All staff indicated they received the training and described how to conduct transgender and intersex confined person pat searches, the auditor determined the practice has been institutionalized and staff would know what to do in the event a circumstance

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.15 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| <p>115.16</p> | <p>Inmates with disabilities and inmates who are limited English proficient</p> |
| <p>Auditor Overall Determination: Meets Standard</p> | |
| <p>Auditor Discussion</p> | |
| <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard 115.16:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.06 Supervision & Monitoring (pp 9 & 10) 3. Language Line Services (Interpretive Services) 4. Language Line Invoicing 2022-2023 5. Hotline Dialing Instructions English/Spanish 6. PREA Posters English/Spanish 7. Offender PREA Training Brochure English/Spanish <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (1)</p> <ol style="list-style-type: none"> 1. Agency Head (1) 2. Random Staff (17) 3. Confined Persons that were LEP (2) 4. Confined Persons with Physical Disabilities (2) 5. Confined Persons with Cognitive Disabilities (2) <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <ol style="list-style-type: none"> 1. PREA Posting 2. Hotline Dialing Instructions <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.16 (a). Cobb County Adult Detention Center’s written policy, Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.06 Supervision & Monitoring (pp 9 & 10) section D. Inmates with Limited Abilities or Limited English Proficient, requires the facility PREA Compliance Manager to ensure appropriate resources are available to confined persons with disabilities and those who are LEP so they may understand the facility policies regarding preventing, detecting, reporting and responding to sexual abuse and sexual harassment. The facility provided the auditor with the User’s Guide for Language Line Services who provides interpretive services for limited English proficient confined persons in making an allegation of sexual abuse or sexual harassment. The Agency Head Designee indicated all PREA related educational materials are available in formats for disabled or Limited-English Proficient confined</p> | |

persons. In addition to the PREA materials, the agency has a dedicated ADA Coordinator who also provides resources to disabled or LEP confined persons.

Eight (8) confined persons with disabilities or LEP were interviewed during the on-site portion of the audit; two (2) confined person with physical disabilities, two (2) LEPs, and two (2) with cognitive disabilities.

Two (2) LEP confined persons interviewed did not need a translator during interviews. All interviewed confirmed they had received PREA education.

115.16 (b). As noted in provision (a) of this standard, interview with the agency head related the agency has a contract with Language Line Services to communicate with LEP confined persons. English and Spanish PREA information and brochures are visibly posted throughout the facility and in housing units and are readily available for the confined persons.

115.15 (c). Cobb County Adult Detention Center written Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.06 Supervision & Monitoring (pp 9 & 10) section D. Inmates with Limited Abilities or Limited English Proficient addresses the facility's reliance on confined person interpreters, readers, or other types of confined person assistants. Cobb County Adult Detention Center does not rely on another confined person, only if exigent circumstances arise. Exigent circumstances include where any extended delay in obtaining an interpreter could compromise the confined person's safety, the performance of first responder duties, or the investigation of confined person allegations. All random staff interviews indicated they do not use a confined person to assist in translation. Policy is in place, and staff interviews support the non-use of any other confined person to translate, the auditor is convinced the practice has been institutionalized. The facility providing monthly invoicing from Language Line Services.

In the past 12 months, the number of instances where inmate interpreters, readers, or other types of inmate assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations: 0

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.16 based upon documentation provided and interviews conducted.

Corrective Action: None

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| 115.17 | Hiring and promotion decisions |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard 115.17:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion (pp 24 & 25) 3. Cobb County Adult Detention Center Employment Application 4. Employee Personnel Files (7) 5. Employee Personnel Audit File 6. Contractors and Volunteers List 7. Cobb County Adult Detention Center Background Checks on Employees, Contractors, Volunteers <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (1)</p> <ol style="list-style-type: none"> 1. Human Resources Staff <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.17 (a). The agency’s written Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion (pp 24 & 25) addresses this provision in detail and complies with the PREA Standards. No prospective employee, who may have contact with confined persons, is hired or contracted for services who have engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility or other institution defined in 42. USC 1997; 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; of who has been civilly or administratively adjudicated to have engaged in the activity described in the above.</p> <p>Specifically, each applicant prospective employees are asked if they have ever:</p> <p>Prior to hiring new employee, who may have contact with inmates, the agency shall:</p> <p>The Sheriff’s Office shall not hire or promote anyone who may have contact with inmates and shall not enlist the services of any contractor or vendor who may have contact with inmates who has: (PREA 115.17(a))</p> <ol style="list-style-type: none"> 1. Engaged in sexual abuse in a prison, jail lock-up, community confinement facility, juvenile facility or other institution; |

2. Been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force or coercion, or if the victim did not consent or was unable to consent or refuse; or

3. Been civilly or administratively adjudicated to have engaged in the activity described in this section.

115.16 (b). The agency's written Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion (pp 24 & 25) requires Cobb County Adult Detention Center to consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with confined persons. The interview with the HR Staff confirmed sexual harassment is taken into consideration prior to hiring anyone, employee or enlisting the services of contractors who may have contact with confined persons. The facility completes a Professional Reference Check form which asks if the applicant is under an internal investigation or has an active disciplinary action or adverse action. The form addresses Standard 115.17 as it relates to sexual abuse, but not sexual harassment.

Incidents of sexual harassment shall be considered in determining whether to hire or promote anyone, or to enlist the services of any contractor or volunteer who may have contact with inmates. (PREA 115.17(b))

115.17 (c). The agency's written Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion (p 25), requires a background investigation be completed on all prospective employees and volunteers prior to their start date and having contact with confined persons. The policy includes the requirement to 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. The facility makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse consistent with federal, state, and local law. The interview with the Human Resources Staff confirmed the facility completes a Professional Reference Check on each transfer from other correctional institutions to inquire as to any current or past disciplinary actions or investigation concerns. The auditor is confident the standard is being met.

In the past 12 months, the number of persons hired who may have contact with inmates who have had criminal background record checks: 196

In response to the PAQ the facility indicated (196) staff were hired within the past 12 months who required a background investigation and indicated 100% of staff had background checks conducted prior to their start date during this audit cycle. The auditor asked for and reviewed a random sampling of employment files during this audit cycle and determined background checks were performed on all staff as required. The facility's HR department provided a complete personnel files audit of all files with current background checks and recent staff training dates.

Cobb County Adult Detention Center requires the following regarding the hiring and

promotion process: 1) Applicants responding to the PREA related questions asked of all applicants and documented on the Employment Verification Form; 2) Applicants must pass a background check consisting of fingerprint checks, a check of the Georgia Crime Information Center and the National Crime Information Center; 3) Staff must pass an annual driver's license check. All staff must pass a background check every five years consisting of the GCIC and NCIC. Material omissions regarding misconduct or providing materially false information will be grounds for termination.

115.17 (d). The agency's written Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion (p 25) - H. Criminal history background checks shall be performed a criminal background investigation on all prospective contractors prior to having contact with confined persons.

Medical staff is contracted through Well Path, the auditor asked for and reviewed a random sampling of contractor/volunteer files during this audit cycle and determined background checks were performed on all contractors as required.

The interview with the facility's HR Staff indicated completing criminal background checks on all prospective contractors and volunteers is a confirmed practice for Cobb County Adult Detention Center facility.

At least every five (5) years for current employees and contractors who may have contact with inmates undergo background checks.

115.17 (e). The agency's written policy, Policy 1-07-08.00 Prison Rape Elimination Act, section 10, Hiring and Promotion Practices (pp. 13-15) requires a background investigation be completed on all employees and contractors who may have contact with confined persons every five years.

The facility indicated in their response to the PAQ that agency policy requires a criminal background check at least every five years for all staff and contractors, however, currently backgrounds are completed annually.

File documentation confirmed all employees had current backgrounds conducted within a one year period. The auditor is confident this practice has been institutionalized.

115.17 (f). The agency's written Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion F. (p 25) addresses this provision in detail and includes all required information pursuant to this provision. Standard Operating Procedure identifies the three specific PREA related questions as per provision (a) of this standard which are given to everyone prior to hire and having contact with confined persons; and, prior to being promoted. Everyone is expected to answer each question. Specifically, each person is queried if they ever:

1. Have engaged in sexual abuse and/or sexual harassment in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997).
2. Have been convicted of engaging or attempting to engage in sexual activity in the

community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or.

3. Have been civilly or administratively adjudicated to have engaged in the activity as described above.

Upon reviewing employee file documentation, the auditor confirmed these PREA questions are asked and answered by the then applicant. There were promotion files to review during this audit cycle. The interview with the facility's HR Staff indicated standard procedure at all Cobb County Adult Detention Center facilities. Employees, transfers, and those pending possible promotion are required to answer the questions and have another background check.

Further, the PREA policy (p. 12) stipulates facilities "shall also impose upon employees a continuing affirmative duty to disclose any such misconduct."

115.17 (g). The facility indicated in their response to the PAQ that material omissions regarding misconduct described in provision (a), or the provision of materially false information, shall be grounds for termination. The agency's written policy, 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion F. (p 25) states, Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

115.17 (h). The agency's written policy, 1-07-08.00 Prison Rape Elimination Act - 1-07-08.13 Facility Staffing, Hiring and Promotion I. (p 25) addresses this provision in detail and specifically states, unless prohibited by law, the Department shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work. The interview with the HR Staff indicated providing this information is not against the State of Georgia laws and is standard practice at all Cobb County Adult Detention Center facilities.

The agency shall provide information to other institutional employers, as requested, on substantiated allegations of sexual abuse or sexual harassment involving a former or current employee who is seeking employment with the requesting institution.

The interview with the HR Staff indicated when asked they provide this information via the Professional Reference Check Form.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.17 based upon documentation provided and interviews conducted.

Corrective Action: None

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| 115.18 | Upgrades to facilities and technologies |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard 115.18:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.18 Upgrades to Facilities and Technology (p 30) 3. New Cameras Building B <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (1)</p> <ol style="list-style-type: none"> 1. Jail Commander <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.18 (a). In the response to the PAQ the facility reported they have not engaged in any substantial expansion or modification of its facility since the last PREA audit, only regular maintenance to the roof and HVAC system. Interview with the Jail Commander indicated they have not had modifications to the Cobb County Adult Detention Center. This provision is not applicable since the facility has had no expansions or modifications to their facility.</p> <p>115.18 (b). In response to the PAQ, the facility indicated they have installed cameras/ video monitoring installed cameras in Building B that provides around the clock surveillance system since the last PREA Audit conducted in 2021. The interview with the Jail Commander also indicated the new installation and updated to their electronic technology has occurred during this audit period.</p> <p>The open dorms of Building B have been retrofitted with video surveillance systems to match the standards throughout the rest of the facility, dorms L, M, O, and R.</p> <p>The facility in compliance with PREA Provision with based upon documentation provided and interviews conducted. Current operations and practices meet the requirements of PREA Standard 115.18.</p> <p>Corrective Action: (None)</p> |

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| 115.21 | Evidence protocol and forensic medical examinations |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 19) 3. PREA Investigation Protocol, 4. Procedure for SANE Evaluation/Forensic Collection 5. Sexual Abuse/Sexual Harassment Rape Elimination Act (PREA) Education Acknowledgement Statement. 6. Procedure for SANE Nurse Evaluation/Forensic Collection <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (2)</p> <ol style="list-style-type: none"> 1. PREA Compliance Manager 2. SAFE/SANE staff 3. Random Staff (17) 4. Targeted Confined person Who Reported a Sexual Abuse (3) <p>115.21 (a). In response to the PAQ, the facility indicated they conduct both administrative and criminal investigations of alleged sexual assault and sexual harassment. Allegations that appear to be criminal in nature are referred to the Cobb County Adult Detention Center Investigative Division. Agency Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 - Investigations (p. 19) describes the agency's expectations regarding evidence protocols and forensic examinations. Facilities are required to follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The facility also reported its agency, Cobb County Adult Detention Center, is responsible for conducting criminal sexual abuse investigations (including confined person-on-confined person sexual abuse or staff sexual misconduct).</p> <p>The interviews with a random staff confirmed all understood first responder protocols of gathering usable physical evidence, including separating the victim and abuser, securing the scene, ensuring the victim and abuser do not shower, wash or brush their teeth; and correctly identified the staff member responsible for conducting sexual abuse allegations. They also reported the information is confidential in nature and would not disclose any information to those without need-to-know basis.</p> <p>115.21 (b). According to its PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act (P. 19), Cobb County Adult Detention Center's response to sexual assault follows the US Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents" dated</p> |

April 2013, or the most current version. In response to the PAQ, the facility reported it does house youthful confined persons and accept adults between the ages of 17 and 80 plus years so the protocol requirement to be developmentally appropriate for youth is applicable in determining compliance of this provision.

115.21 (c). Per PREA Policy 1-07-08.00 Prison Rape Elimination Act (p. 16) Cobb County Adult Detention Center offers all victims of sexual abuse access to forensic medical examinations at no cost to the confined persons. These examinations are performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANE) as required.

The number of forensic medical exams conducted during the past 12 months: 2

The number of exams performed by SANES/SAFEs during the past 12 months: 2

The number of exams performed by a qualified medical practitioner during the past 12 months: 0

The interview with the SAFE/SANE staff at Cobb County Adult Detention Center's Sexual Assault Response Team confirmed this information by indicating they are and do have SAFE/SANE staff responsible for conducting forensic examinations for all individuals, including the Cobb County Adult Detention Center confined persons. Interviews and the

115.21 (d). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (p 22), the agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available, the agency makes available a qualified staff member to serve as an advocate for victims of sexual assault. The facility documents attempts to secure services from rape crisis centers. The facility has a MOU with YWCA of Northwest Georgia or LIVESAFE Resources a community-based advocate service.

The Interview with the PREA Compliance Manager confirmed the facility utilizes an outside advocacy for victims of sexual assault.

115.21 (e). Per PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act (p. 15) Cobb County Adult Detention Center offers "a victim advocate to confined persons alleging sexual abuse/sexual harassment upon request" by the confined person.

The auditor finds the facility in compliance with PREA Provision 115.21 (e) based upon documentation reviewed and interviews conducted.

115.21 (f). In response to the PAQ, the agency is responsible for investigating allegations of sexual abuse or sexual harassment, as such, provision (f) is not applicable in determining compliance with Standard 115.21.

115.21 (g). For purposes of this audit, this auditor is not required to make a compliance determination for provision (g) of this standard.

115.21 (h). For the purposes of this section, a qualified agency staff member or a

qualified community-based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

Victim advocates from the community used by the facility shall be pre-approved through the appropriate screening process and subject to the same requirements as contractors and volunteers who have contact with offenders.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.21 based upon documentation provided and interviews conducted.

Corrective Action: (None)

| 115.22 | Policies to ensure referrals of allegations for investigations |
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| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 19) 3. Cobb County Adult Detention Center Website referencing agency PREA Policy <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (2)</p> <ol style="list-style-type: none"> 1. Investigative Staff 2. Jail Commander <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.22 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 19) "All reports of sexual abuse or sexual harassment will be considered allegations and will be investigated.</p> <p>All allegations of sexual abuse and sexual harassment shall be promptly, thoroughly and objectively investigated.</p> <p>In the past 12 months, the number of allegations resulting in an administrative investigation: 2</p> <p>In the past 12 months, the number of allegations referred for criminal investigation: 31</p> <p>The interview with the Jail Commander confirmed administrative investigations are completed on all allegations of sexual abuse and sexual harassment; allegations that are criminal in nature are investigated by the GBI. These investigations are completed by the facility Sheriff's Office Inspectional Services and all incidents are reviewed by the facility leadership, as well as our PREA Coordinator's office.</p> <p>The auditor reviewed the administrative investigations and determined they are completed timely and was objective.</p> <p>115.22 (b). Policy 1-07-08.00 Prison Rape Elimination Act (p. 19) Investigations of sexual abuse shall be conducted by members of the Sheriff's Office Criminal Investigative Section or an outside agency with the legal authority to conduct criminal investigations.</p> |

Allegations of sexual harassment shall be investigated by a member of the Sheriff's Office Inspectional Services Section or other staff member as designated by the Sheriff.

The interview with the investigator indicated all allegations that are potentially criminal in nature are referred to the Georgia Bureau of Investigations.

115.22 (c). Cobb County Adult Detention Center conducts its own criminal investigations. All allegations that are potentially criminal in nature are referred to the Georgia Bureau of Investigations.

115.22 (d). For purposes of this audit, this auditor is not required to make a compliance determination for provision (d) of this standard.

115.22 (e). For purposes of this audit, this auditor is not required to make a compliance determination for provision (e) of this standard.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.22 based upon documentation provided and interviews conducted.

Corrective Action: None

115.31 Employee training

Auditor Overall Determination: Meets Standard

Auditor Discussion

In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:

1. Cobb County Adult Detention Center Pre-Audit Questionnaire
2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.14 Staff, Contractor & Volunteer Training (p 26)
3. Staff Training Records
4. Cobb County Adult Detention Center PREA Training Roster
5. PREA Curriculum

In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:

1. Random Staff (17)

The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):

115.31 (a). Per Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.14 Staff, Contractor & Volunteer Training (p 26) address all the staff training requirements relative to this standard. The auditor reviewed the policy and determined it contains all required training topics to satisfy this standard provision. The interviews with a random of staff indicated 100 percent received the required PREA training and training documentation supports all staff have received this training. The auditor reviewed in-service training rosters which included PREA as a training topic.

115.31 (b). The Policy 1-07-08.00 Prison Rape Elimination Act (p. 26) in part states, "In-service training shall include gender specific reference and training to staff as it relates to the specific population supervised. Staff members transferring into a facility of different gender from prior institution shall receive gender-appropriate training. Cobb County Adult Detention Center houses both male and female confined persons. In response to the PAQ, the facility indicated the training is tailored to the gender of the confined persons at Cobb County Adult Detention Center which is male confined persons. Staff training files indicate training is geared towards male and female confined persons.

115.31 (c). The Policy 1-07-08.00 Prison Rape Elimination Act (p 26) requires all employees to attend training annually. Review of staff training records confirmed all staff has received PREA training as required. Provision (c) requires PREA refresher training every two years and the facility's practice is to provide comprehensive PREA training on an annual basis which substantially exceeds the requirements of this provision.

Each employee shall receive refresher training at a minimum of every two (2) years

to ensure employees are aware of the agency's sexual abuse and sexual harassment policies.

115.31 (d). The auditor reviewed training records that contain verification and signatures indicating they understand the PREA training they received. Staff understands the Department's zero-tolerance for sexual abuse of confined persons. The auditor reviewed a sampling of signed forms and determined them compliant.

The auditor has determined current operations and practices exceed the requirements of PREA Standard 115.31 based upon documentation provided and interviews conducted.

Corrective Action: None

115.32 Volunteer and contractor training

Auditor Overall Determination: Meets Standard

Auditor Discussion

In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:

- 1. Cobb County Adult Detention Center Pre-Audit Questionnaire
- 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.14 Staff, Contractor & Volunteer Training (p 26)
- 3. Training Curriculum
- 4. Training Verification - Volunteers and Contractors

In order to decide compliance determination, the following person was interviewed, and the following interview finding were considered:

Specialized Staff:

- 1. Contractor (2)
- 2. Volunteer (0)

The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):

115.32 (a). The Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.14 Staff, Contractor & Volunteer Training (p 26) addresses volunteer and contractor training requirements relative to this standard. Participation in the training is documented through volunteer and contractor signature or electronic verification and will indicate that the volunteer and contractor understood the training they have received by signing Attachment 1, Sexual Abuse/Sexual Harassment Prison Rape Elimination Act (PREA) Education Acknowledgement Statement. The auditor reviewed four (4) files and found the appropriate documentation in place to satisfy this provision.

In the response to the PAQ, the facility indicated there were (263) contractors that had contact with confined persons within the past 12-months prior to the audit.

By definition from the PREA Resource Center, a person who may have contact with confined persons is an individual, "within the scope of that person's official or unofficial duties or privileges, it is reasonably foreseeable that the person will have physical, visual, or auditory contact with a confined person over any period of time." Volunteers and contractors fall under that category.

Formal and informal Interviews with contractors indicated they received the same training as all staff and sign the PREA Acknowledge Statement; all understood the agency's zero tolerance policy on sexual abuse and sexual harassment.

115.32 (b). The Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.14 Staff, Contractor & Volunteer Training (pp 26-27) addresses volunteer and contractor

training requirements relative to this standard. Participation in the training is documented through volunteer and contractor signature or electronic verification and will indicate that the volunteer and contractor understood the training they have received by signing Attachment 1, Sexual Abuse/Sexual Harassment Prison Rape Elimination Act (PREA) Education Acknowledgement Statement. The auditor reviewed four (4) files and found the appropriate documentation in place to satisfy this provision. (pp. 26-27) in part states, "The level and type of training provided to volunteers and contractors shall be based on the services they provide and the level of contact they have with confined persons, but all volunteers and contractors who have contact with confined persons shall be notified of our zero- tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents." Further, the policy stipulates that participation in the training is documented through volunteer and contractor signature or electronic verification and will indicate that the volunteer and contractor understood the training they have received by signing Attachment 1, Sexual Abuse/Sexual Harassment Prison Rape Elimination Act (PREA) Education Acknowledgement Statement. The auditor reviewed four files and was provided additional documentation verifying that all categories of staff receive the required training to satisfy this provision.

115.32 (c). The auditor reviewed documentation for four (4) contractors who received PREA training, thus ensuring the facility maintains documentation confirming that volunteers and contractors understand the training they received by way of signature on the agency's Training Roster form that they received and understood the training. Participation in the training is documented through volunteer and contractor signature or electronic verification and indicates that the volunteer and contractor understood the training they have received. The forms are maintained in the volunteer/contractor training files. The auditor reviewed four (4) files and found the appropriate documentation in place to satisfy this provision.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.32 based upon documentation provided and interviews conducted.

Corrective Action (None)

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| 115.33 | Inmate education |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.03 Inmate Education (p 4) 3. Confined person Files (25) 4. Confined person Awareness and Education Brochures (Spanish and English) 5. Cobb County Adult Detention Center Confined person Handbook, (English and Spanish) 6. PREA Brochures English and Spanish 7. PREA Acknowledgement Statements/Assessment and OMS System 8. Language Line Services <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (1)</p> <ol style="list-style-type: none"> 1. Intake staff 2. Random Confined Persons (21) 3. Targeted Confined Persons with Cognitive Disability (2) 4. Targeted Confined Persons with Physical Disability (2) 5. Targeted Confined Persons who were LEP (2) <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <ol style="list-style-type: none"> 1. Observations of prominently posted PREA materials in housing units and common areas. 2. Intake Screening booking process/confined person's reviewing PREA Video. <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.33 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.03 Inmate Education (p 4) requires notification of the Cobb County Adult Detention Center's zero- tolerance policy for sexual abuse and harassment and information on how to report an allegation at the receiving facility be provided to every confined person upon arrival to the facility.</p> <p>A. During the inmate booking process, Inmates shall be provided with the following information pertaining to the Prison Rape Elimination Act.</p> <ol style="list-style-type: none"> 1. Explanation of the zero-tolerance policy regarding sexual abuse, sexual assault, sexual misconduct and sexual harassment. 2. Information on how to report incidents or suspicions of sexual abuse, sexual |

assault, sexual misconduct and sexual harassment.

In response to the PAQ, the facility reported (19,887) confined persons were orientated at Cobb County Adult Detention Center in the 12 months preceding the audit and 100% received the facility's information on its zero-tolerance policy regarding sexual abuse and sexual harassment. The random confined person interviews confirmed 100% received the zero-tolerance information on sexual abuse and sexual harassment and how to report when they first arrived at the facility. The interviews with intake staff confirmed during the intake process the facility provides PREA information explaining the Cobb County Adult Detention Center's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment both verbally and in writing. They receive a comprehensive PREA brochure and a confined person handbook which details PREA and reporting mechanisms.

115.33 (b). The facility's response to the PAQ indicated (19,887) confined persons were admitted to Cobb County Adult Detention Center during the past 12 months for a stay of 30 days or more. 100% of those confined persons received comprehensive PREA education on their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake.

Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.03 Inmate Education (p 4) states:

B. Within thirty (30) days of processing into the Detention Facilities, inmates shall be provided with education, either in person or via video, on the Prison Rape Elimination Act that includes:

1. The inmate's right to be free from sexual abuse, sexual assault, sexual misconduct and sexual harassment.
2. The inmate's right to be free from retaliation for reporting such behavior/acts; and.
3. The agency's sexual abuse, sexual assault, sexual misconduct and sexual harassment response policy.

Cobb County Adult Detention Center provides PREA education/refresher education to all confined persons who are transferred to their facility, regardless of where they transferred from, within 30 days of intake as stated in their PREA policy (p 4). The auditor's review of confined person files confirmed all contained a signed acknowledgment they were given a copy of the confined person handbook which contains comprehensive PREA information.

The number of those inmates admitted during the past 12 months (whose length of stay in the facility was for 30 days or more) who received comprehensive education on their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake: (4555)

Random interviews with confined persons confirmed 100% received comprehensive PREA education on their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and

procedures for responding to such incidents within 30 days of intake. Interviews with intake staff confirmed confined persons receive this information during the booking or within 30 days of intake.

115.33 (c). Cobb County Adult Detention Center Policy 2-03-01.00 Classification of Inmates (p 1) states: Employ a comprehensive risk assessment to identify potential predatory behavior, susceptibility of victimization, and other individual risks that may threaten the safety of staff and other inmates.

PREA education/refresher education to all confined persons who are transferred to their facility, regardless of where they transferred from as evidenced through file documentation and interviews. In response to the PAQ, the facility indicated there were no confined persons transferred to their facility who have not received PREA training.

Interviews with intake staff indicated their practice is to provide PREA information upon arrival, including the facility's zero-tolerance stance on sexual abuse and sexual harassment, and a more detailed PREA education process during orientation for all new arrivals.

The auditor finds the facility in compliance with PREA Provision 115.33 (c) based upon documentation provided and interviews conducted.

115.33 (d). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.03 Inmate Education (p 4) states: Education shall be provided in formats accessible by all inmates, including those who have a limited understanding of English, limited reading skills, hearing impaired, visually impaired or otherwise disabled.

According to the policy, to ensure effective communication with those confined persons who are hearing impaired, Cobb County Adult Detention Center will provide hearing aids and services free of charge. Services include qualified sign language interpreters and oral translators through Language Line Services.

For confined persons who are Limited English Proficient Cobb County Adult Detention Center provides interpretive services through several means, including interpretive services, and English and Spanish PREA posters and brochures.

The Cobb County Adult Detention Center has a contract with Language Line Services to provide translation service to confined persons that do not speak English.

115.33 (e). The facility maintains documentation of confined person participation in PREA education sessions. All PREA education documents that facility case management staff discusses with and provide confined persons are signed and dated by both staff and confined person. Documents include the Confined person receipt of PREA training, which includes receipt of the confined person handbook. All confined persons also sign an acknowledgement on the risk assessment; this information is also documented in the OMS System. The auditor review of the confined person files confirmed all contained the appropriate forms and signatures of receipt.

115.33 (f). The facility ensures key information about Cobb County Adult Detention Center PREA policies is continuously and readily available and/or visible through posters, brochures and confined person handbooks. The auditor observed that facility practice allows for each confined person to sign for and retain a copy of the confined person handbook and PREA brochures. During the site review, the auditor observed English and Spanish PREA hotline posters prominently displays in the facility and in the housing units.

PREA education was confirmed by file documentation reviewed, and intake staff interviewed.

PREA education, the auditor is confident this practice has been institutionalized.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.33 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.34 | Specialized training: Investigations |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 18) 3. Training Records of Investigative Staff 4. NIC Training E-Course, "Investigating Sexual Abuse in a Confinement Setting" (27) <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (1)</p> <ol style="list-style-type: none"> 1. Investigator <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.34 (a). Per the agency's Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 18) specialized training is a requirement for staff conducting sexual abuse and sexual harassment investigations in confinement settings. As reported in the PAQ, the facility conducts administrative investigations that do not rise to the level of potentially criminal in nature. Potentially criminal allegations are referred to the Georgia Bureau of Investigations for investigation. The interview with investigative staff confirmed receiving specialized training. Review of investigative staff training files confirmed certifications of completion for PREA: "Investigating Sexual Abuse in a Confinement Setting" which was presented online by the National Institute of Corrections.</p> <p>115.34 (b). Training document review and the interview with investigative staff who received training on sexual abuse investigations confirmed the training included the following topics:</p> <ul style="list-style-type: none"> - Techniques for interviewing sexual abuse victims. - Proper use of Miranda and Garrity warnings. - Sexual abuse evidence collection in confinement settings. - The criteria and evidence required to substantiate a case for administrative action or prosecution referral. <p>The auditor verified through the NIC website that Investigating Sexual Abuse in a Confinement Setting contained required topics pursuant to 115.34 (b) and review of the investigative staff training file documented a certification of completion for "Investigating Sexual Abuse in a Confinement Setting".</p> |

115.34 (c). Review of investigative staff training files for investigators at Cobb County Adult Detention Center that is also the PREA Compliance Coordinator, confirmed the certification of completion for “Investigating Sexual Abuse in a Confinement Setting”. The facility maintains documentation supporting the investigator have completed the required specialized training in conducting sexual abuse investigations.

The number of investigators currently employed who have completed the required training: (27)

115.34 (d). For purposes of this audit, this auditor is not required to make a compliance determination for provision (d) of this standard.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.34 based upon documentation provided and interviews conducted.

Corrective Action: (None)

| 115.35 | Specialized training: Medical and mental health care |
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| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (p 22-23) 3. Training Documentation - Medical and Mental Health Staff NIC Certificates <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (2)</p> <ol style="list-style-type: none"> 1. Medical Staff 2. Mental Health Staff <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.35 (a) Policy 1-07-08.00 Prison Rape Elimination Act policy (P. 23), stipulates in part, Cobb County Adult Detention Center medical staff contracted through Well Path who have contact with confined persons will receive Specialized Training PREA Medical and MH Standards curriculum. Additionally, they are required to attend are required to attend annual PREA in-service training.</p> <p>In response to the PAQ the facility indicated medical and mental health staff at the facility and 100 percent received their required training. The interview with medical and mental health staff indicated they received specialized training as well as, attend annual training provided by the facility. Specialized training contains information on:</p> <ul style="list-style-type: none"> - How to detect and assess signs of sexual abuse and sexual harassment. - How to preserve physical evidence of sexual abuse. - How to respond effectively and professionally to victims of sexual abuse and sexual harassment. - How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. <p>The auditor verified through the required topics pursuant to 115.35 (a) and review of training documentation confirmed all had the required specialized and annual training.</p> <p>115.35 (b) The interview with medical staff confirmed they do not conduct forensic examinations at the facility and all forensic examinations are conducted at local hospital. The facility does not conduct forensic examinations. If there was a sexual</p> |

assault at this facility, the medical staff at Cobb County Adult Detention Center would not conduct the forensic examination but would perform a physical examination to determine the extent of the injuries. The forensic examination would be conducted by the contracted SANE on-site or at the local hospital emergency room depending upon the injuries the confined person incurred. The interviewee indicated medical staff are required to complete specialized training.

115.35 (c) In responses to the PAQ, the facility reported it maintains documentation that medical and mental health practitioners have received specialized training. A review of training documentation confirmed medical and mental health complete position-specific training.

115.35 (d) Medical and mental health staff receives new-hire training and annual in-service training as any other Cobb County Adult Detention Center employee. Training includes recognizing signs and symptoms of sexual abuse, first responding as a non-uniformed staff, and how to report allegations of sexual abuse and sexual harassment, including how and to whom to report and following up with written statements. Medical staff is trained in annual in-service training on how to respond to allegations and how to protect the evidence from being compromised or destroyed. A review of training files confirmed medical and mental health personnel, whether employee, contractor or volunteer acknowledge receiving training on Sexual Abuse and Sexual Harassment.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.35 based upon documentation provided and interviews conducted.

Corrective Action: (None)

| 115.41 | Screening for risk of victimization and abusiveness |
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| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.04 Risk Assessment for Sexual Victimization or Abusiveness (pp 5-6) 3. PREA Risk Screening (Assessment and Reassessments) 4. Confined persons classification (classification board) <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (3)</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Staff who conduct Risk Screening 3. Random Confined Persons (21) <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <p>Observation of the Initial Intake PREA process (N/A) Observation of secured records room.</p> <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.41 (a). Per Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.04 Risk Assessment for Sexual Victimization or Abusiveness (pp. 5-6), all confined persons are required to be assessed during intake screening and upon transfer to another facility for their risk of being sexually abused by other confined persons or sexually abusive toward other confined persons.</p> <p>All inmates processing into the Detention Facilities shall be evaluated for their risk of being sexually abused, sexually assaulted or sexually harassed by other inmates or for their risk of being sexually abusive or harassing towards other inmates.</p> <p>The interview with the staff member, who is responsible for conducting risk assessments, indicated they are conducted on all incoming confined persons. The interviews with Random Confined Persons some confirmed received a risk assessment upon arrival to the facility. Some Confined Persons could remember being asked the questions on the risk screening.</p> <p>115.41 (b). Per Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.04 Risk Assessment for Sexual Victimization or Abusiveness (pp. 5-6), stipulates risk</p> |

screening will be conducted within 72 hours of arrival at the facility. The facility reported in its response to the PAQ that (4523) confined persons were admitted to the facility for over 72-hours which equated to 100% of the population who received screening for sexual victimization or sexual abusiveness during the 12 months prior to the audit.

The auditor interviewed random confined persons of which all nine indicated they received a risk assessment either the day they arrived or the day after. The auditor reviewed twenty-one (21) confined person files for those admitted to the facility within the past 12-months. All files had documentation supporting a risk assessment was completed. The agency utilized an electronic program, OMS, to complete risk assessments.

The facility provided initial assessments and reassessments for review; all were compliant with the standard.

The auditor has determined that the practice of conducting risk assessments within 24 hours has been institutionalized.

115.41 (c). The facility provided a copy of its PREA Screening Tool used to screen and assess risk levels of victimization and abusiveness in the PAQ. The auditor finds the screening tool to be an objective instrument that allows for staff to appropriately assess risk levels. Risk levels for sexual victimization or sexual abusiveness is based on a scoring system determined from the answers provided by the confined person, thus, making it an objective instrument.

Evaluation shall be conducted using an established, objective screening instrument which shall be maintained in the inmate's file.

Responses to screening questions shall only be disseminated to those individuals with a legitimate reason to know (medical or mental health staff, safety concerns, and classification).

Staff shall review and update the initial risk assessment on any Inmate being transferred to another facility to determine the inmate's risk of being sexually abused, assaulted or harassed by other inmates or their risk of being sexually abusive or harassing towards other inmates.

The auditor finds the facility in compliance with PREA Provision 115.41 (c) based upon interviews conducted and documentation provided.

115.41 (d). The facility provided a copy of its PREA Screening Tool used to screen and assess risk levels of victimization and abusiveness in the PAQ. The PREA Screening Tool considers the following information, consistent with the requirements of provision (d) of this standard confined person.

- Whether the confined person has a mental, physical, or developmental disability.
- The age of the confined person.
- The physical build of the confined person.
- Whether the confined person has previously been incarcerated.

- Whether the confined person's criminal history is exclusively non-violent.
- Whether the confined person has prior convictions for sex offenses against an adult or child.
- Whether the confined person is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming.
- Whether the confined person has previously experienced sexual victimization.
- Whether the confined person is a former victim of institutional (prison or jail) rape or sexual assault.
- The confined person's own perception of vulnerability.

Interview with one staff member who conducts risk screening indicated Cobb County Adult Detention Center has a standard PREA Victim/Sexual Aggressive Classification Screening Questionnaire with 14 questions and/or statements for confined persons that require a yes or no response that is utilized during intake of new or transferred confined persons.

There were no PREA intake risk screenings during the onsite visit for the auditor to observe. The facility's mission does not include detaining confined persons solely for civil immigration purposes.

115.41 (e). The facility provided a copy of its PREA Screening Tool used to screen and assess risk levels of victimization and abusiveness in the PAQ. The PREA Screening considers the following information, consistent with the requirements of provision (e) of this standard:

The PREA Screening Tool additionally asks the following questions:

- Whether the confined person has a past history of institutional (prison or jail) sexually aggressive behavior?
- Whether the confined person has a history of sexual abuse/sexual assault towards others (adult and/or child)?
- Whether the confined person's current offense sexual abuse/sexual assault toward others (adult and/or child)?
- Whether the confined person has a prior conviction(s) for violent offenses?

An interview with staff responsible for conducting intake and risk screening verified the information on the screening tool and that these questions are asked of each new arrival.

115.41 (f). Per policy, Policy 1-07-08.00 Prison Rape Elimination Act (p. 5) in part states, "Confined persons whose risk screening indicates a risk for Victimization or abusiveness shall be reassessed whenever warranted due to an incident, disclosure or allegation of sexual abuse or harassment and also for all confined persons, within 30 days of arrival at the institution." The facility reported in the PAQ fifty (4555) confined persons entered the facility within the past 12-months with lengths of stay in excess of 30 days and 100% were reassessed.

The interview with staff responsible for conducting risk assessments indicated confined persons are reassessed within 30 day of the initial assessment. Interviews

with twenty-one (21) random confined persons confirmed reassessment are conducted within 30 days of the initial assessment. The auditor reviewed documentation of PREA Risk Screenings from the OMS database, and determined confined persons were reassessed no later than 30 days of arrival to the facility.

The auditor has determined that the practice of conducting reassessments for risks of sexual victimization or aggressiveness within 30 days of confined persons' arrival to the facility has been institutionalized.

115.41 (g). Per policy, Policy 1-07-08.00 Prison Rape Elimination Act (p. 24) in part states, "Confined persons whose risk screening indicates a risk for Victimization or abusiveness shall be reassessed whenever warranted due to an incident, disclosure or allegation of sexual abuse or harassment and also for all confined persons, within 30 days of arrival at the institution."

The auditor interviewed staff responsible for conducting risk assessments who indicated reassessments are conducted a reassessment; including, when it is necessary due to a referral, request, incident of sexual abuse, or receipt of additional information which may have an impact on a confined person's risk of sexual victimization or abusiveness. The interviews with twenty-one (21) random confined persons confirmed they were reassessed within 30 days of arriving at the facility.

The auditor reviewed the PREA assessment tool which is also used for reassessments. There is no differentiation between the initial assessment and reassessment forms utilized in OMS. There is no indication on the form to indicate the reason for the reassessment, be it, routine 30-day, due to a referral or request, an incident of sexual abuse or receipt of additional information which may affect a confined person's risk level. Counseling staff document the reasons in OMS using Case Notes.

Documentation, interviews, and policy support the reasons for reassessments and therefore, the auditor finds the facility in compliance with PREA Provision

115.41 (g) Based upon interviews conducted and documentation provided.

115.41 (h). Per policy, Policy 1-07-08.00 Prison Rape Elimination Act (p. 6) in part states, "If an confined person chooses not to respond to questions relating to his or her level of risk, he or she may not be disciplined." The auditor will recommend the facility amends its policy to include specific language related to this standard. Most notably that confined persons will not be disciplined for refusing to answer or for not disclosing completed information in response to the following questions:

- Whether or not the confined person has a mental, physical, or developmental disability.
- Whether or not the confined person is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming.
- Whether or not the confined person has previously experienced sexual victimization.
- The confined person's own perception of vulnerability.

The auditor interviewed one (1) staff responsible for conducting risk assessments who

indicated confined persons are not disciplined for not answering the questions, but are encouraged to answer honestly.

115.41 (i). Per policy, Policy 1-07-08.00 Prison Rape Elimination Act (p. 6) in part states, "If any information related to sexual victimization or abusiveness, including the information entered into the comment section of the Intake Screening Form, is limited to a need-to-know basis for staff, only for the purpose of treatment, security, management, and classification decisions.

The auditor interviewed the PREA Coordinator who stated each Jail Commander determines who has access to the confined person's risk assessment. Typically, the access will be granted to counselors, mental health professionals, and facility executive staff members. Although there is limited access to the details of the risk assessment, their overall score (victim, aggressor, both or neither) is available to all staff to ensure they have the necessary information to make housing, program and bed assignments. The interviews with the PCM and staff who conduct risk screening indicated there is limited access for privacy concerns.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.41 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.42 | Use of screening information |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (pp 7 - 8) 3. Policy 2-02-09.00 Transgender / Intersex Inmates 4. PREA Screening Tools 5. Confined person Files <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (3)</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. PREA Compliance Coordinator 3. Staff who conduct Risk Screening 4. Transgender/Intersex/Bi-Sexual/Gay/Lesbian Confined persons (4) <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <p>Confined person classification board/ housing/cellmate assignment.</p> <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.42 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p. 7) requires the agency to use information obtained from the risk screening process in making housing, and program assignments.</p> <ol style="list-style-type: none"> 1. Inmates at high risk of being sexually victimized shall be separated from those at a high risk of being sexually abusive. <p>B. When making a housing or program assignment, staff shall consider the inmate's health and safety, in addition to the security of the facility and safety of staff.</p> <p>115.42 (b). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.04 Risk Assessment for Sexual Victimization or Abusiveness (p 5) Facilities are required by Policy to make individualized determinations about how to ensure the safety of each confined person. The policy also requires that confined persons at high risk for sexual victimization will not be placed in involuntary segregated housing unless an assessment of all available alternatives have been made and there is no alternative means of separation from likely abusers. If an assessment cannot be made</p> |

immediately the confined person may be held in involuntary segregation for no more than 24 hours while completing the assessment. The placement and justifications for placement in involuntary segregation must be noted in OMS.

The interview with staff that performs risk assessments indicated the agency/facility uses information from screening to make informed decisions on housing, bed, work, education and program assignments with the goal of keeping those at high risk of being sexually victimized from those at high risk of being sexually abusive.

115.42 (c). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p. 7) states: When determining housing and program assignments of transgender and intersex inmates, staff shall consider, on a case-by-case basis, whether a placement would ensure the inmates health and safety and whether the placement would present management or security problems.

Cobb County Adult Detention Center Policy 2-02-09.00 Transgender / Intersex Inmates (p 2) states:

B. Employees shall respond appropriately to any knowledge obtained during the admission (booking) and classification process of an inmate identified or deemed to be transgender/intersex.

1. Intake personnel shall notify the Intake supervisor when it is known a transgender/intersex arrestee has arrived at the facility.

2. Transgender/intersex inmates shall be appropriately and primarily housed in areas based on their assigned sex at birth.

3. The Intake Nurse shall be notified when a transgender/intersex inmate comes into custody with prescribed medication as a result of hormonal therapy or other medical condition. Medication shall be provided to the nurse for review.

The facility shall consider on a case-by-case basis whether a placement would ensure the confined person's health and safety, and whether the placement would present management or security problems." Cobb County Adult Detention Center completes a Statewide Classification Committee Referral Form for all transgender and intersex confined persons to determine housing recommendations. Input is given by Cobb County Adult Detention Center's PREA Coordinator, medical director, mental health director, facilities director, and the assistant commissioner.

The interview with the PREA Compliance Coordinator confirmed the facility takes into consideration on a case-by-case basis whether a confined person's placement at the facility would ensure his or her health and safety and whether management or security concerns would arise as a result of the placement.

115.42 (d). Facilities are required by Cobb County Adult Detention Center policy, 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p 7) states: Placement and programming assignments shall be reassessed at least twice annually to ensure the inmate's safety and review any

threats experienced by the inmate.

The interviews with the PREA Compliance Coordinator and staff who conduct risk assessments confirmed transgender and intersex confined persons are reassessed every six months and as needed.

115.42 (e). Staff account for intake screening information pertaining to a confined person's own perception of vulnerability in making program decisions. Transgender and intersex confined persons are given a brochure that details their own views with respect to their own safety will be given serious consideration and staff will listen to them and take their concerns seriously.

The interviews with the PREA Compliance Coordinator and risk screening staff both confirmed transgender or intersex confined persons' views of his or her safety are given serious consideration in placement and programming assignments.

115.42 (f). Cobb County Adult Detention Center allows for transgender and intersex confined persons the opportunity to shower separately from other confined persons. Observation of the facility restroom areas confirmed individual showers have curtains allowing for complete privacy for all confined persons. The interviews with the PREA Compliance Coordinator and risk screening staff both confirmed transgender and intersex confined persons are afforded the opportunity to shower separately from other confined persons.

115.42 (g). The Cobb County Adult Detention Center is not under a consent decree, legal settlement, or legal judgment requiring it establish a dedicated wing to house lesbian, bi-sexual, gay, transgender or intersex (LBGTI) confined persons for their protection.

The interview with the PREA Coordinator confirmed Cobb County Adult Detention Center is prohibited from establishing dedicated facilities or housing units for LBGTI confined persons and the Cobb County Adult Detention Center PREA unit, through site visits, ensures its facilities are not housing LBGTI confined persons in dedicated housing units or beds. During interview with the PREA Compliance Coordinator she confirmed Cobb County Adult Detention Center is not under consent decree, legal settlement, or legal judgment requiring it establish a dedicated wing to house LBGTI confined persons for their protection.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.42 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.43 | Protective Custody |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p 8) <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (2)</p> <ol style="list-style-type: none"> 1. Jail Commander 2. PREA Compliance Coordinator <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <ol style="list-style-type: none"> a. Observation of Segregated Housing (n/a) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.43 (a) Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p 8) requires:</p> <ol style="list-style-type: none"> I. Inmates at risk for sexual victimization shall not be placed in dedicated housing or involuntary segregation as a means of separating them from potential abusers. <p>Confined persons at high risk for sexual victimization will not be placed in involuntary segregated housing unless an assessment of all available alternatives have been made and there is no alternative means of separation from likely abusers. If an assessment cannot be made immediately the confined person may be held in involuntary segregation for no more than 24 hours while completing the assessment. The placement and justifications for placement in involuntary segregation must be noted in OMS. While in any involuntary segregation, the confined person will have access to programs as described in Cobb County Adult Detention Center which also provides for reassessments. Confined persons will be kept in involuntary segregated housing for protection only until a suitable and safe alternative is identified.</p> <p>In response to the PAQ, the facility reported in the past 12 months there were zero (0) confined persons at risk of sexual victimization held in involuntary segregated housing for one to 24 hours awaiting completion of an assessment assigned to segregated housing.</p> |

115.43 (b) Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p 8) addresses provision (b) in its entirety. In instances where confined persons are placed in segregated housing to protect him or her from victimization the facility is required to allow access to programming, privileges, education and work opportunities. If access is limited, the facility will document the following:

Inmate shall be allowed access to normal inmate programs, education, normal privileges and work opportunities. If access is restricted, staff shall document which access was restricted, how long it was restricted and the reason it was restricted.

- The opportunities that have been limited.
- The duration of the limitation; and.
- The reasons for such limitations.

Informal interviews with staff confirmed confined persons are not restricted from out of cell activities. No confined persons were in segregated housing during the on-site visit to interview.

115.43 (c) Policy 1-07-08.00 Prison Rape Elimination Act, (p. 8), "The facility shall assign such confined persons 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," and requires the approval of the Watch Commander and shall be limited to a maximum of thirty (30) days.

In response to the PAQ, the facility reported in the past 12 months there were zero (0) confined persons at risk of sexual victimization who were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement.

115.43 (d) In response to the PAQ, the facility indicated there have been no involuntary segregation placements during the last 12 months. The PREA Compliance Coordinator also indicated there have been zero (0) placements during the audit cycle. If placements were to be made the reasoning would be thoroughly documented, including why no alternative means of separation can be arranged.

Staff shall document the reason alternative housing could not be arranged and the basis for the concern for the inmate's safety.

115.43 (e) Policy 1-07-08.00 Prison Rape Elimination Act, (p. 8), states, "Every 30 days, the facility shall afford each such confined person a review to determine whether there is a continuing need for separation from the general population." In response to the PAQ, the facility indicated there have been no involuntary segregation placements during the last 12 months.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.43 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.51 | Inmate reporting |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment 3. Training Records of Investigative Staff 4. Investigation Report of Alleged Sexual Abuse 5. Investigation Reports Referred to Sheriff's Office Inspectional Services 6. PREA Brochures English and Spanish 7. Dialing Instructions English and Spanish 8. Confined Persons Handbook, English and Spanish 9. MOU with LIVESAFE Resources 10. MOU with YWCA of Northwest Georgia 11. MOU with Cobb County District Attorney <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (1)</p> <ol style="list-style-type: none"> 1. PREA Compliance Coordinator 2. Random Staff (17) 3. Random Confined Persons (21) 4. Targeted Confined Persons (19) <p>In order to decide compliance determination, the following observations were made during my on-site tour of the facility:</p> <p>a. Observations of Reporting Mechanisms – (Posters, Confined person Handbooks, Brochures)</p> <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.51 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment (pp 11-12), allows for confined persons to make a report of sexual abuse and sexual harassment, and retaliation through the following means: in writing, verbally, or through available internal or external methods. External methods include Third Party reporting to the Cobb County District Attorney's Office, LIVESAFE Resources, and YWCA of Northwest Georgia. Policy addresses the use of the PREA Hotline as a mechanism for reporting sexual abuse or harassment. The auditor tested the PREA Hotline from various phones and found it easy to connect.</p> |

The interviews with random staff confirmed 100 percent knew of the multiple ways for confined persons to privately report sexual abuse, sexual harassment, and retaliation. Staff are aware of their responsibilities to report; a) any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment that occurs in any detention, correctional or prison facility, court holding areas, or other holding area.

Staff are required by policy to report any knowledge, suspicion or information related to retaliation against an inmate(s) or staff member who reported an incident of sexual abuse/harassment or who cooperated with an investigation of sexual abuse/harassment. Staff negligence or dereliction of duties that may have contributed to an incident or retaliation; or outside criminal or administrative investigations involving their conduct related to sexual abuse or sexual harassment.

The auditor observed PREA reporting materials prominently posted throughout the facility.

115.51 (b). In response to the PAQ, the facility provided documentation, Policy 1-07-08.00 Prison Rape Elimination Act, B. (p 12) Inmate Reporting discusses multiple avenues for confined person reporting. Included is the 24/7 availability of the toll-free and anonymous if desired, PREA Hotline to report allegations of sexual abuse and sexual harassment to an entity outside of the Cobb County District Attorney's Office, YWCA of Northwest Georgia, or LIVESAFE Resources. Cobb County Adult Detention Center does not detain confined persons solely for civil immigration purposes.

The interview with the PREA Compliance Coordinator confirmed confined persons have multiple ways of reporting sexual abuse or sexual harassment to a public or private entity as noted in the confined person handbook. Confined persons have toll free and anonymous telephonic access to YWCA of Northwest Georgia or LIVESAFE Resources, and Cobb County District Attorney.

The interviews with a random sampling of confined persons confirmed all knew of the different reporting avenues and they could report without giving their name. The auditor observed phones with Zero-Tolerance posters containing contact information for reporting.

115.51 (c). Per Policy 1-07-08.00 Prison Rape Elimination Act, (p. 12) staff members are to verbal and written reports and those from a third parties and promptly document any verbal reports. Staff are to forward all reports or suspicions of sexual abuse or sexual harassment to their immediate supervisor, or the designated staff member promptly.

The interviews with random staff confirmed they accept third party, written and verbal reports of allegations of sexual abuse and sexual harassment and act upon the reports immediately. Staff also indicated verbal reports are documented in writing immediately. The interviews with random confined persons confirmed were aware they could make a report of sexual abuse or sexual harassment via a third party, verbally or in writing. In response to the PAQ, the facility reported staff document verbal reports "immediately."

115.51 (d). The interviews with random staff confirmed multiple methods for privately reporting sexual abuse and sexual harassment of confined persons. Staff indicated they could report to their supervisors or any upper level staff in a private office or area free of other staff or confined persons and written or verbal reports. Staff indicated they can report verbally, via email, or telephone.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.51 based upon documentation provided and interviews conducted.

Corrective Action: (None)

| 115.52 | Exhaustion of administrative remedies |
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| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment - Inmate Reporting (pp 12-13) 3. Statewide Grievance Procedure, PN 227.02, (eff. 5/10/19) 4. Cobb County Adult Detention Center Confined person Handbook <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (1)</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Targeted Confined persons who Reported a Sexual Abuse (3) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.52 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment - Inmate Reporting (pp 12-13) states, inmates may privately report incidents of sexual abuse, sexual harassment or retaliation for reporting such incidents, staff neglect or violations of responsibilities that may have contributed to such incidents by: utilizing the inmate grievance process. Inmates may submit the grievance to any authorized staff member.</p> <p>Information received by the PREA Coordinator verified this policy and procedures by indicating if facilities receive an allegation of sexual abuse or harassment on a grievance form it is to be treated as a written allegation only and forwarded to SART for investigation.</p> <p>115.52 (b). (1) The agency shall not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. (2) The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse. (3) The agency shall not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse. (4) Nothing in this section shall restrict the agency's ability to defend against an inmate lawsuit on the ground that the applicable statute of limitations has expired.</p> <p>Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment - Inmate Reporting (pp 12-13), filing a complaint/report with a public or private entity who is able to receive and</p> |

immediately forward the complaint/report to the Sheriff's Office; or filing a complaint, by phone or written communication, through a third party who is able to receive and immediately forward the report to the Sheriff's Office.

Third party may be any private entity who is not a part of the Sheriff's Office (i.e. family member, chaplain, attorney, friend, etc.).

115.52 (c). The agency shall ensure that— (1) An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and (2) Such grievance is not referred to a staff member who is the subject of the complaint.

Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment - Inmate Reporting (pp 12-13), inmates shall not be required to submit a grievance for sexual abuse, sexual harassment or retaliation to the staff member who is the subject of the complaint.

115.52 (d). (1) The agency issues 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. (2) Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal. (3) The agency may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the inmate in writing of any such extension and provide a date by which a decision will be made. (4) 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, the inmate may consider the absence of a response to be a denial at that level.

Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment - Inmate Reporting (pp 12-13), when a grievance for sexual abuse has been filed, a decision on the grievance or any part of the grievance alleging sexual abuse shall be issued within ninety (90) days of the initial filing of the grievance.

In response to the Pre-Audit Questionnaire:

In the past 12 months, the number of grievances filed that alleged sexual abuse: 33

In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed: 33

In the past 12 months, the number of grievances alleging sexual abuse that involved extensions because final decision was not reached within 90 days: 0

115.52 (e). (1) Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of inmates. (2) 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 agrees 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. (3) If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision.

Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment - Inmate Reporting (pp 12-13), third parties, including fellow inmates, authorized staff; family members, attorneys, chaplains and outside advocates may assist inmates in filing reports for administrative remedies relating to allegations of sexual abuse and file the request on behalf of the inmate.

a). The alleged victim may be required to agree to the request filed on his/her behalf as a condition of processing the complaint.

b). If the alleged victim declines to have the request processed, the decision to decline shall be documented and maintained in the inmate's file and the investigative file.

c). The alleged victim may be required to pursue any subsequent steps in the administrative remedy process.

115.52 (f). (1) The agency shall establish procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. (2) After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the agency shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision documents the agency's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment - Inmate Reporting (pp 12-13), any inmate who believes he/she is subject to a substantial risk of imminent sexual abuse may file an emergency grievance.

a). Emergency grievances shall be immediately forwarded to the Watch Commander or his designee.

b). Initial response to the inmate is required within forty-eight (48) hours, with a final decision required within five (5) calendar days.

c). Watch Commander shall document the resulting determination and actions taken by staff in response to the emergency grievance.

In response to the Pre-Audit Questionnaire:

The number of those grievances in 115.52(e)-3 that had an initial response within 48

hours: 0

The number of grievances alleging substantial risk of imminent sexual abuse filed in the past 12 months that reached final decisions within 5 days: 0

115.52 (g). The agency may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.

An inmate may be disciplined for filing a grievance where it is demonstrated that the inmate filed the grievance in bad faith. Its limited if determined the grievance was filed in good faith even if found to be unsubstantiated. Confined persons may discipline if the grievance is determined to be filed in bad faith.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.52 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.53 | Inmate access to outside confidential support services |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (pp 22-23) 3. Confined person Handbook, English and Spanish 4. MOU YWCA of Northwest Georgia 5. MOU LIVESAFE Resources 6. MOU Cobb County District Attorney 7. PREA Brochures, English and Spanish <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <ol style="list-style-type: none"> 1. Random Confined Persons (21) 2. Confined persons who Reported a Sexual Abuse (3) <p>In order to decide compliance determination, the following observations were made during the on-site tour of the facility:</p> <p>Posted Documents: Brochures, Posters, YWCA of Northwest Georgia or LIVESAFE Resources Flyer</p> <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.53 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (pp 22-23), discusses the requirements for allowing confined person access to emotional support services, including those within the community. The facility utilizes various means to communicate the availability of emotional support services with the confined persons. The facility provides confined persons with access to outside victim advocates for emotional support services related to sexual abuse by providing all confined persons with an informational guide (as part of the confined person handbook) and brochures describing available emotional support organizations for victims of sexual abuse. The confined person handbook contains information titled, "Break the Silence of Abuse". Additionally, a dual-language confined person education and awareness brochure is given to confined persons upon arrival to the facility.</p> <p>All victims of sexual abuse shall be provided access to an outside victim advocate from a rape crisis center or other qualified individual from a community based organization.</p> |

During the facility tour, the auditor observed prominently displayed posters containing the number and dialing instructions to call the PREA Unit Hotline if need be. Informal interviews with confined persons confirmed were aware of the posters and they knew how to contact the PREA Unit.

There was three (3) confined person who reported a sexual abuse to interview.

Communication between confined persons and outside emotional support agencies can be made privately and confidentially. Telephones are monitored but confined persons do not have to give their name or provide any PIN number. Telephones were in use during the site review indicating they were operational.

115.53 (b). The facility enables reasonable communication between confined persons and emotional support organizations and agencies in as confidential manner as possible by providing access to outside victim advocates via toll-free telephone numbers and addresses. The Outside Resources – PREA Information and Resources section (p. 23) of the confined person handbook indicates communication between an advocate and victim is confidential. Confined persons are given a copy of the handbook, during intake processing, which contains information on PREA and how to access outside emotional support services by providing a hotline number. The auditor will recommend inclusion of the facility’s responsibility regarding mandatory reporting laws.

Victim shall be informed of the extent to which communications with the advocate are monitored by the Sheriff’s Office.

The interviews with a random confined persons confirmed basic understanding that calls to agencies offering emotional support are private and could be reported if someone were to get hurt or was hurt.

115.53 (c). Policy 1-07-08.00 Prison Rape Elimination Act (p. 15) requires the facility’s PREA Compliance Coordinator to attempt to enter into an agreement or Memorandum of Understanding (MOU) with an outside advocate service to provide victim advocacy services to confined persons alleging sexual abuse or sexual harassment. In response to the PAQ, the facility provided MOUs with YWCA of Northwest Georgia, LIVESAFE Resources and Cobb County District Attorney’s Office. Cobb County Adult Detention Center has outside advocate services to respond to requests from Cobb County Adult Detention Center to provide accompaniment for incarcerated victims of sexual assault during the forensic medical examination process and investigatory interviews; maintain confidentiality as required by state and federal laws pursuant to Georgia Code Title 24 Evidence 24-5-509 and the requirements.

A qualified member of YWCA of Northwest Georgia or LIVESAFE Resources will provide emotional support services in response to referrals and requests from incarcerated victims. Mental Health Services are provided on-site for any emergency mental health needs for a confined person victim of sexual assault, with proper consent and without disclosing anything beyond immediate concern; provide training on trauma informed responses to sexual abuse and sexual harassment for Cobb County Adult Detention Center Staff, as needed and communicate any questions or concerns to the PREA

Compliance Coordinator.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.53 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.54 | <p>Third-party reporting</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - Third Party Reporting (pp 13-14) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.54 (a). Policy 1-07-08.00 Prison Rape Elimination Act - Third Party Reporting (pp 13-14) third party reporting may be made to the Cobb County District Attorney's Office, LIVESAFE, or YWCA of Northwest Georgia by phone, mail, or email. Information on how to report sexual abuse and sexual harassment on behalf of a confined person can be found in the visitation center, posters on the wall advising of PREA and how it can be reported and who to report to. Also brochures are available at the Information Desk for distribution to visitors.</p> <ol style="list-style-type: none"> 1. Methods for third party reporting of sexual abuse/sexual harassment shall be posted in public areas of the Sheriff's Office and on the Sheriff's Office public web site. 2. Third parties may file a verbal or written complaint with any Sheriff's Office employee. 3. Employee shall immediately direct the complaint/complainant to a sworn supervisor. 4. Employee shall personally escort the complaint/complainant to the supervisor. <p>The auditor has determined current operations and practices meet the requirements of PREA Standard 115.54 based upon documentation provided and interviews conducted.</p> <p>Corrective Action: None</p> |
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| 115.61 | Staff and agency reporting duties |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment (pp 10-13) 3. Investigative Report of Sexual Abuse Allegation Form 4. Staff PREA Education <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (3)</p> <ol style="list-style-type: none"> 1. Jail Commander 2. PREA Coordinator 3. Medical Staff 4. Random Staff (17) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.61 (a) (c). In response to the PAQ, staff reported the agency requires all staff to immediately report any knowledge, suspicion, or information they received regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not is part of the agency; retaliation against confined persons or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment (pp 10-13) states:</p> <p>All authorized staff have an affirmative duty to immediately report:</p> <ol style="list-style-type: none"> a) Any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment that occurs in any detention, correctional or prison facility, court holding areas, or other holding area. b) Any knowledge, suspicion or information related to retaliation against an inmate(s) or staff member who reported an incident of sexual abuse/harassment or who cooperated with an investigation of sexual abuse/harassment. c) Any staff negligence or dereliction of duties that may have contributed to an incident or retaliation; or. |

d) Any outside criminal or administrative investigations involving their conduct related to sexual abuse or sexual harassment.

One hundred percent of the random staff interviewed confirmed all staff knows of their requirements for reporting instances or allegations of sexual abuse, retaliation, or staff neglect. All staff was adamant they would not hesitate to report to their supervisor.

The auditor's review of investigation files confirmed incidents were reported timely and investigated promptly.

All Cobb County Adult Detention Center employees, contractors and volunteers are to sign a PREA Education Acknowledgement Statement indicating they have a duty to report to a nearby supervisor if they witness a PREA incident or someone reports to them any PREA related incident or information. This includes medical and health practitioners.

The interviews with medical and mental health staff confirmed they were aware of their duty to report, confidentiality limitations at the beginning of services.

115.61 (b). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment (pp 10-13) states, authorized staff is prohibited from revealing any information related to a sexual abuse or sexual harassment report to anyone other than those individuals necessary to arrange medical/mental health treatment, investigation and security/housing decisions. Failure to report an occurrence of sexual abuse, sexual harassment or retaliation for reporting same may result in administrative and/or disciplinary action up to and including termination.

Staff members who fail to comply with the reporting provisions of this policy may be banned from correctional facilities, or will be subject to disciplinary action, up to and including termination, whichever is applicable. The interviews with random staff confirmed they would disclose any information they knew of or heard of to their immediate supervisors and would not discuss with other staff members.

115.61 (c). All Cobb County Adult Detention Center employees, contractors and volunteers are to sign a PREA Education Acknowledgement Statement indicating they have a duty to report to a nearby supervisor if they witness a PREA incident or someone reports to them any PREA related incident or information. This includes medical and health practitioners.

The interviews with medical and mental health staff confirmed they were aware of their duty to report, confidentiality limitations at the beginning of services.

115.61 (d). In response to the PAQ, the facility reported its use if for adult confined persons between the ages of 17 -79 years old, as such the Cobb County Adult Detention Center houses youthful offenders; the agency policy requires if the victim was under the age of 18, designee is required to report the allegation to the Department of Family and Children Services.

Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.07 Reporting Allegations of Sexual Abuse and Sexual Harassment (p 13) states, if the alleged victim of sexual abuse is a youthful inmate or considered a vulnerable adult under a state or local vulnerable person statute, the allegation shall be reported to the designated state or local services agency under applicable mandatory reporting laws.

Interviews with the PREA Coordinator and Jail Commander indicated all Cobb County Adult Detention Center staff are mandated reporters. If a youthful offender reports an allegation of sexual abuse or sexual harassment, staff are mandated to report his/her allegation to the Georgia Department of Family and Children Services, and so they can have the opportunity to conduct an independent investigation. Cobb County Adult Detention Center investigators will continue the administrative and, if applicable, a criminal investigation regarding the allegation.

115.61 (e). During interview with the Jail Commander confirmed all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports are reported and investigated.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.61 based upon documentation provided and interviews conducted.

Corrective Action: None

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| 115.62 | Agency protection duties |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act 1-07-08.06 Supervision & Monitoring (P 9) 3. Cobb County Adult Detention Center Coordinated Response Plan, attachment 7 <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (1)</p> <ol style="list-style-type: none"> 1. Jail Commander 2. Random Staff (17) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.62 (a). Policy 1-07-08.00 Prison Rape Elimination Act 1-07-08.06 Supervision & Monitoring (P 9) states, any inmate who is at a substantial risk of imminent sexual abuse shall be immediately separated from potential abusers to ensure the inmate's safety. Inmates shall not be denied access to programs and other out-of-cell opportunities as a result of complying with this policy.</p> <p>In response to the PAQ, the facility reported the number of times the agency or facility determined that a confined person was subject to a substantial risk of imminent sexual abuse.</p> <p>In the past 12 months, the number of times the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse: 126</p> <p>The interviews with a random sampling of staff confirmed all staff response immediately to the situation taking protective measures to separate the confined persons and move the victim to a safe place in view of staff.</p> <p>The interview with the Jail Commander indicated Cobb County Adult Detention Center has a zero-tolerance for retaliation on any person reporting or cooperating with a sexual abuse or sexual harassment investigation. All allegations, except for those deemed unfounded, are monitored for retaliation. Individuals that retaliate against staff or confined persons for cooperation with an investigation will be disciplined per CCADC discipline policies.</p> <p>Upon learning of substantial risk of imminent sexual abuse, protective actions taken to protect the confined person include immediately shielding the confined person(s)</p> |

from any further or pending abuse by separating the confined person from the aggressor and relocating to a safe place in the facility, near staff or in another building; identify locations within the area for temporary placement of the victim; transfer the aggressor to a secure facility pending investigation.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.62 based upon documentation provided and interviews conducted.

Corrective Action: None

115.63 Reporting to other confinement facilities

Auditor Overall Determination: Meets Standard

Auditor Discussion

In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:

- 1. Cobb County Adult Detention Center Pre-Audit Questionnaire
- 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 Notifications to Other Confinement Facilities & Inmates (p 15)

In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:

Specialized Staff (1)

- 1. Jail Commander

The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):

115.263 (a). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 states, upon receiving an allegation that an inmate was sexually abuse while confined at another facility, the Division Commander or his designee shall notify the head of the agency or facility where the abuse is alleged to have occurred. Notification shall be made within seventy-two (72) hours of receiving the complaint and shall be documented and maintained by the PREA Coordinator.

In response to the Pre-Audit Questionnaire:

In the past 12 months, the number of allegations the facility received that an inmate was abused while confined at another facility: 1

115.263 (b). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 states, requires the notification be provided as soon as possible but not later than 72 hours after receiving the allegation. The facility head or Commander receiving the notification is required to ensure that the allegation is investigated in accordance with the PREA Standards.

115.263 (c). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 states, require notifications to be documented. The notification is annotated in the report who called and when.

115.263 (d). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 19) states, A. All allegations of sexual abuse and sexual harassment shall be promptly, thoroughly and objectively investigated.

In response to the PAQ, the facility documented number of allegations during the past

12 months in which a confined person at this facility alleged sexual abuse at another facility: 0

The interviews with the Jail Commander and PREA Coordinator indicated when the facility receives notification from another agency that an allegation of sexual abuse or sexual harassment occurred at another Cobb County Adult Detention Center, policy requires the receiving facility take steps to investigate the allegation. Each facility has a PREA Compliance Coordinator that serves as the point-of-contact for such allegations. Cobb County Adult Detention Center Policy's Statewide PREA Coordinator also serves as a point of contact. External reports of sexual abuse or sexual harassment is reported to the facility PREA Compliance Coordinator or the Statewide PREA Coordinator.

Based on the interviews, the auditor is confident the facility leadership would take appropriate action if a notification is received. In response to the PAQ, the facility reported zero allegations of sexual abuse the facility received from other facilities.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.63 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.64 | Staff first responder duties |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act -1-07-08.09 Agency Response to Allegations of Sexual Abuse and Sexual Harassment <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <ol style="list-style-type: none"> 1. Random Staff (17) 2. Targeted Confined persons who Reported a Sexual Abuse (3) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.64 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.09 Agency Response to Allegations of Sexual Abuse and Sexual Harassment (p. 16) states the initial responding Deputy to an allegation or incident of sexual abuse shall be responsible for the following:</p> <ol style="list-style-type: none"> 1. Separating the alleged victim from the alleged abuser. 2. Notify Medical Staff. 3) If victim is treated medically, a Deputy shall stay with the victim until relieved. 4. Notify a supervisor. 5. Preserving and protecting any crime scene until evidence can be collected. 5. Requesting that the victim not take any actions that could destroy or compromise physical evidence, including, washing, and brushing teeth, changing clothes, urinating, defecating, drinking or eating. 7. Preventing the alleged abuser from taking any actions that may destroy or compromise physical evidence, including, washing, and brushing teeth, changing clothes, urinating, defecating, drinking or eating. 8. Recording initial statements and names of all individuals present or involved. <p>In response to the PAQ, the facility reported the number of allegation of sexual abuse in the past 12 months.</p> <p>In the past 12 months, the number of allegations that an inmate was sexually abused: 22</p> <p>Of these allegations of sexual abuse in the past 12 months, the number of times the first security staff member to respond to the report separated the alleged victim and abuser: 22</p> |

In the past 12 months, the number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence: 3

Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate steps could be taken to collect any evidence: 3

Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report requested 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: 3

Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report ensured that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating: 3

A review of the documentation indicated protocols pursuant to this provision were followed as necessary relating to the nature of the abuse allegation.

The auditor interviewed three (3) confined person that reported sexual abuse during the 12 months preceding the audit.

The interview with security staff first responders and informal staff interviews confirmed a great deal of knowledge of first responder duties and exactly what to do in response situations. There were no confined persons who reported a sexual abuse to interview during this audit.

115.64 (b). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.09 Agency Response to Allegations of Sexual Abuse and Sexual Harassment (p. 16) states, if the authorized staff member is not a certified Deputy, the staff member shall immediately notify a certified Deputy.

1. Authorized staff shall inform the alleged victim not to take any action that could destroy or compromise physical evidence.

In response to the Pre-Audit Questionnaire:

Of the allegations that an inmate was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder: 1

Of those allegations responded to first by a non-security staff member, the number of times that staff member requested that the alleged victim not take any actions that could destroy physical evidence: 1

Of those allegations responded to first by a non-security staff member, the number of

times that staff member notified security staff: 1

The interviews with security staff first responder and non-security staff first responder and Random Staff (17) confirmed detailed knowledge of first responder protocols.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.64 based upon documentation provided and interviews conducted.

Corrective Action: None

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| 115.65 | Coordinated response |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 19) <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (1)</p> <p>Jail Commander</p> <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.265 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 19) and Policy 1-07-08.12 Medical and Mental Health Care (p 22) states, all allegations of sexual abuse and sexual harassment shall be promptly, thoroughly and objectively investigated.</p> <p>Medical and mental health care shall be provided to all inmates who have been victimized by sexual abuse in any prison, lockup or jail facility.</p> <p>If there was a sexual assault allegation, the facility, complying with Cobb County Adult Detention Center Policy will initiate the sexual abuse response.</p> <p>The auditor has determined current operations and practices meet the requirements of PREA Standard 115.65 based upon documentation provided and interviews conducted.</p> <p>Corrective Action: (None)</p> |

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| 115.66 | Preservation of ability to protect inmates from contact with abusers |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <p>1. Cobb County Adult Detention Center Pre-Audit Questionnaire</p> <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (1)</p> <p>Jail Commander</p> <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.66 (a). In response to the PAQ, the facility reported the agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has not entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit.</p> <p>The Interview with the Jail Commander verified Cobb County Adult Detention Center has not engaged with collective bargaining with employees.</p> <p>The auditor has determined current operations and practices meet the requirements of PREA Standard 115.66 based upon documentation provided and interviews conducted.</p> <p>Corrective Action: None</p> |

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| 115.67 | Agency protection against retaliation |
| | <p data-bbox="256 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 557 297">Auditor Discussion</p> <p data-bbox="256 340 1445 416">In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol data-bbox="256 454 1409 611" style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Prison Rape Elimination Act - 1-07-08.10 Protection from Retaliation (pp 17-18) 3. Investigations Packets 4. Retaliation Monitoring List <p data-bbox="256 651 1453 728">In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p data-bbox="256 766 544 799">Specialized Staff (3)</p> <ol data-bbox="256 837 1139 954" style="list-style-type: none"> 1. Jail Commander 2. Staff Member Charged with Retaliation Monitoring 3. Targeted Confined Person Who Reported a Sexual Abuse (3) <p data-bbox="256 992 1417 1068">The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p data-bbox="256 1106 1437 1182">115.67 (a). Prison Rape Elimination Act - 1-07-08.10 Protection from Retaliation (pp 17-18) states,</p> <p data-bbox="256 1189 1469 1305">A. Retaliation of any kind towards any authorized staff member, inmate or third party who reports sexual abuse or who cooperates in an investigation of any sexual abuse or sexual harassment allegation is prohibited.</p> <p data-bbox="256 1344 1481 1460">B. The PREA Coordinator and Watch Commanders shall monitor the conduct/ treatment of inmates and staff who reported sexual abuse or inmates who reported to have suffered sexual abuse for signs of potential retaliation.</p> <p data-bbox="256 1498 1477 1783">Cobb County Adult Detention Center's commitment to protect all confined persons and staff who report sexual abuse or sexual harassment and cooperate with sexual abuse or sexual harassment investigations are protected from all forms of retaliation by other confined persons or staff. Policy requires the institution's Jail Commanders to designate a staff member to serve as the facility Retaliation Monitor. The Major (PREA Compliance Coordinator) has been designed the Retaliation Monitor for Cobb County Adult Detention Center.</p> <p data-bbox="256 1821 1465 2024">115.67 (b). The policy addresses confined person protection measures. Cobb County Adult Detention Center has multiple protection measures to include housing changes or transfers, removal of alleged staff members or confined person abusers from contact with victims, and emotional support services for confined persons and/or staff members who fear retaliation for reporting or for cooperating with investigations.</p> |

The interview with the Jail Commander designee reiterated the agency has a zero-tolerance for retaliation on any person reporting or cooperating with a sexual abuse or sexual harassment investigation and that all allegations, except for those deemed unfounded, are monitored for retaliation. Cobb County Adult Detention Center's zero-tolerance for retaliation is a deterrent for any individual that retaliates on staff or confined person for cooperation will be disciplined.

The Retaliation monitor described her role in preventing retaliation and monitoring retaliation and said she looks at housing assignments, detail reassignments and any changes in programming activities.

Retaliation monitoring is documented on the Cobb County Adult Detention Center Retaliation Monitoring Form. For staff she would review post assignments, changes in shifts, performance reports and any disciplinary reports.

115.67 (c). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.10 Protection from Retaliation addresses confined person retaliation monitoring. Monitoring is required to be conducted for at least 90 days following a report of abuse. Monitoring includes the conduct and treatment of confined persons and staff to see any changes to indicate possible retaliation and to remedy any retaliation.

Monitoring may continue beyond 90 days if the initial monitoring indicates the need for it. Periodic status checks of confined persons will be conducted. The obligation for monitoring terminates if the allegation is unfounded. Policy requires that monitoring is documented on the Cobb County Adult Detention Center Form 90 Day Confined person Sexual Abuse Review Checklist. The checklist is completed for each confined person being monitored. The Cobb County Adult Detention Center 90 Day Confined person Sexual Abuse Review Checklist includes documenting the reviews of the following at 30, 60 and 90 days:

- Confined person Disciplinary Report(s) History.
- Confined person Housing Unit Placement Reviewed.
- Confined person Transfer(s) Placement Review.
- Confined person Program(s) History Review.
- Confined person Work Performance Review.
- Confined person Schedule History Review.
- Confined person Case Note(s) Review.

Interviews conducted with the retaliation monitor confirmed monitoring takes place for an initial 90 days but is extended depending on if the situation warrants additional monitoring. The Jail Commander indicated they try to identify the alleged retaliation and hold them accountable, be it a confined person or staff.

In response to the PAQ, the facility reported the number of instances of retaliation monitoring in the last 12 months: 0

115.67 (d). Periodic status checks of confined persons will be conducted. The obligation for monitoring terminates if the allegation is unfounded. Policy requires that monitoring is documented on the Cobb County Adult Detention Center Form 90

Day Confined person Sexual Abuse Review Checklist. The checklist is completed for each confined person being monitored. The interview with the retaliation monitor confirmed she conducts random checks with confined persons during the 90 days of monitoring and any subsequent monitoring.

115.67 (e). The interview with the Jail Commander confirmed if any individual confined person or staff, fears retaliation for cooperating with investigations, protective measures will be instituted. All allegations are monitored for retaliation and Cobb County Adult Detention Center's zero- tolerance for retaliation is a deterrent for anyone to retaliate. If retaliation occurs, the person retaliating will be disciplined.

The auditor finds the facility in compliance with PREA Provision 115.67 (e) based upon interviews conducted and documentation provided.

Corrective Action: (None)

115.68 Post-allegation protective custody

Auditor Overall Determination: Meets Standard

Auditor Discussion

In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:

- 1. Cobb County Adult Detention Center Pre-Audit Questionnaire
- 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p 8)

In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:

Specialized Staff (1)

- 1. Jail Commander

The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):

115.68 (a) Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.05 Housing and Program Assignments (p 8) (p 17) address involuntary segregation. Inmates at risk for sexual victimization shall not be placed in dedicated housing or involuntary segregation as a means of separating them from potential abusers.

Use of segregated housing states:

- 1. Inmates may be placed in segregated housing for a period of up to twenty-four (24) hours as a means of immediately separating the inmate from an abuser.
- 2. An assessment for other housing alternatives shall be conducted within the twenty-four (24) hour time frame.
- 3. If no other suitable housing is found, the inmate's assignment to segregated housing may be extended.
- 4. An assessment for other housing alternatives shall be conducted at a minimum of every twenty-four (24) hours.
- 5. Inmates placed in segregated housing shall have access to all inmate programs, privileges, educational and work opportunities as practicable.
- 6. If any restrictions are applied to any program, the reason the program/opportunity was restricted, the duration of the restriction and the identity of the restricted program shall be documented.

The placement and concern for the confined person's safety must be documented in the confined person database, OMS documenting concern for the confined person's safety and the reason why no alternative means of separation can be arranged. Confined persons who are placed in involuntary segregation are housed there only until an alternative means of separation from likely abusers can be arranged and the assignment, ordinarily, shall not exceed 30 days. Reviews are required to be conducted every 30 days to determine whether there is a continuing need for

separation from the general population.

Individual records are required and will document, all activity such as bathing, exercise, medical visits, program participation and religious visits are documented. If access to programming, privileges, and education, or work opportunities is restricted, the facility is to document the restriction and the reasons for such restrictions.

In response to the PAQ, the facility documented the number of confined persons who alleged to have suffered sexual abuse that were held in involuntary segregated housing.

The number of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment: 0

The number of inmates who allege to have suffered sexual abuse who were assigned to involuntary segregated housing in the past 12 months for longer than 30 days while awaiting alternative placement: 0

From a review of case files of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH (a) a statement of the basis for facility's concern for the inmate's safety, and (b) the reason or reasons why alternative means of separation could not be arranged.

The interview with Cobb County Adult Detention Center Jail Commander confirmed, if a confined persons in this situation are identified they would be placed in segregation temporarily and transferred to another facility if the situation warranted.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.68 based upon documentation provided and interviews conducted.

Corrective Action: (None)

| 115.71 | Criminal and administrative agency investigations |
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| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (pp 19 - 21) 3. Investigative Staff Training Records (27) 4. Administrative Investigation Report (10) <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (3)</p> <ol style="list-style-type: none"> 1. Jail Commander 2. Facility Criminal Investigative Staff 3. PREA Compliance Coordinator 4. Targeted Confined persons Who Reported a Sexual Abuse (3) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.71 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08. Investigations (pp 19 - 21) states, all allegations of sexual abuse and sexual harassment shall be promptly, thoroughly and objectively investigated. Investigations of sexual abuse shall be conducted by members of the Sheriff's Office Criminal Investigative Section or an outside agency with the legal authority to conduct criminal investigations. Allegations of sexual harassment shall be investigated by a member of the Sheriff's Office Inspectional Services Section or other staff member as designated by the Sheriff.</p> <p>The auditor reviewed investigative reports stemming from a confined person self-report of alleged sexual abuse.</p> <p>115.71 (b). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (pp 19 - 21) states, investigators conducting investigation of inmate sexual abuse or sexual harassment shall receive specialized training in accordance with PREA Standards. Specialized training shall include:</p> <p>Techniques for interviewing victims of sexual abuse. Proper use of Miranda and Garrity warnings. Sexual abuse evidence collection in confinement settings. The criteria and evidence required to substantiate a case for administrative action or criminal prosecution.</p> |

Training shall be documented and maintained in the Investigator's training file. All investigators have completed the National Institute of Corrections Specialized Training, "PREA: Investigating Sexual Abuse in a Confinement Setting". During the interview with the facility investigator indicated he has completed the required training "Investigating Sexual Abuse in Confinement Setting". The auditor was provided a copy of his training certificate as confirmation. Training documentation is also discussed in Standard 115.34 (c).

115.71 (c). Cobb County Adult Detention Center's PREA policy requires investigative agents and investigators to gather and preserve direct and circumstantial evidence including any available electronic monitoring data; to interview alleged victims, suspected perpetrators, and witnesses; and to review prior complaints and reports of sexual abuse involving the suspected perpetrator.

The interview with investigative staff confirmed initial steps in an investigation includes obtaining witness statements through interviews and compiling all statements, evidence reviewed (any camera video recording feeds, threats or complaints involving the parties etc.) and generating a report based on all the information.

115.71 (d). Investigations of sexual abuse shall be conducted by members of the Sheriff's Office Criminal Investigative Section or an outside agency with the legal authority to conduct criminal investigations.

115.71 (e). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (pp 19 - 21). Inmates who allege sexual abuse shall not be required to submit to a polygraph examination or other truth-telling device as a condition of investigating said allegation. The credibility of the victim, suspect, or witness shall be assessed on an individual basis and will not be determined by the person's status as confined person or staff member.

When interviewed about the credibility of an alleged victim, suspect, or witness, the facility investigator indicated it did not matter if it was a staff member or confined person, and just because the individual is an confined person does not mean he or she is being untruthful and that under no circumstances would a polygraph be utilized prior to proceeding with any investigation.

There were three (3) confined persons who reported a sexual abuse occurring at this facility during this audit cycle that were interviewed.

The auditor finds the facility in compliance with PREA Provision 115.71 (e) based on interviews conducted and documentation provided.

115.71 (f). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 21). Investigators with Inspectional Services, conducting an administrative investigation, shall be responsible for the following:

1. Responding to the incident.

2. Obtaining all relevant information, including complaints, reports, logs, electronic

monitoring data, inmate records, etc.

3. Reviewing documentation and conducting interviews regarding compliance with relevant policies and procedures.

4. Attempting to determine if the actions of staff members, or failure to act, contributed to the abuse/harassment issue; and

5. Prepare a thorough investigative report to include a description of physical and testimonial evidence, the reasoning behind credibility assessments and investigative facts and findings.

The interview with the facility investigator of administrative allegations confirmed staff actions or failures to act are taken into consideration as to whether it contributed to the abuse.

115.71 (g). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 20), Investigators prepare a thorough investigative report to include a description of physical, testimonial and documentary evidence.

Based on review of the initial investigative documents, policy and interviews, the auditor believes the facility and agency conduct criminal investigations as required by standard 115.71.

115.71 (h). Refer all substantiated allegations of conduct that supports criminal prosecution to the appropriate judge/prosecutor.

115.71 (i). If an allegation of sexual abuse, occurring while an inmate is in the custody of this agency, is investigated by an outside agency, said agency shall conduct the investigation in accordance with PREA Standards.

1. The Sheriff shall have the sole discretion to request the assistance of an outside agency.

2. The Sheriff, or his designee, shall be routinely informed of the progress of the investigation and ensure that all notification requirements are adhered to.

3. The Sheriff's Office shall cooperate fully with outside investigators.

The agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years, per PREA policy. Cobb County Adult Detention Center PREA Implementation Manual (p. 32) in part states, Cobb County Adult Detention Center retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

115.71 (j). Investigation shall not be terminated based solely on the release of the alleged abuser or the victim or the termination of employment or contractual agreement of an alleged abuser.

Cobb County Adult Detention Center's PREA policy dictates an administrative or criminal investigation is to be completed for all allegations of sexual abuse and sexual harassment. Policy further stipulates in part. The departure of the alleged abuser or victim from the employment or control of the Department shall not provide a basis for terminating the investigation.

The interview with the facility investigator confirmed investigations are completed and are updated as to the findings.

115.71 (k). For purposes of this audit, this auditor is not required to make a compliance determination for provision (k) of this standard.

115.71 (l). Cobb County Adult Detention Center conducts investigations of all allegations of sexual abuse that have occurred in their facilities. As such, this provision is not applicable in determining compliance for PREA Standard 115.71.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.71 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.72 | <p>Evidentiary standard for administrative investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 19) 3. Administrative Investigative Report <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (2)</p> <ol style="list-style-type: none"> 1. Facility Investigator 2. Criminal Investigator <p>The following describes how the evidence above was used to draw the conclusion regarding compliance:</p> <p>115.72 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.11 Investigations (p 19) states, the Sheriff’s Office shall impose no standards higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>The interview with the facility investigator confirmed investigators utilizes the “preponderance of the evidence” as the standard in determining whether allegations of sexual abuse and/or sexual harassment are substantiated, unsubstantiated, or unfounded. The auditor reviewed one administrative investigative report and a preponderance of evidence was utilized in determining the unsubstantiated disposition.</p> <p>The auditor has determined current operations and practices meet the requirements of PREA Standard 115.72 based upon documentation provided and interviews conducted.</p> <p>Corrective Action: (None)</p> |
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115.73 Reporting to inmates

Auditor Overall Determination: Meets Standard

Auditor Discussion

In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:

1. Cobb County Adult Detention Center Pre-Audit Questionnaire
2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 Notifications to Other Confinement Facilities & Inmates (p 15)
3. PREA Sexual Assault Service Sheet (Confined Person Notification)

In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:

Specialized Staff (3)

1. Jail Commander
2. Investigator
3. Targeted Confined persons Who Reported a Sexual Abuse (3)

The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):

115.73 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 Notifications to Other Confinement Facilities & Inmates (p 15) requires confined persons who are house at Cobb County Adult Detention Center’s custody are informed whether the allegation was determined to be substantiated, unsubstantiated, or unfounded.

In response to the PAQ, the facility documented the number of confined persons who reported sexual abuse allegations are informed whether the allegation was determined to be substantiated, unsubstantiated, or unfounded.

The number of criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the agency/facility in the past 12 months: 4

Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of inmates who were notified, verbally or in writing, of the results of the investigation: 28

The interviews with the facility investigator and Jail Commander confirmed this to be the standard practice.

115.73 (b). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 Notifications to Other Confinement Facilities & Inmates (p 15) states, if the investigation was conducted by another agency, the PREA Coordinator shall request the relevant information from the investigating agency in order to inform the inmate.

115.73 (c). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 Notifications to

Other Confinement Facilities & Inmates (p 15) requires confined persons who are in Cobb County Adult Detention Center custody are informed whether the allegation was determined to be substantiated, unsubstantiated, or unfounded. All notifications or attempted notifications are to be documented by the appointing authority. Cobb County Adult Detention Center utilizes the PREA Sexual Assault Service Sheet Form to inform confined persons of the outcomes of investigations.

If the allegations involved a staff member, the staff making the notification will inform the confined person whenever:

- The staff is no longer posted in the institution.
- The staff is no longer employed at the institution.
- The staff has been indicted on a charge related to sexual abuse with the institution or the staff has been convicted on a charge related to sexual abuse within the institution.

In response to the PAQ, the facility reported substantiated or unsubstantiated complaints of sexual abuse committed by a staff member against a confined person in the past 12 months: 0

Policy is in place and staff are aware of the investigation protocols the practice of notifying confined persons of the staff member's status.

115.73 (d). Policy requires if the allegation involved another confined person, staff are required to inform the alleged victim when the alleged abuser has been:

- Indicted on a charge related to sexual abuse within the institution.
- The alleged abuser has been convicted on a charge related to sexual abuse within the institution.
- If the inmate has been exonerated of charges.

115.73 (e). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.08 Notifications to Other Confinement Facilities & Inmates (p 15), policy requires all notifications or attempted notifications are to be documented and maintained in the institutional file.

In response to the PAQ confined persons notified following the conclusion of an investigation alleging abused. Investigations file reviewed contained evidence of the notification to the confined person.

In the past 12 months, the number of notifications to inmates that were provided pursuant to this standard: 28

Of those notifications made in the past 12 months, the number that was documented: 28

115.73 (f): An agency's obligation to report under this standard shall terminate if the inmate is released from the agency's custody.

Upon the victim's release from custody, notification requirements end. If an inmate inquiries about the status of the investigation, inmate shall be notified of the status.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.73 based upon documentation provided and interviews

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| | <p>conducted.</p> |
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Corrective Action: (None)

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| 115.76 | Disciplinary sanctions for staff |
| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.76 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27), addresses discipline for staff. Policy requires that staff who engage in sexual abuse with a confined person are banned from Cobb County Adult Detention Center and all other correctional institutions.</p> <p>115.76 (b). The presumptive disciplinary sanction for staff who engages in sexual abuse as noted on page 27 of Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions.</p> <p>In response to the PAQ, the facility reported staff from the facility violated sexual abuse or sexual harassment policies. And staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies.</p> <p>In the past 12 months, the number of staff from the facility who have violated agency sexual abuse or sexual harassment policies: 1</p> <p>In the past 12 months, the number of those staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies: 0</p> <p>115.76 (c). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) states, staff disciplinary actions for violations of this policy for acts other than actually engaging in sexual abuse shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.</p> <p>In response to the PAQ, the facility reported staff from the facility violated sexual abuse or sexual harassment policies. And staff from the facility that have been disciplinary sanctions for violations for violating agency sexual abuse or sexual harassment policies.</p> <p>In the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual</p> |

harassment policies (other than actually engaging in sexual abuse): 1

115.76 (d). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) states, all terminations for acts of sexual abuse or sexual harassment, or resignation in lieu of termination shall be reported to all relevant licensing and certification bodies.

All staff terminations for violations of Cobb County Adult Detention Center sexual abuse or sexual harassment policies, or resignations by staff members that would have been terminated, shall be reported to law enforcement agencies, unless the activity was clearly not criminal in nature. Appropriate licensing agencies and/or the Georgia Peace Officer Standards and Training Council will be notified. Staff is aware of the disciplinary sanctions for violating policy.

In response to the PAQ, the facility reported staff from the facility has been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies.

In the past 12 months, the number of staff from the facility that have been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies:
0

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.76 based upon documentation provided.

Corrective Action: (None)

115.77 Corrective action for contractors and volunteers

Auditor Overall Determination: Meets Standard

Auditor Discussion

In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:

1. Cobb County Adult Detention Center Pre-Audit Questionnaire
2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27)

In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:

Specialized Staff: (1)

1. Jail Commander

The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):

115.77 (a). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) states, any contractor or volunteer who engages in sexual abuse is prohibited from any further contact with inmates.

1. All relevant licensing or certification body shall be notified.
2. Violations of this policy for acts other than sexual abuse may result in the contractor or volunteer being prohibited from further contact with inmates.

In response to the PAQ, the facility indicated contractors or volunteers have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of confined persons.

In the past 12 months, the number of contractors or volunteers reported to law enforcement for engaging in sexual abuse of inmates: 0

115.77 (b). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) requires the facility to take appropriate remedial measures and consider whether to prohibit further contact with confined persons, in the case of any other violation of Cobb County Adult Detention Center sexual abuse or sexual harassment policies by a contractor or volunteer.

The interview with the Jail Commander confirmed any contractor or volunteer who violates GDOC sexual abuse and sexual harassment policies are prohibited from working with confined persons and removed from the facility.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.77 based upon documentation provided and interviews conducted.

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| | Corrective Action: (None) |
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| 115.78 | Disciplinary sanctions for inmates |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27 - 28) 3. Inmate Handbook <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (2)</p> <ol style="list-style-type: none"> 1. Jail Commander 2. Medical Staff <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.78 (a). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) requires confined persons are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the confined person engaged in confined person-on-confined person sexual abuse or a criminal finding of guilt for confined person-on-confined person sexual abuse.</p> <p>Cobb County Adult Detention Center prohibits all consensual sexual activity between confined persons, and confined persons may be subject to disciplinary action for such activity.</p> <p>In response to the PAQ, the facility reported their administrative and criminal findings of confined person- on-confined person sexual abuse have occurred at the facility during the past 12 months.</p> <p>In the past 12 months, the number of administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility: 0</p> <p>In the past 12 months, the number of criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility: 1</p> <p>The auditor reviewed one Sentencing Order for a Confined Person that violated policy; he was sentenced to 240 additional days of incarceration.</p> <p>115.78 (b). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) states, sanctions shall be</p> |

commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history and sanctions imposed for comparable offenses.

The interview with the Jail Commander confirmed sanctions are commensurate with the nature and circumstances of the abuse committed. Facility transfers, additional time added to a confined person's sentence and sanctions.

115.78 (c). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) requires the disciplinary process shall consider whether an inmate's mental ability or mental illness contributed to the inmate's behavior when determining the sanction imposed.

The interview with the Jail Commander confirmed the facility would take a confined person's mental disability or mental illness into consideration when determining sanctions after generating a discipline report.

The Jail Commander also noted there has been one disciplinary report written for confined person-on-confined person sexual abuse during this audit cycle.

115.78 (d). If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

The Cobb County Adult Detention Center does not offer therapy for confined persons who commit sexual abuse.

115.78 (e) Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 27) states, inmates may be disciplined for sexual contact with a staff member following a finding that the staff member did not consent to such contact.

In response to the PAQ, there were no disciplinary records to review for this audit cycle.

115.78 (f). Cobb County Adult Detention Center Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.15 Discipline and Sanctions (p 28) state, for the purpose of disciplinary action, a report of sexual abuse by an inmate made in good faith and based on a reasonable belief that the alleged conduct occurred shall not constitute false reporting or lying.

Additionally, any person who willfully and knowingly gives or causes a false report of sexual harassment will be subject to disciplinary action in accordance with policy 1-07-08.15 Discipline and Sanctions.

115.78 (g). An agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

In response to the PAQ, Cobb County Adult Detention Center prohibits all sexual activity between inmates. All instances of sexual contact between confined persons will be treated as non-consensual unless proven otherwise during the course of an investigation.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.78 based upon documentation provided and interviews conducted.

Corrective Action: (None)

115.81

Medical and mental health screenings; history of sexual abuse

Auditor Overall Determination: Meets Standard

Auditor Discussion

In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:

1. Cobb County Adult Detention Center Pre-Audit Questionnaire
2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (pp 22 - 23)

In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:

Specialized Staff (3)

1. Medical Staff
2. Mental Health Staff
3. Staff Responsible for Risk Screening
4. Confined Persons Who Disclosed Prior Sexual Victimization During Risk Screening (3)

In order to decide compliance determination, the following observations were made during my on-site tour of the facility:

Observation of the Initial Intake PREA process (N/A)

The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):

115.81 (a) (c) Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health (p 22) Care requires medical staff members ensures that an inmate who, during initial screening, alleges to have experienced sexual victimization while in an institutional setting or in the community, is offered medical or mental health care within fourteen (14) days of initial screening.

Upon arrival to the facility confined persons undergo an intake risk screening. If the risk screening indicates that a confined person experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, the confined person is offered a follow up meeting with medical and mental health. Confined persons can either accept or refuse a follow-up meeting with medical or mental health staff if they choose.

The interview with a staff member responsible for conducting risk screening indicated when confined persons disclose sexual victimization during intake; they are referred to mental health services for an evaluation within 14 days.

In response to the PAQ, the facility reported confined persons disclosed prior victimization during screening during the past 12 months preceding the audit.

In the past 12 months, the percent of inmates who disclosed prior victimization during screening who were offered a follow-up meeting with a medical or mental health practitioner: 5%

115.81 (b) Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health (p 22) Care requires medical staff members shall ensure that an inmate who, during initial screening, indicates that he/she previously perpetrated sexual abuse while in an institutional setting or in the community, is offered medical or mental health care within fourteen (14) days of initial screening.

In response to the PAQ, the facility reported confined persons disclosed prior victimization during screening during the past 12 months preceding the audit.

In the past 12 months, the percent of inmates who have previously perpetrated sexual abuse, as indicated during the screening, who were offered a follow-up meeting with a mental health practitioner: 1%

115.81 (c) Upon arrival to the facility, confined persons undergo an intake screening process. If risk screening results indicate that an confined person has a history of sexually assaultive behavior whether it occurred in an institutional setting or in the community, the confined person is offered a follow up meeting with medical or mental health care staff and referrals are generated. Confined persons can either accept or refuse a follow-up meeting with medical or mental health staff if they choose.

115.81 (d) Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (p 23) states, the Intake Supervisor, Watch Commander and PREA Coordinator shall be notified when a health care practitioner learns, as part of the initial health screening process, that an inmate has been the perpetrator or a victim of institutional sexual abuse. Screening information is limited to a need-to-know basis for staff, only for the purpose of treatment, security, management, and classification decisions. Documentation is both physically and electronically secured.

115.81 (e) Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (p 23) requires medical or mental health practitioners shall obtained informed consent from the inmate before reporting information about sexual victimization that did not occur in an institutional setting.

The interview with mental health staff indicated they must obtain consent from confined persons to report sexual victimization that did not occur in a prison or jail. There were zero confined persons interviewed who disclosed prior victimization.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.81 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.82 | Access to emergency medical and mental health services |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (pp 22-23) 3. Confined person Handbook, English and Spanish <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (3)</p> <ol style="list-style-type: none"> 1. SAFE/SANE 2. Medical Staff 3. PREA Compliance Coordinator 4. Targeted Confined persons Who Reported a Sexual Abuse (3) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.82 (a) & (c). Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (pp 22-23) states, inmate victims of sexual abuse shall be offered timely, unimpeded access to emergency medical treatment, crisis intervention services and emergency contraception and information on sexually transmitted diseases in accordance with professionally accepted standards of care.</p> <p>Medical and mental health services are offered on-site at Cobb County Adult Detention Center. Confined persons get immediate care when and as needed. The interviews with medical and mental health confirmed immediate care and crisis intervention for confined persons following an allegation of sexual abuse or prior victimization of sexual abuse.</p> <p>There were three (3) confined persons interviewed who reported sexual abuse at the facility to interview.</p> <p>115.82 (b). The initial responding Deputy to an allegation or incident of sexual abuse shall be responsible for the following:</p> <ol style="list-style-type: none"> 1. Separating the alleged victim from the alleged abuser. 2. Notify Medical Staff 3. If victim is treated medically, a Deputy shall stay with the victim until relieved. 4. Notify a supervisor 5. Preserving and protecting any crime scene until evidence can be collected. |

6. Requesting that the victim not take any actions that could destroy or compromise physical evidence, including, washing, and brushing teeth, changing clothes, urinating, defecating, drinking or eating.
7. Preventing the alleged abuser from taking any actions that may destroy or compromise physical evidence, including, washing, and brushing teeth, changing clothes, urinating, defecating, drinking or eating.
8. Recording initial statements and names of all individuals present or involved.

The interviews with seventeen (17) staff members confirmed they were all knowledgeable of first responder protocols and would be able to act accordingly in the event of an incident of sexual abuse. Specifically, they indicated the first action would protect the victim by separating the victim from the abuser. Other duties include preserving the scene so proper evidence could be collected for law evidence, i.e., changing clothes, brushing teeth, using the restroom. First responder security staff would also ensure the alleged abuser does not take any actions that could destroy evidence.

115.82 (c). Confined person victims of sexual abuse are offered timely information about and timely access to emergency sexually transmitted infections prophylaxis in accordance with Cobb County Adult Detention Center's Medical Management of Suspected Sexual Assault, Abuse or Harassment policy Cobb County Adult Detention Center Policy requires that when a confined person makes an allegation of sexual abuse, the confined person will be interviewed in private to determine the nature and timing of the assault and extent of physical injuries. First Aid and emergency treatment will be provided in accordance with good clinical judgment. If the assault occurred within the previous 72 hours, the confined person will be counseled regarding need for a medical evaluation to determine the extent of injuries and testing and treatment for sexually transmitted infections. If the confined person needs emergency care beyond the capability of the facility, he or she will be transported to the local hospital. The SANE and health care staff is utilized to provide the victim with information about access to emergency prophylactic treatment of sexually transmitted infections. The interview with medical staff verified these procedures.

115.82 (d). In response to the PAQ, the facility reported treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. In review of one investigative file for a confined person who alleged sexual abuse by a staff member, there was no indication that the confined person was expected to make payment for any services. The interview with the PREA Compliance Coordinator verified this information.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.82 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| <p>115.83</p> | <p>Ongoing medical and mental health care for sexual abuse victims and abusers</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.12 Medical and Mental Health Care (pp 22-23) 3. Confined person Handbook <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (3)</p> <ol style="list-style-type: none"> 1. SAFE/SANE 2. Medical Staff 3. PREA Compliance Coordinator 4. Targeted Confined persons Who Reported a Sexual Abuse (3) <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.83 (a). Cobb County Adult Detention Center Policies, 1-07-08.12 Medical and Mental Health Care (pp. 22-23) address the requirements of offering medical and mental health evaluations and treatment as clinically indicated to all confined persons who are victims of sexual assault.</p> <p>115.83 (b). Cobb County Adult Detention Center Policies, 1-07-08.12 Medical and Mental Health Care (pp. 22-23) address inmates who have been victimized by sexual abuse shall be offered medical and mental health evaluations and, as appropriate, follow-up treatments, including treatment plans.</p> <p>Interviews with medical and mental health personnel indicated individualized treatment plans are prepared for each victim, including future follow up care if indicated. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.</p> <p>115.83 (c). Cobb County Adult Detention Center Policies, 1-07-08.12 Medical and Mental Health Care (pp. 22-23) states, medical and mental health care provided shall be consistent with what is available in the community.</p> <p>The interviews with both medical and mental staff confirmed the level of care for</p> |
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confined persons receive at Cobb County Adult Detention Center is consistent with that of the community level of care. Interviews with a random sample of confined persons confirmed no issues or concerns with the medical and mental health departments.

115.83 (d). Pregnancy tests shall be provided to female victims of sexual abuse which involved vaginal penetration. Cobb County Adult Detention Center's policy provides specific actions required when a confined person alleges sexual abuse/ assault. It also requires that following a SANE Examination, the facility provider or designee is responsible for ordering prophylactic treatment for sexually transmitted infections as well as pregnancy prophylactics if applicable. A pregnancy test is offered and should be given prior to administering any medication.

115.83 (e). If pregnancy results from the sexual abuse, victims shall receive timely and comprehensive information about, and access to, lawful pregnancy related medical services.

115.83 (f). Victims shall be offered testing for sexually transmitted diseases as medically appropriate. A follow up visit by a clinician is required three working days following the exam.

115.83 (g). 1-07-08.12 Medical and Mental Health Care (pp. 22-23) address services to sexual abuse victims shall be provided at no cost to the victim regardless of the inmate cooperation

115.83 (h). Cobb County Adult Detention Center Policy requires that the facility attempt to conduct a mental health evaluation of all known confined person on confined person abusers within 60 days of becoming aware of such history and offer treatment as appropriate.

The interview with mental health staff confirmed they attempt to conduct mental health evaluations no later than 60 days after being notified of a confined person abuser.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.83 based upon documentation provided and interviews conducted.

Corrective Action: None

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| 115.86 | Sexual abuse incident reviews |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.16 PREA Data Collection and Review (p 28) 3. Cobb County Adult Detention Center’s Sexual Abuse Incident Review <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff (3)</p> <ol style="list-style-type: none"> 1. Jail Commander 2. PREA Compliance Coordinator 3. Incident Review Team <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.86 (a). Cobb County Adult Detention Center’s PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.16 PREA Data Collection and Review (p. 28) the Sheriff shall designate a “sexual abuse incident review team” to conduct a review of all sexual abuse investigations, upon their conclusion.</p> <p>In instances of sexual abuse, the facility is to conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation that is determined to be substantiated or unsubstantiated. The purposes of the reviews are to assess the facility’s PREA prevention, detection, and response efforts pursuant to the Sexual Abuse Incident Review. This review is conducted by the facility’s Sexual Abuse Incident Response Team. Investigations that are determined to be unfounded do not require incidents reviews.</p> <p>In response to the PAQ: In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only "unfounded" incidents: 22</p> <p>The facility reports 22 investigations determined to substantiate or unsubstantiated, 7 investigations were unfounded and did not require incident reviews.</p> <p>115.86 (b). Cobb County Adult Detention Center’s PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.16 PREA Data Collection and Review (p. 28) requires a sexual abuse incident review be completed at the conclusion of every sexual abuse investigation that is determined to be substantiated or unsubstantiated.</p> |

Policy stipulate incident reviews are conducted within 30 days.

In response to the PAQ: In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents: 15

115.86 (c). Cobb County Adult Detention Center's PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.16 PREA Data Collection and Review (p. 28), defines a facility's Sexual Abuse Incident Review Team is a team that consists of upper-level management representatives. The Sexual Abuse Incident Review Team allows for input from line supervisors, investigator, medical, mental health, facility victim advocate, and retaliation monitor.

The interview with Jail Commander indicated Incident Review procedure is in place and upper-level management participates in all reviews.

115.86 (d). Cobb County Adult Detention Center's PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.16 PREA Data Collection and Review (p. 28), Sexual Abuse Incident Review requires the incident review team to review the following:

1. Consider whether the allegation indicates a need for policy or practice change.
2. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity, gender identity, sexual orientation, gang affiliation or by group dynamics at the facility.
3. Examine the area in the facility where the incident allegedly occurred for anything that could possibly enable abuse.
4. Assess the adequacy of staffing levels in areas during different shifts.
5. Assess whether monitoring technology should be deployed or augmented.

In response to the PAQ, the facility reported fifteen (15) investigations of alleged sexual abuse were completed at the facility during the past 12 months.

The auditor reviewed the substantiated and unsubstantiated investigations and determined the appropriate investigations reviews were completed.

The interviews with the Jail Commander, PREA Compliance Coordinator and an incident review team member indicated the review team takes confined person race, sexual orientation and identification, possible gang affiliations or other group dynamics into consideration. Additionally, they determine whether physical barriers and staffing levels or lack of monitoring technology may have enabled abuse. Reports are submitted to the Jail Commander and PREA Compliance Coordinator.

115.86 (e). Cobb County Adult Detention Center's PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.16 PREA Data Collection and Review (p. 28) includes a section for improvements whereby the facility will implement

recommendations for improvement or will document the reason for not doing so.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.86 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.87 | Data collection |
| | <p data-bbox="256 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 557 297">Auditor Discussion</p> <p data-bbox="256 340 1436 416">In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol data-bbox="256 454 1426 696" style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.16 PREA Data Collection and Review (pp 28 & 29) 3. Bureau of Justice Statistics Survey of Sexual Victimization 4. Cobb County Adult Detention Center Annual Report (2021 and 2022) 5. Incident Demographic Report <p data-bbox="256 734 1415 810">The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p data-bbox="256 848 1477 1424">115.87 (a) (c). Cobb County Adult Detention Center collects accurate and uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions as required in their policy, Policy 1-07-08.00 Prison Rape Elimination Act (p 29). Data collection begins with each facility submitting a report to Cobb County Adult Detention Center’s PREA Analyst each month using the electronic spreadsheet provided by the PREA Coordinator. Facilities are required to submit the form via email no later than the fifth calendar day of the month following the reporting month. All allegations, including dispositions are to be included in the report. The incident-based data collected is based on the most recent version of the Survey of Sexual Violence (SSV) conducted by the US Department of Justice. The auditor reviewed Cobb County Adult Detention Center’s 2019 PREA Annual Report, available on the agency’s website. The data collected includes, minimally, the data necessary to answer the questions on the most recent Survey of Sexual Violence.</p> <p data-bbox="256 1462 1477 1621">115.87 (b) Cobb County Adult Detention Center publishes incident-based data in an annual report, comparing each year’s data, and provide an assessment of progress in addressing confined person sexual abuse as required in their policy, Policy 1-07-08.00 Prison Rape Elimination Act (p. 28).</p> <p data-bbox="256 1659 1477 1818">115.87 (d). Cobb County Adult Detention Center maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files and sexual abuse incident reviews as evidenced by its detailed and comprehensive PREA Annual Reports.</p> <p data-bbox="256 1856 1299 1933">115.87 (e). Cobb County Adult Detention Center does not contract for the confinement of confined persons.</p> <p data-bbox="256 1971 1477 2089">115.87 (f). The Cobb County Adult Detention Center’s PREA Unit provides, upon request, all such data from the previous calendar year to the Department of Justice no later than June 30th.</p> |

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| | <p>The auditor has determined current operations and practices meet the requirements of PREA Standard 115.87 based upon documentation provided and interviews conducted.</p> |
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Corrective Action: (None)

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| 115.88 | Data review for corrective action |
| | <p data-bbox="256 188 983 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 557 300">Auditor Discussion</p> <p data-bbox="256 340 1445 416">In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol data-bbox="256 456 1430 779" style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act - 1-07-08.16 PREA Data Collection and Review (p 29) 3. Policy 1-07-08.00 Prison Rape Elimination Act 4. Cobb County Adult Detention Center Annual PREA Report (2021-2022) 5. Department of Justice (DOJ) Survey of Sexual Victimization (SSV-2) State Prisons Systems Summary Form 6. Agency Website: www. https://www.cobbsheriff.org <p data-bbox="256 819 1453 896">In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p data-bbox="256 936 552 972">Specialized Staff: (2)</p> <ol data-bbox="256 1012 544 1088" style="list-style-type: none"> 1. Jail Commander 2. PREA Coordinator <p data-bbox="256 1128 1414 1205">The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p data-bbox="256 1245 1469 1688">115.88 (a). In response to the PAQ, the facility reported its agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. PREA policy, Policy 1-07-08.00 Prison Rape Elimination Act (p. 28) stipulates the agency will review aggregated data collected of all sexual abuse allegations in order to improve staff performance, identify problem areas, and improve facility operations and confined person sexual safety. The incident-based data includes data to answer all the questions from the most recent version of the Department of Justice Survey of Sexual Violence (SSV-2). The review consists of identifying problem areas, on-going corrective action and the preparation of the annual report. The annual report will include findings and any necessary corrective action.</p> <p data-bbox="256 1729 1445 1886">Interviews with the Jail Commander and PREA coordinator confirmed the use of incident-based sexual abuse data is a process of annual review and taking on-going corrective action to determine how data can improve the quality of service and improve confined person and staff sexual safety.</p> <p data-bbox="256 1926 1461 2038">115.88 (b). Reports shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.</p> |

The analysis is attributed to the following factors; Increased education in the definitions of what does, and does not meet the definition of PREA; A significant decrease in the use of the PREA Hotline to report false allegations; Process improvements and prevention training; and Improvements in investigative procedures. The auditor determined the reports contained all required information pursuant to this provision.

115.88 (c). The interview with the Jail Commander (designee) indicated the Jail Commander approves all PREA Annual Reports prior to posting on the agency's website. The auditor reviewed the agency website, <https://www.cobbsheriff.org/> and located Annual PREA Reports from 2021 to 2022

115.88 (d). The interview with the agency's PREA Coordinator confirmed any information that would compromise the confidentiality of reported information and any information that would breach the safety and security of Cobb County Adult Detention Center staff, and/or confined persons would be redacted. Redacted information can include, but is not limited to personal identifiers for confined persons and staff, specific incident locations, facility schematics etc.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.88 based upon documentation provided and interviews conducted.

Corrective Action: (None)

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| 115.89 | Data storage, publication, and destruction |
| | <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none"> 1. Cobb County Adult Detention Center Pre-Audit Questionnaire 2. Policy 1-07-08.00 Prison Rape Elimination Act 1-07-08.16 PREA Data Collection and Review (p 29) 3. PREA Coordinator Data Storage Secure File Cabinet Picture <p>In order to decide compliance determination, the following people were interviewed, and the following interview findings were considered:</p> <p>Specialized Staff: (1) PREA Coordinator</p> <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>115.89 (a). In response to the PAQ, the facility indicated Cobb County Adult Detention Center is required to securely maintain all collected and aggregated data. The interview with the PREA Coordinator confirmed the PREA Unit gathers intelligence from facility reports that are sent directly to the PREA unit staff. The PREA Unit maintains the records, electronically, on a secure network drive.</p> <p>115.89 (b). In response to the PAQ, the facility indicated Cobb County Adult Detention Center Agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public, at least annually, through its website. The auditor reviewed the 2020 and 2021 Annual PREA Reports on the agency's website.</p> <p>115.89 (c). In response to the PAQ, the facility indicated the agency is required to remove all personal identifiers prior to publishing the aggregated data on its public website. The auditor reviewed the agency's website and reviewed the 2020, and 2021 Annual PREA Reports and found no personal identifiers.</p> <p>115.89 (d). Policy 1-07-08.00 Prison Rape Elimination Act (p. 29) requires retention of PREA related documents and investigations to be securely retained for at least 10 years from the date of the initial report. The agency's website contains historical PREA reports.</p> <p>The auditor has determined current operations and practices meet the requirements of PREA Standard 115.89 based upon documentation provided and interviews conducted.</p> <p>Corrective Action: (None)</p> |

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| 115.401 | Frequency and scope of audits |
| | <p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 1461 416">In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <p data-bbox="280 456 453 492">Documents:</p> <ol data-bbox="280 528 1469 604" style="list-style-type: none"> <li data-bbox="280 528 1177 564">1. Cobb County Adult Detention Center Pre-Audit Questionnaire <li data-bbox="280 568 1469 604">2. Cobb County Adult Detention Center Agency Website https://www.cobbsheriff.org <p data-bbox="280 680 1437 757">The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p data-bbox="280 792 1481 1120">115.401 (a). Cobb County Adult Detention Center ensures that 1/3 of their prisons are audited each year for compliance with the PREA Standards each year so that at the end of the 3-year cycle, all prisons have been audited. The Cobb County Adult Detention Center was previously audited for compliance with the PREA Standards October 2019. The auditor reviewed the agency’s website, https://www.cobbsheriff.org, and verified Cobb County Adult Detention Center had a PREA audit in May 2021. The PREA Coordinator also relayed to the auditor that all Cobb County Adult Detention Center facilities are undergoing 1st Cycle PREA audits.</p> <p data-bbox="280 1155 1481 1357">Cobb County Adult Detention Center Policy, Prison Rape Elimination Act-PREA, (p 29) addresses the requirement that the Department will conduct audits pursuant to 28 C.F.R/ 114.401-405. The Department will be audited every three years. The Cobb County Adult Detention Center does not contract with the county or private facilities.</p> <p data-bbox="280 1393 1469 1514">The auditor reviewed the agency’s website and verified Cobb County Adult Detention Center had a PREA audit in Oct 2019. The auditor noted the report on the agency website.</p> <p data-bbox="280 1550 1453 1626">115.401 (b). The auditor reviewed the agency’s website; and verified Cobb County Adult Detention Center had PREA audits in 2017, and 2019.</p> <p data-bbox="280 1662 1458 1738">The auditor reviewed the Cobb County Adult Detention Center website; all facility's PREA audits reports are posted on the site to include Annual PREA Reports.</p> <p data-bbox="280 1751 1445 1827">115.401 (h). The auditor was provided unfettered access to all areas of the facility during this PREA audit.</p> <p data-bbox="280 1877 1469 1998">During the site review, the auditor had access to the entire facility. The auditor was accompanied by staff members during the site review. The auditor tested phones to confirm they were operational.</p> <p data-bbox="280 2033 1430 2069">PREA signage was posted throughout the facility. Audit Notices were observed in</p> |

common areas accessible to confined persons. Two (2) confined persons corresponded with the auditor via USA mail prior to the on-site audit. Both confined persons were interviewed during the audit. The auditor received no correspondence from staff, contractors, volunteers, or outside interested party.

Twenty-nine (29) confined persons were informally interviewed during the site review, all interviewed could name multiple ways to reports sexual abuse and sexual harassment.

115.401 (i). The auditor received documents as requested, including those stored electronically. The PREA Compliance Manager provided additional documents and policies on flash drives in addition to the information uploaded in the online PRE-Audit Questionnaire.

The auditor requested additional documentation for clarification during the report writing phase. The auditor requested additional documentation to confirm Sexual Abuse Incident Reviews were completed within 30 days of completion of investigations. The information was provided as requested.

115.401 (m). The auditor was provided a space for private, uninterrupted interviews with confined persons, contractors, security staff, and administrative staff during on-site portion of the PREA audit; all persons interviewed were forthcoming. Staff assisted the auditor by ensuring confined persons were readily available for interview.

115.401 (n). Confined persons were not prohibited from sending confidential information or correspondence to the auditor, unopened and sealed.

The auditor sent Audit Notices to the facility 45 days prior to the on-site audit. The auditor received confirmation via email with photos of the posting of the Audit Notices. During the site review, the auditor observed Audit Notices posted throughout the facility in areas accessible to confined persons, visitors, contractors, volunteers, and staff.

The auditor has determined current operations and practices meet the requirements of PREA Standard 115.401 based upon documentation provided.

Corrective Action: (None)

| 115.403 | Audit contents and findings |
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| | Auditor Overall Determination: Meets Standard |
| | Auditor Discussion |
| | <p>In order to determine compliance for this standard, the following policies and other documentation were reviewed for standard:</p> <ol style="list-style-type: none">1. Pre-Audit Questionnaire (PAQ)2. Cobb County Adult Detention Center website; https://www.cobbsheriff.org <p>The following describes how the evidence above was used to draw the conclusion regarding compliance (By Provision):</p> <p>The agency PREA Coordinator ensures that all PREA Reports are published on the agency's website within 90 days of the completion of the report. Reports for all facilities for all reporting periods are posted on the agency's website, https://www.cobbsheriff.org and are easily accessible to the public. The auditor reviewed the Agency's website and reviewed the previous PREA reports, as well as, annual reports that were posted on the website.</p> <p>The auditor has determined current operations and practices meet the requirements of PREA Standard 115.403 based upon documentation provided.</p> <p>Corrective Action: (None)</p> |

| Appendix: Provision Findings | | |
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| 115.11 (a) | Zero tolerance of sexual abuse and sexual harassment; PREA coordinator | |
| | Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? | yes |
| | Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? | yes |
| 115.11 (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.) | yes |

| 115.12 (b) | Contracting with other entities for the confinement of inmates | |
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| | Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) | yes |

| 115.13 (a) | Supervision and monitoring | |
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| | 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? | na |
| | In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any applicable State or local laws, regulations, or standards? | yes |
| | In calculating adequate staffing levels and determining the need | yes |

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

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

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| 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 facility does not have female inmates.) | yes |
| 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 | |
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| | 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 | |
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| | 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 |

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| | 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 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 |
| | 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 |

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| 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 |

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| 115.17 (h) | Hiring and promotion decisions | |
| | Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.) | 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 | | |
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| | Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) | yes |
| | Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) | yes |
| 115.21 (c) Evidence protocol and forensic medical examinations | | |
| | Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate? | yes |
| | Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? | yes |
| | If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? | yes |
| | Has the agency documented its efforts to provide SAFEs or SANEs? | yes |
| 115.21 (d) Evidence protocol and forensic medical examinations | | |
| | Does the agency attempt to make available to the victim a victim advocate from a rape crisis center? | yes |
| | If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.) | na |
| | Has the agency documented its efforts to secure services from rape crisis centers? | yes |

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| 115.21 (e) | Evidence protocol and forensic medical examinations | |
| | As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews? | yes |
| | As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals? | yes |
| 115.21 (f) | Evidence protocol and forensic medical examinations | |
| | If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.) | yes |
| 115.21 (h) | Evidence protocol and forensic medical examinations | |
| | If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.) | yes |
| 115.22 (a) | Policies to ensure referrals of allegations for investigations | |
| | Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse? | yes |
| | Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment? | yes |
| 115.22 (b) | Policies to ensure referrals of allegations for investigations | |
| | Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? | yes |
| | Has the agency published such policy on its website or, if it does not have one, made the policy available through other means? | yes |
| | Does the agency document all such referrals? | yes |

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| 115.22 (c) | Policies to ensure referrals of allegations for investigations | |
| | If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).) | yes |
| 115.31 (a) | Employee training | |
| | Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? | yes |
| | Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures? | yes |
| | Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment? | yes |
| | Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment? | yes |
| | Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? | yes |
| | Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? | yes |
| | Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse? | yes |
| | Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? | yes |
| | Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates? | yes |
| | Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities? | yes |

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| 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 |

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| 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 |

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| 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 Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |
| | Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |
| | Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |

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| 115.34 (c) | Specialized training: Investigations | |
| | Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) | yes |
| 115.35 (a) | Specialized training: Medical and mental health care | |
| | Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) | yes |
| | Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) | yes |
| | Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) | yes |
| | Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.) | yes |
| 115.35 (b) | Specialized training: Medical and mental health care | |
| | If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.) | na |

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| 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 screening instrument? | yes |

| 115.41 (d) | Screening for risk of victimization and abusiveness | |
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| | 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) Whether the inmate is detained solely for civil immigration purposes? | yes |

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| 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 information is not exploited to the inmate's detriment by staff or other inmates? | yes |

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| 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 present management or security problems? | yes |

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| 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 solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.) | yes |

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

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| 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 |

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| 115.51 (b) | Inmate reporting | |
| | Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? | yes |
| | Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials? | yes |
| | Does that private entity or office allow the inmate to remain anonymous upon request? | yes |
| | Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.) | na |
| 115.51 (c) | Inmate reporting | |
| | Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties? | yes |
| | Does staff promptly document any verbal reports of sexual abuse and sexual harassment? | yes |
| 115.51 (d) | Inmate reporting | |
| | Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates? | yes |
| 115.52 (a) | Exhaustion of administrative remedies | |
| | Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse. | yes |

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| 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 this standard.) | yes |
| | Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) | yes |
| 115.52 (d) | Exhaustion of administrative remedies | |
| | Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.) | yes |
| | If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.) | yes |
| | At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.) | yes |

| 115.52 (e) | Exhaustion of administrative remedies | |
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| | 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 | |
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| | 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 |

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| 115.53 (a) | Inmate access to outside confidential support services | |
| | Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? | yes |
| | Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.) | na |
| | Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? | yes |
| 115.53 (b) | Inmate access to outside confidential support services | |
| | Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws? | yes |
| 115.53 (c) | Inmate access to outside confidential support services | |
| | Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse? | yes |
| | Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements? | yes |
| 115.54 (a) | Third-party reporting | |
| | Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment? | yes |
| | Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate? | yes |

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| 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 abuse or sexual harassment or retaliation? | yes |
| 115.61 (b) | Staff and agency reporting duties | |
| | Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions? | yes |
| 115.61 (c) | Staff and agency reporting duties | |
| | Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section? | yes |
| | Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services? | yes |
| 115.61 (d) | Staff and agency reporting duties | |
| | If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws? | yes |
| 115.61 (e) | Staff and agency reporting duties | |
| | Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators? | yes |

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| 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 |

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| 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 response to an incident of sexual abuse? | yes |

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| 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? | no |
| 115.67 (a) | Agency protection against retaliation | |
| | Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff? | yes |
| | Has the agency designated which staff members or departments are charged with monitoring retaliation? | yes |
| 115.67 (b) | Agency protection against retaliation | |
| | Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations? | yes |

| 115.67 (c) | Agency protection against retaliation | |
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| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff? | yes |
| | Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff? | yes |
| | Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? | yes |

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| 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 of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).) | yes |
| | Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).) | yes |
| 115.71 (b) | Criminal and administrative agency investigations | |
| | Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34? | yes |
| 115.71 (c) | Criminal and administrative agency investigations | |
| | Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data? | yes |
| | Do investigators interview alleged victims, suspected perpetrators, and witnesses? | yes |
| | Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator? | yes |

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| 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 |

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

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| 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 abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility? | yes |
| 115.73 (e) | Reporting to inmates | |
| | Does the agency document all such notifications or attempted notifications? | yes |

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| 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 |

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| 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? | no |
| 115.78 (e) | Disciplinary sanctions for inmates | |
| | Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? | yes |
| 115.78 (f) | Disciplinary sanctions for inmates | |
| | For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? | yes |
| 115.78 (g) | Disciplinary sanctions for inmates | |
| | If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.) | yes |

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| 115.81 (a) | Medical and mental health screenings; history of sexual abuse | |
| | If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison). | yes |
| 115.81 (b) | Medical and mental health screenings; history of sexual abuse | |
| | If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.) | yes |
| 115.81 (c) | Medical and mental health screenings; history of sexual abuse | |
| | If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail). | yes |
| 115.81 (d) | Medical and mental health screenings; history of sexual abuse | |
| | Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law? | yes |
| 115.81 (e) | Medical and mental health screenings; history of sexual abuse | |
| | Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18? | yes |

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| 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 |

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| 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 |

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| 115.83 (h) | Ongoing medical and mental health care for sexual abuse victims and abusers | |
| | If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.) | yes |
| 115.86 (a) | Sexual abuse incident reviews | |
| | Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded? | yes |
| 115.86 (b) | Sexual abuse incident reviews | |
| | Does such review ordinarily occur within 30 days of the conclusion of the investigation? | yes |
| 115.86 (c) | Sexual abuse incident reviews | |
| | Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners? | yes |

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| 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 |

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

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| 115.88 (d) | Data review for corrective action | |
| | Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility? | yes |
| 115.89 (a) | Data storage, publication, and destruction | |
| | Does the agency ensure that data collected pursuant to § 115.87 are securely retained? | yes |
| 115.89 (b) | Data storage, publication, and destruction | |
| | Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means? | yes |
| 115.89 (c) | Data storage, publication, and destruction | |
| | Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available? | yes |
| 115.89 (d) | Data storage, publication, and destruction | |
| | Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? | yes |
| 115.401 (a) | Frequency and scope of audits | |
| | During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.) | yes |

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