

PREA Facility Audit Report: Final

Name of Facility: Richmond City Justice Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 04/11/2026

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Alton Baskerville	Date of Signature: 04/11/2026

AUDITOR INFORMATION	
Auditor name:	Baskerville, Alton
Email:	alton.abm@preaauditors.com
Start Date of On-Site Audit:	02/16/2026
End Date of On-Site Audit:	02/18/2026

FACILITY INFORMATION	
Facility name:	Richmond City Justice Center
Facility physical address:	1701 Fairfield Way , Richmond , Virginia - 23223
Facility mailing address:	

Primary Contact

Name:	Sergeant Jay'Neka Stancel
Email Address:	Jay'neka.Stancel@rva.gov
Telephone Number:	8046463358

Warden/Jail Administrator/Sheriff/Director	
Name:	Dr. Antionette V. Irving
Email Address:	Antionette.Irving@rva.gov
Telephone Number:	804-646-0140

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

Facility Health Service Administrator On-site	
Name:	Danielle Williams
Email Address:	Danielle.Williams2@rva.gov
Telephone Number:	804-646-0040

Facility Characteristics	
Designed facility capacity:	1332
Current population of facility:	630
Average daily population for the past 12 months:	661
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both women/girls and men/boys

Age range of population:	18-75
Facility security levels/inmate custody levels:	Low, Medium, & High
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	325
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	80
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	15

AGENCY INFORMATION	
Name of agency:	Richmond City Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	1701 Fairfield Way , Richmond , Virginia - 23223
Mailing Address:	
Telephone number:	

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

Agency-Wide PREA Coordinator Information			
Name:	Jay'Neka Stancel	Email Address:	jay'neka.stancel@rva.gov

Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

0

Number of standards met:

45

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

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

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-02-16
2. End date of the onsite portion of the audit:	2026-02-18

Outreach

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

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1032
15. Average daily population for the past 12 months:	661
16. Number of inmate/resident/detainee housing units:	34
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	574
25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	12
26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	39
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	7
30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	4

<p>31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>3</p>
<p>32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>5</p>
<p>33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>2</p>
<p>34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>The facility could not track the number and characteristics of various inmate groups.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>325</p>
<p>37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>15</p>

38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	80
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	Facility staff was unable to list exact number of volunteers on first day of audit.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	16
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input 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
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Inmates were selected from all housing units.
43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No

44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	There were no barriers to interviewing the random or targeted inmates.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	16
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	3
48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	2
49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	0

<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>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>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>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>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>2</p>

<p>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>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>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>4</p>
<p>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>4</p>

<p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>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>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No additional comments noted.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>58. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>

<p>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>If "Other," describe:</p>	<p>Female staff were interviewed due to their significant representation in the supervisory field.</p>
<p>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>Random staff from all shifts were interviewed.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>19</p>
<p>63. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
65. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
66. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

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

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.

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

<p>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>Random staff from all shifts were interviewed.</p>
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Documentation Sampling

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

<p>77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>Twelve random confined persons record files were selected for review. Also, twelve employee record files were randomly selected and reviewed.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	4	0	0	0
Staff-on-inmate sexual abuse	1	0	1	0
Total	5	0	1	0

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	4	0	0	0
Staff-on-inmate sexual harassment	3	0	3	0
Total	7	0	3	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	2	2	0
Staff-on-inmate sexual harassment	0	1	2	0
Total	0	3	4	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

5

<p>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>4</p>
<p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative 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 abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>7</p>
<p>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>
<p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input 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>

Staff-on-inmate sexual harassment investigation files	
98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	3
99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	Files were thorough and easy to review.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS who provided assistance at any point during this audit:	1

Non-certified Support Staff

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

- Yes
 No

a. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:

1

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

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

Standards	
Auditor Overall Determination Definitions	
<ul style="list-style-type: none"> • Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions) 	
Auditor Discussion Instructions	
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>	

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy #129 Prison Rape Elimination Act (PREA) 12/2025 • PREA Richmond City Justice Center Detecting, Preventing, and Responding Outline • Organizational Chart • Staff Interviews • Confined Persons <p>Auditor’s Discussion:</p> <p>Policy #129</p> <p>I. POLICY</p> <p>The Richmond City Sheriff's Office will establish standards as defined by the Prison Rape Elimination Act of 2003. These standards have been established for the reduction and punishment of sexual abuse of inmates; to address the safety and treatment needs of inmates, who have been a victim of a sexual act, and to discipline and prosecute those who perpetrate these acts upon inmates. The Richmond City</p>

Sheriff's Office has a zero tolerance towards all forms of sexual abuse and sexual harassment in its facilities.

The Richmond City Sheriff's Office is committed to the safety of all inmates within the facility. The department also has a zero-tolerance for sexual abuse and/or sexual harassment involving inmate-on-inmate behaviors and staff-on-inmate behaviors.

The Department will respond to all reports of sexualized behavior or abuse as nonconsensual, regardless of perception, rumor, appearance, or participant disclosure. The policy will be reviewed every twelve (12) months by all personnel. The review shall be documented.

II. PURPOSE

The purpose of this policy is to eliminate all forms of sexual abuse and sexual harassment of inmates within the Richmond City Sheriff's Office.

Analysis/Reasoning:

The Auditor reviewed policies and procedures, organizational chart, and interviewed staff and confined persons to verify the facility's level of compliance with this standard. The facility's zero tolerance policy outlines prevention, detection and response approaches towards sexual abuse and sexual harassment. Prevention efforts include architectural design, environmental controls, supervision strategies, confined persons movement practices, accessible and non-accessible facility areas, education efforts, and staff training.

Detection efforts include around the clock supervision, unannounced supervisory security rounds, staff prohibited from alerting other staff of supervisory security rounds, not relinquishing care and custody of confined persons, requirements of documenting observations, staff prohibited from visiting other posts, encouraging confined persons and requiring staff to report knowledge or suspicion of sexual abuse or sexual misconduct, and allowing staff to accept third party reports of allegations.

Response efforts include maintaining multiple ways for confined persons to privately report allegations or retaliation, notifications of allegations to other agencies, protection methods, retaliation monitoring, investigating all allegations, reporting criminal acts of sexual abuse and sexual harassment to local law enforcement, notifying victims of investigative findings, conducting incident reviews, disciplinary action for abusers, and employing a PREA Coordinator.

Interviews with the PREA Coordinator reveal there is sufficient time and authority to manage the facility's PREA efforts. The PREA Coordinator responded quickly and efficiently to all communications and requests from the auditor both before and during the audit.

Interviews with confined persons reveal the facility has accomplished a zero-tolerance culture towards sexual abuse and sexual harassment. All confined persons interviewed were knowledgeable in the facility's PREA prevention, detection and response efforts. Confined persons felt confident in staff's ability to respond to allegations of sexual abuse and sexual harassment. All confined persons felt safe in the facility.

	<p>Conclusion:</p> <p>Richmond City Justice Center maintains an appropriate policy and has successfully created a zero-tolerance culture. The Auditor determined the facility meets the requirements of this standard after a thorough review of policy and procedures, organizational chart, and interviewing staff and confined persons.</p>
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115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • RCJC Pre-Audit Questionnaire • Interview with PREA Coordinator • Interview with Superintendent <p>The Auditor determined the Richmond City Justice Center does not contract for the confinement of its confined persons. The agency has not entered into or renewed a contract for the confinement of confined persons on or after August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>The Auditor determined the Richmond City Justice Center meets the requirements of this standard.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Supervision and Monitoring - PREA 115.13 • Staffing Plan Process • Unannounced Rounds Log • Interviews with Staff • Interviews with Confined Persons • Observations <p>Auditor's Discussion:</p> <p>Policy Supervision and Monitoring</p> <p>The Richmond City Justice Center has a policy which requires the facility to comply with a staffing plan that provides for adequate levels of staffing and video monitoring</p>

in an effort to protect confined persons against sexual abuse. Facility policy requires the following considerations when determining staffing levels and video monitoring needs:

- Generally accepted detention and correctional practices;
 - Any judicial findings of inadequacy;
 - Any findings of inadequacy from federal investigative agencies;
 - Any findings of inadequacy from internal or external oversight bodies;
 - All components of the facility's physical plant (including "blind-spots" or areas where staff or confined persons may be isolated);
 - The composition of the confined persons population;
 - The number and placement of supervisory staff;
 - Institutional programs occurring on a particular shift
 - Any applicable state or local laws, regulations, or standards;
 - The prevalence of substantiated and unsubstantiated incidents of sexual abuse;
- and
- Any other relevant factors.

Analysis/Reasoning:

Facility staff is required by policy to document and justify any deviations from the staffing plan when the staffing plan is not complied with. The facility (in consultation with the PREA Coordinator) is required by policy to assess, determine, and document whether adjustments are needed at least once each year. Policy stipulates the review to determine if adjustments are needed to the following:

- The staffing plan;
- The facility's deployment of video monitoring systems and other monitoring technologies; and
- The resources the facility has available to commit to ensure adherence to the staffing plan.

Policy requires Supervisors on each shift to conduct unannounced security rounds to identify and deter staff sexual abuse and sexual harassment. The requirement applies to both day and night shifts. Staff are prohibited from alerting other staff that supervisory rounds are occurring, unless such announcements are related to legitimate operational functions of the facility.

There are no deviations from the staffing plan. The facility has not had any deployment of video monitoring systems or any other monitoring technologies.

Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of confined persons is 1068. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of confined persons on which the staffing plan was predicated is 1068.

Conclusion:

The Auditor concluded the facility has an adequate staffing plan to ensure the protection of confined persons from sexual abuse. The Auditor reviewed policy and procedures, RCJC Staffing Plan, Unannounced Rounds, Daily Assignment Sheets, meeting minutes with attendance roster, made observations, and conducted

	interviews with staff and confined persons. The facility conducts an annual staffing plan review as required by this standard. The Auditor determined the Richmond City Justice Center meets the requirements of this standard.
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115.14	Youthful inmates
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <hr/> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Confined Youth - PREA 115.14 • Population Reports • Interviews with staff • Observations <p>The Auditor conducted formal and informal interviews with staff. Staff informed the Auditor they have not incarcerated a confined youth at the Richmond City Justice Center.</p> <p>Conclusion:</p> <p>The Auditor made observations, reviewed agency policies and procedures, population reports, and interviewed staff to determine the facility meets the requirements of this standard. The Richmond City Justice Center has not housed confined youths during this audit period.</p>

115.15	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <hr/> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Limits to Cross-Gender Viewing/Searching - PREA 115.15 • Search Training Logs • Interviews with Confined Persons • Interviews with Staff • Observations <p>Auditor's Discussion:</p>

Policy - Limits to Cross-Gender Viewing/Searching

(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.

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

Procedure

1. Deputies will not conduct cross gender strip searches or cross-gender visual body cavity searches (anal or genital opening) except in exigent circumstances or when performed by a medical practitioner.

Analysis/Reasoning:

In the past 12 months, there were 0 number of cross-gender strip or cross-gender visual body cavity searches of confined persons. In the past 12 months, there were 0 number of cross-gender strip or cross-gender visual body cavity searches of confined persons that did not involve exigent circumstances or were performed by non-medical staff.

The facility houses both male and female confined persons. There were (0) number of pat-down searches of female confined persons that were conducted by male staff. There were (0) number of pat-down searches of female confined persons conducted by male staff that did not involve exigent circumstance(s).

The Richmond City Justice Center does 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.

The Richmond City Justice Center conducts searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

The Richmond City Justice Center has policies and procedures that enable 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. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit.

Policy and observations show that officers of the same gender as the offenders are assigned tower posts that are adjacent to restrooms and shower areas. Thus, confined persons are not viewed by officers of the opposite gender while using the toilets and showers.

One hundred percent (100%) of all security staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex inmates in

	<p>a professional and respectful manner, consistent with security needs (the percentage given does not necessarily indicate compliance or non-compliance with the standard).</p> <p>Conclusion:</p> <p>The Richmond City Justice Center does 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 is determined during conversations with the confined person, 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. The Auditor determined the Richmond City Justice Center meets the requirements of this standard.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <hr/> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Disabilities/Limited English Proficient - PREA 115.16 • PREA Lesson Plan • Break the Silence Memo (English/Spanish) • Purple Communications • Certified Languages International Agreement • Interviews with Staff • Interviews with Confined Persons • Observations <p>Auditor's Discussion:</p> <p>Policy - Disabilities/Limited English Proficient</p> <p>(a) The agency shall take appropriate steps to ensure that inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with inmates who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, the agency shall ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental</p>

alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans With Disabilities Act, 28 CFR 35.164.

The agency shall 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, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

(c) The agency shall not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under § 115.64, or the investigation of the inmate's allegations.

Analysis/Reasoning:

Richmond City Justice Center ensures confined persons with disabilities and who are limited English proficient have access to PREA information and programs. Richmond City Justice Center has taken appropriate steps to ensure that confined persons who are limited English proficient or disabled have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

The auditor used the language line that provides foreign language translation to the jail for one of the confined persons interviews. PREA handouts and confined persons handbooks are in English and Spanish. English and Spanish PREA posters are posted throughout the institution. Staff and confined persons interviewed stated confined persons are not used as interpreters when addressing sexual abuse and sexual harassment allegations.

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

Conclusion:

The Auditor was able to conclude the facility provides information that ensures equal opportunity to confined persons who are disabled. The facility takes reasonable steps to ensure meaningful access to all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment are provided to confined persons who are limited English proficient. The Auditor conducted a thorough review of the facility's policies and procedures, PREA Brochure, comprehensive educational video, made observations, and interviewed staff and confined persons and determined the facility meets the requirements of this standard.

115.17 Hiring and promotion decisions

Auditor Overall Determination: Meets Standard

Auditor Discussion

Policy, Materials, Interviews and Other Evidence Reviewed

- Policy - Hiring and Promotion Decisions - PREA 115.17
- Criminal History Background Checks Memo
- Panel Interview Questionnaire
- Applicant Preliminary Interview Questionnaire
- Employee Records
- Interviews with Staff

Auditor's Discussion:

The Richmond City Justice Center policy prohibits hiring or promoting anyone or enlisting the services of any contractor, who may have contact with confined persons 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);
- Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse: or
- Has been civilly or administratively adjudicated to have engaged in sexual activity.

Facility policy requires considerations of any incident of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with confined persons. The policy requires a criminal background record check and an attempt to contact prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. Criminal background records checks are required every 5 years on employees and contract staff, who may have contact with confined persons.

Analysis/Reasoning:

The Auditor observed evidence a criminal background check was conducted on all (12) random staff. In addition, the Auditor observed records revealing a criminal record background check was conducted on all staff. The Auditor reviewed the facility's record keeping of criminal background checks. Verification was made of all staff, contractor, and volunteer background record checks performed. A facility investigator conducts a criminal records background check through the Virginia Criminal Information Network (VCIN) and National Crime Information Center (NCIC). All criminal records background checks conducted through the VCIN Terminal are logged into a logbook by facility staff. All names run through the system are electronically logged by the Virginia State Police. The Investigator performs annual checks on all deputies during their birth month. Verification of the criminal

	<p>background checks is sent to the PREA Coordinator. Contract personnel and volunteers undergo a criminal background record checks every 5 years. These criminal record checks are conducted by a facility investigator.</p> <p>In the past 12 months, there were (58) number of persons hired who may have contact with confined persons who have had criminal background record checks. In the past 12 months, there were (4) number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with confined persons.</p> <p>Conclusion:</p> <p>The Auditor concluded the Richmond City Justice Center is performing appropriate practices to identify previous acts of sexual misconduct prior to hiring, enlisting services of contractors, volunteers and before promoting staff members. The Auditor conducted a thorough review of the facility’s policies and procedures, Background Investigation/Polygraph Personal History Questionnaire, criminal background records documentation, personnel, and contractor records, and interviewed staff and determined the facility meets the requirements of this standard.</p>
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115.18	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Facility Design • Camera Schedule • Modification Memo • Observations • Interviews with staff <p>The Richmond City Justice Center was built in July 2014. Since then, they have not acquired any new facility or planned any substantial expansion or modification of its existing facilities during this audit period. The facility has not installed or updated its video monitoring system, electronic surveillance system, or other monitoring technologies during this audit period. The Auditor conducted a thorough tour of the facility and observed camera placements throughout. Each area of the facility appeared to be original construction. All cameras throughout the facility appeared to have been in place for a significant time period.</p> <p>The agency made modifications of its facility by adding new cameras on pods 5C and 5G to enhance the agency's ability to protect inmates from sexual abuse. The Auditor determined the Richmond City Justice Center meets the requirements of this standard. The PREA Compliance Coordinator is aware of the requirement to consider sexual abuse and sexual harassment protections when planning for modifications.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Evidence Protocol/Medical Examinations - PREA 115.21 • Coordinated Response to a Sexual Assault Incident • Bon Secours Richmond Health System MOU • EmpowerNet Hotline MOU • Interview with Victim Advocate • Interview with Sexual Assault Nurse Examiner • Interview with Investigator <p>Auditor's Discussion:</p> <p>Policy - Evidence Protocol/Medical Examinations</p> <p>The Richmond City Justice Center conducts administrative and criminal investigations of allegations of sexual abuse and sexual harassment. The Richmond City Justice Center Sexual Abuse Investigator is responsible for collecting evidence within the facility. Facility staff is required to preserve the crime scene until the investigator arrives to process and collect the evidence.</p> <p>Bon Secours Richmond Health System will provide individuals in the custody of the Richmond City Sheriff's Office with access to outside victim advocates for emotional support related to sexual abuse and/or violence in order for the Richmond City Sheriff's Office to comply with the Prison Rape Elimination Act (PREA) requirements for jails and/or prisons.</p> <p>The EmpowerNet Hotline and the Richmond City Sheriff's Office have entered into an agreement in accordance to comply with the Prison Rape Elimination Act (PREA). This act requires that an individual in jail and/or prison that has experienced a sexual assault have an outside third party contacted to report complaints, and to receive initial support. This agreement will allow the EmpowerNet Hotline Advocates to serve as outside support for inmates (male or female) with confidential emotional support services as it relates to sexual abuse. (PREA Standard 115.51)</p> <p>Analysis/Reasoning:</p> <p>The Auditor conducted a formal interview with an advocate from The EmpowerNet Hotline. The advocate confirmed the Memorandum of Understanding with the RCJ. The Auditor asked the advocate if the organization will accompany a victim during the forensic examination. It was explained when contacted and requested by the victim an advocate will accompany the victim. The victim advocate explained the organization works with victims to provide crisis intervention, advocacy, counseling, and provides information to support victims. There were (0) number of forensic medical exams conducted during the past 12 months. There were (0) number of exams performed by SANES/SAFEs during the past 12 months. There were (0)</p>

	<p>number of exams performed by a qualified medical practitioner during the past 12 months.</p> <p>Conclusion:</p> <p>An appropriate uniform evidence protocol is utilized when collecting evidence of sexual abuse. The facility allows confined persons access to victim advocates from a community organization. The facility provides access to a Sexual Assault Nurse Examiner through the Bon Secours Richmond Health System. The Auditor reviewed the facility's policies and procedures, Memorandum of Understanding, and interviewed the investigator, SANE, and victim advocate and determined the facility meets the requirements of this standard.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Referrals of Allegations for Investigation - PREA 115.22 • Policy 118 Investigation SOP • PREA Assessment Spreadsheet 2025 • Website Information • Interview with Investigator • Interview with Confined Persons <p>Auditor's Discussion:</p> <p>Policy #118 Investigations</p> <p>The Richmond City Justice Center policy mandates an administrative or criminal investigation be completed for all allegations of sexual abuse and sexual harassment. The policy requires the investigation be conducted thorough and competent and where possible, will clearly either support or refute allegations, by evidence, information gathered from witnesses, and documentation; and to safeguard the well-being and security of the complainant, the subject, the respondent, the institution and the agency, and ensure the integrity and credibility of the process.</p> <p>Analysis/Reasoning:</p> <p>In the past 12 months, there were (12) number of allegations of sexual abuse and sexual harassment that were received. In the past 12 months, there were (4) number of allegations resulting in an administrative investigation. In the past 12 months, there (4) number of allegations referred for criminal investigation.</p> <p>Conclusion:</p> <p>The investigator informed the Auditor he contacts the sheriff's office to make referrals</p>

	when the evidence supports criminal prosecution. The investigator stated he investigates all allegations of sexual abuse and sexual harassment. The Auditor determined the facility meets the requirements of this standard after reviewing policy and procedures, facility website, investigative files and interviewing the facility investigator.
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115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Employee Training - PREA 115.31 • PREA Lesson Plan 10/2025 • Training Rosters • Interviews with staff <p>Auditor's Discussion:</p> <p>Policy- Employee Training</p> <p>I. TRAINING AND EDUCATION</p> <p>Policy:</p> <p>(a) The agency shall train all employees who may have contact with inmates on:</p> <ol style="list-style-type: none"> 1) Its zero-tolerance policy for sexual abuse and sexual harassment; 2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; 3) Inmates' right to be free from sexual abuse and sexual harassment; 4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; 5) The dynamics of sexual abuse and sexual harassment in confinement; 6) The common reactions of sexual abuse and sexual harassment victims; 7) How to detect and respond to signs of threatened and actual sexual abuse; 8) How to avoid inappropriate relationships with inmates; 9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and 10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. <p>(b) Such training shall be tailored to the gender of the inmates at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only</p>

female inmates, or vice versa.

(c) All current employees who have not received such training shall be trained within one year the effective date of the PREA standards, and the agency shall 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. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies.

(d) The agency shall document, through employee signature or electronic verification that employees understand the training they have received.

Procedure:

All employees who have contact with inmates will be trained on the departments zero tolerance policy for sexual abuse and sexual harassment.

Employees will receive training on the PREA standards, and the agency shall provide each employee with refresher training every two (2) years to ensure all employees know the agency's current sexual abuse and sexual harassment policies and procedures.

In between the years in which an employee does not receive refresher training, the agency will provide refresher information on current sexual abuse and sexual harassment policies.

Analysis/Reasoning:

The Auditor reviewed the facility's training curriculum utilized to train staff. The training material provided to employees includes all bulleted topics listed above. The Auditor verified through training attendance rosters all staff received the required training. New officers are provided the training during their initial orientation training prior to performing duties. Staff training is conducted electronically and in person during annual in-service training. The Auditor verified all staff has received training and completed a test of the material they received training on. Staff members are required to achieve a score of 100 percent after completing training.

The Auditor conducted informal and formal interviews with random and specialized facility staff. Supervisors informed the Auditor they discuss PREA related topics routinely during shift briefings. Subordinate staff confirmed the practice of discussing PREA related topics during shift briefings to the Auditor. The Auditor questioned staff about the training topics previously listed. All staff interviewed by the Auditor informed they received training and were able to articulate the topics to the Auditor. Staff interviewed by the Auditor was knowledgeable regarding the training material provided by the facility.

The Richmond City Justice Center is not required to provide additional training to staff before reassigning to another facility as the RCJC only operates one facility.

	<p>Conclusion:</p> <p>The Auditor concluded the facility has appropriately trained its staff and documented the training as required by this standard. Facility staff appear well educated in the training topics mandated in PREA Standard 115.31. The Auditor reviewed facility policies and procedures, training materials, training rosters, and conducted interviews with staff and determined the facility meets the requirements of this standard.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Volunteer and Contractor Training - PREA 115.32 • PREA Lesson Plan Training Curriculum and Acknowledgement • Training Roster • Interviews with Contractors <p>Auditor's Discussion:</p> <p>Policy-Volunteer and Contractor Training</p> <p>Policy</p> <p>(a) The agency shall ensure 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.</p> <p>(c) The agency shall maintain documentation confirming that volunteers and contractors understand the training they have _____ received.</p> <p>Procedure</p> <ol style="list-style-type: none"> 1. All volunteers and contractors, who have contact with inmates will be trained on their responsibilities under the Prison Rape _____ Elimination Act (PREA) policy. The type and level of training is based on the services they provide and the level of contact _____ they have with inmates. 2. All volunteers and contractors who have contact with inmates have, at the very least, been notified of the agency's zero _____ tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. 3. Documentation confirming that the volunteers/contractors understand the training they receive is kept on file within the _____ agency. <p>Analysis/Reasoning:</p> <p>The Richmond City Justice Center has a policy which requires the Training Manager to ensure all volunteers and contractors receive training regarding their responsibilities</p>

	<p>under the jail’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures. The Training Manager ensures the level and type of training provided to volunteers and contractors is based on the services provided and the level of contact they have with confined persons. The policy requires all volunteers and contractors who have contact with confined persons be notified of the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report allegations of such incidents. The Training Manager is required to maintain documentation confirming volunteers and contractors understand the training provided by the facility.</p> <p>All volunteers and contractors are informed how to report allegations of sexual abuse and sexual harassment. The Auditor observed the facility’s training curriculum which includes volunteer and contractor responsibilities towards the facility’s prevention, detection, and response efforts regarding sexual abuse and sexual harassment. Initial training is provided by a RCJC staff member in a classroom setting. The facility currently has (80) trained volunteers and contractors.</p> <p>The Auditor conducted formal interviews with food service and medical and mental health contract personnel. Each contractor interviewed verified they had received training and signed a Volunteer/Contractor Agreement. The Auditor questioned about specifics relating to the facility’s policy and procedures for reporting, documenting and their duties as a non-security first responder. Each contractor was able to articulate their responsibilities as a first responder and how to report and document allegations of sexual abuse and sexual harassment. Volunteers and Contractors are informed that violations of the facility’s sexual abuse policies will result in termination and notification to law enforcement officials for prosecution referral.</p> <p>Conclusion:</p> <p>The Auditor concluded the facility is appropriately training volunteers and contractors and staff ensures documentation of training is maintained. The Auditor determined through a review of facility policies and procedures, training curriculum, Acknowledgements, and interviewing contractors the Richmond City Justice Center meets the requirements of this standard.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Inmate Education - PREA 115.33 • Sexual Assault Awareness and Prevention Brochure • Break the Silence Memo English and Spanish • Purple Communications • PREA Training and Acknowledgement

- Confined Persons Handbook English and Spanish
- Confined Persons Records
- Interviews with Staff
- Interviews with Confined Persons
- Observations

Auditor's Discussion:

Policy-Inmate Education

(a) During the intake process, inmates shall receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

(b) Current inmates who have not received such education shall be educated within one year of the effective date of the PREA standards, and shall 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.

(c) The agency shall provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills.

Analysis/Reasoning:

The Auditor reviewed documentation provided by the facility which shows inmates had received information during the booking process and comprehensive education within 30 days of arriving at the facility. The Auditor interviewed staff members who work in the intake section. Staff informed the Auditor each inmate receives an informational sheet when arriving in intake. The booking officer discusses the PREA informational sheet with each inmate then receives the inmate's signature on the sheet. Booking Officers informed they play the PREA comprehensive educational video during the booking process.

There were (6455) number of inmates admitted during past 12 months who were given this information at intake. There were (5076) number of those inmates 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/harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake.

Conclusion:

The Auditor conducted interviews with inmates. Each inmate was asked questions related to the educational material provided by the facility. Each inmate was able to articulate answers to the Auditor's questions which reveal they had received PREA information and education. All inmates knew how to report allegations of sexual assault, sexual harassment and/or retaliation for reporting such incidents. The inmate population was fully aware of the facility's zero tolerance policy towards sexual abuse and sexual harassment. Inmates had been made aware of their right to be free from

	<p>sexual abuse, sexual harassment and retaliation, and the facility's policies for responding to such incidents.</p> <p>The Auditor determined the facility meets the requirements of this standard.</p>
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115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Investigations - PREA 115.34 • NIC Website Course • Investigator's Training Certificates • Interview with Investigators <p>Auditor's Discussion:</p> <p>Policy - Investigations</p> <p>(a) In addition to the general training provided to all employees pursuant to § 115.31, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such in confinement settings.</p> <p>b) The agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.</p> <p>Procedure</p> <ol style="list-style-type: none"> 1. Investigators who investigate allegations of sexual abuse are trained in conducting sexual abuse investigations in confinement settings. 2. The agency maintains documentation showing that investigators have completed the required training. <p>Analysis/Reasoning:</p> <p>At the time of the audit the facility employed (3) staff members who have received specialized training to conduct Sexual Abuse Investigations. The Auditor conducted a review of each investigator's training record. The investigators attended a training class sponsored by NIC. The training was titled, "PREA: Investigating Sexual Abuse in a Confinement Setting." The Auditor reviewed the NIC training curriculum utilized to train the Sexual Abuse Investigators. The training curriculum included the following:</p> <ul style="list-style-type: none"> • Techniques for interviewing sexual abuse victims; • Proper use of Miranda warnings; • Proper use of Garrity warnings; • Sexual abuse evidence collection in confinement settings; and

	<ul style="list-style-type: none"> Criteria and evidence required to substantiate a case for administrative action or prosecution referral. <p>The Auditor verified both investigators also received the training offered to all employees. One investigator was formally interviewed by the Auditor. The Auditor asked the investigator to discuss the training he received. The Investigator articulated the topics listed above in his response. The Investigator was knowledgeable regarding conducting sexual abuse investigations. The Auditor asked the Investigator to explain his investigative process after receiving an allegation. The process utilized by the Investigator is sufficient for conducting appropriate sexual abuse and sexual harassment investigations.</p> <p>Conclusion:</p> <p>The Auditor concluded the facility has provided appropriate training to its Sexual Abuse Investigators. The Auditor conducted a review of policies and procedures, training curriculum, training records, and conducted an interview with a Sexual Abuse Investigator and determined the facility meets the requirements of this standard.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> Policy – Medical and Mental Health Care – PREA 115.35 PREA Lesson Plan Training Curriculum 10/2025 Interviews with Medical and Mental Health Staff Medical Personnel Training Records <p>Auditor’s Discussion:</p> <p>Specialized Training: Medical and Mental Health Care</p> <p>Policy:</p> <p>(a) The agency shall ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in:</p> <ol 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; and How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. <p>Procedure:</p>

	<p>2. All full and part-time medical and mental health practitioners who work regularly in the facility have been trained in:</p> <ul style="list-style-type: none"> i. How to detect and assess signs of sexual abuse and sexual harassment. ii. How to preserve physical evidence of sexual abuse. iii. How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and iv. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. <p>Analysis/Reasoning:</p> <p>RCJC ensures that all full and part-time medical and mental health care practitioners who work regularly have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>There were (64) number of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy and (100) percent of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy.</p> <p>Conclusion:</p> <p>RCJC maintains documentation that medical and mental health practitioners have received the training. Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers. The Auditor conducted a review of RCJC policies and procedures, training curriculum, training records, and interviewed medical and mental health professionals and determined the agency meets the requirements of this standard.</p>
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Screening - PREA 115.41 • Screening for Risk of Sexual Victimization and for Abusiveness Forms • PREA Initial Classification Assessment • Interviews with Staff • Interviews with Confined Persons

Auditor's Discussion:

Screening for Risk of Sexual Victimization and Abusiveness

Policy

(a) All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.

(b) Intake screening shall ordinarily take place within 72 hours of arrival at the facility.

(c) Such assessments shall be conducted using an objective screening instrument.

(d) The intake screening shall 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;
- 2) The age of the inmate;
- 3) The physical build of the inmate;
- 4) Whether the inmate has previously been incarcerated;
- 5) Whether the inmate's criminal history is exclusively nonviolent;
- 6) Whether the inmate has prior convictions for sex offenses against an adult or child;
- 7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- 8) Whether the inmate has previously experienced sexual victimization;
- 9) The inmate's own perception of vulnerability; and
- 10) Whether the inmate is detained solely for civil immigration purposes.

(e) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive.

(f) Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

(g) An inmate's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

(h) Inmates may not be 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.

(i) The agency shall implement 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.

Procedure

1. All inmates will be screened during Intake using an Objective Classification Screening instrument. Newly committed inmates will be screened for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.
2. Intake screening will take place within seventy-two (72) hours of arrival at the facility.
3. Classification will reassess the inmate no later than thirty (30) days from the inmate's arrival to the facility. The inmate's risk of victimization or abusiveness will be based upon any additional relevant information received by the facility since the Intake screening.
4. Intake Screening will consider at a minimum the following to assess inmates for risk of sexual victimization:
 - i. Whether the inmate has a mental, physical or developmental disability.
 - ii. Age of the inmate.
 - iii. Physical build of the inmate.
 - iv. If the inmate has previously been incarcerated.
 - v. If the inmates criminal history is exclusively nonviolent.
 - vi. If the inmate has prior convictions for sex offenses against an adult or child.
 - vii. If the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming.
 - viii. If the inmate has previously experienced sexual victimization.
 - ix. The residents/inmate own perception of vulnerability.
 - x. If the inmate is detained solely for civil immigration.
 - xi. If the inmate has any prior acts of sexual abuse.
 - xii. If the inmate has prior convictions for violent offenses.
 - xiii. If the inmate has a history of prior institutional violence or sexual abuse, as known to the agency.
5. Based on the answers provided and the inmates own perceptions of vulnerability a determination for the residents/inmate housing is made during Intake. If the inmate feels comfortable in general population, the inmate will be placed in a housing unit. If the inmate feels uncomfortable being placed in general population, the inmate will be housed in Administrative Segregation until seen and evaluated by the PREA Coordinator and/or Classification; unless required by a medical practitioner to be housed in Medical.
6. The inmates risk level will be reassessed at any time and when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmates risk of sexual victimization or abusiveness.
7. Inmates will not be disciplined for refusing to answer, or for not disclosing complete information in response to questions asked during the risk screening relating to the following questions:
 - i. Whether the inmate has a mental, physical, or developmental disability.
 - ii. Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming.
 - iii. Whether the inmate has previously experienced sexual victimization.
 - iv. The inmates own perception of vulnerability.

8. Appropriate controls on the dissemination of information shall be implemented within the facility of responses to questions asked pursuant to the inmate screening, in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates.

Analysis/Reasoning:

The Auditor reviewed the Classification PREA Questionnaire utilized during the intake screening. The intake screening occurs in an office in a private setting away from other inmates. All questions are asked by the Classification Officer. The Classification PREA Questionnaire includes the following considerations:

- Current charges
- Previous arrests
- Escape history
- Disciplinary history
- Prior felony convictions
- Alcohol and drug history
- Employment
- Age
- Outstanding warrants or detainers
- Religious preference
- Enemies
- Gang affiliation
- Mental or physical disabilities
- Officer observations - developmental disability, cognitive impairments, stature, young
- Incarceration history
- Victimization while incarcerated
- Homosexual activity
- Criminal history consisting of non-violent offenses
- Criminal history consisting of violent offenses
- Criminal history consisting of violent and non-violent offenses
- Prior convictions or acts of sex offenses against a child
- Prior convictions of acts of sex offenses against an adult
- Sexual orientation preference
- Gender alterations
- Ever victimized by sexual abuse
- Perceptions of sexual victimization
- Prior acts of sexual abuse
- Prior convictions of violent offenses
- Questions related to PREA information provided

There were (3456) number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility.

	<p>There were (5076) number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 30 days or more) who were supposed to be reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake.</p> <p>!2 of the 30 inmates who were interviewed said they were not called back for a security risk reassessment. One of the twelve inmate record review files indicated that a risk screening reassessment did not take place. The auditor requested the facility to forward to him risk screening documentation within 72 hours of arrival, and a reassessment within 30 days of arrival to the facility. On March 25, 2026, I received documentation of 187 inmates who were assessed within 72 hours and reassessed with 30 days after their arrival to the Richmond City Justice Center.</p> <p>Conclusion:</p> <p>The Auditor determined the facility is appropriately screening inmates for their risk of victimization and abusiveness. The Auditor determined the facility meets the requirements of this standard.</p>
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Use of Screening Information - PREA 115.42 • Risk Screenings • Classification Records • Interviews with Confined Persons • Interviews with Staff • Observations <p>Auditor's Discussion:</p> <p>Policy-Use of Screening Information</p> <p>(a) The agency shall use information from the risk screening required by § 115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>(b) The agency shall make individualized determinations about how to ensure the safety of each inmate.</p> <p>(c) In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming</p>

assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.

(d) Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.

(e) A transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration.

(f) Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.

(g) The agency shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such 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 such inmates.

Procedure:

1. Information from the risk screening will be used to determine housing, bed, work, education, and program assignments to prevent inmates with the high risk of being sexually victimized from those at the risk of begin sexually abusive.

2. The agency makes individualized determinations about how to ensure the safety of each inmate.

3. The agency makes housing and program assignments for transgender or intersex inmates in the facility on a case by case basis to ensure the inmates health and safety; and whether the placement would present management or security problems.

4. Placement and programming assignments for transgender or intersex inmates will be reassessed at least twice each year to review any threats to the inmate's safety.

5. A transgender or intersex inmates own views with respect to his/her own safety shall be given serious consideration.

6. Transgender or intersex inmates shall be given the opportunity to shower separately from other inmates.

7. The PREA Coordinator or designee will assess all transgender or intersex inmates for housing to include:

i. Does the inmate feel comfortable being housed in general population?

ii. What gender of inmates does the inmate feel comfortable being housed with?

iii. Does the inmate feel comfortable showering around other inmates?

iv. Does the inmate prefer to shower away from other inmates?

v. Transgender or intersex inmates who prefer to shower separately will be taken to Transfer & Release or an occupied dayroom and allowed to shower.

vi. Transgender or intersex inmates in general population can submit a request form to the PREA Coordinator or Classification to request a change in housing or showering status.

vii. Lesbian, gay, bisexual, transgender or intersex inmates shall not be placed in dedicated facilities, units or wings solely on the basis of such identification or status, unless such 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 such inmate.

Analysis/Reasoning:

The Richmond City Justice Center policy mandates classification staff use information obtained during the risk screening as required by 115.41 to assist in determining housing, bed, work, education, and programming assignments to prevent confined persons who are determined at high risk of sexual victimization from being placed with those at risk of being sexually abusive. Policy stipulates classification staff make individualized determinations to ensure the safety of each confined person.

The facility's classification staff is required to consider on a case-by-case basis whether placements in housing, bed, work, education, or programs would present a management or security problem when assigning a transgender or intersex confined person to a living unit or a program. The classification supervisor is responsible for ensuring the health and safety of a transgender or intersex confined person when making housing, bed, work, education, and program assignments. Policy requires the transgender or intersex confined person's own views with respect to his/her own safety be given serious consideration.

Any housing and program assignments for transgender and intersex confined persons are reassessed twice each year by classification staff in an attempt to identify any threats to safety experienced by the transgender or intersex confined person. Policy requires transgender and intersex confined persons be given the opportunity to shower separately from other confined persons.

The agency's policy stipulates lesbian, gay, bisexual, transgender, or intersex confined persons will not be placed in a dedicated facility, unit, or wing solely on the basis of such identification or status, unless the placement is established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such confined persons.

The Auditor observed all facility living units during a detailed facility tour. All living units have shower areas which allow transgender and intersex confined persons the opportunity to shower separately from other confined persons. Each shower has a curtain and toilet areas in the facility are protected with a wall.

Conclusion:

The Auditor concluded classification staff is making individualized determinations when assigning transgender and intersex confined person's housing, bed, work, programming and education assignments. The facility has appropriate policies, procedures and practices in place to protect those identified at high risk of victimization from those identified at high risk of sexual abusiveness. The Auditor conducted a thorough review of policies and procedures, classification records, risk screenings, made observations, and interviewed staff and confined persons and determined the facility meets the requirements of this standard.

115.43	Protective Custody
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <hr/> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Protective Custody - PREA 115.43 • PREA Initial Classification Assessment • Institutional Classification Committee (ICC) Review • Interviews with Staff • Interview with Confined Persons • Observations <p>Auditor's Discussion:</p> <p>Policy - Protective Custody</p> <p>(a) Inmates at high risk for sexual victimization shall not be placed 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. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.</p> <p>(b) Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:</p> <ol style="list-style-type: none"> 1) The opportunities that have been limited; 2) The duration of the limitation; and 3) The reasons for such limitations. <p>(c) The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.</p> <p>(d) If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the facility shall clearly document:</p> <ol style="list-style-type: none"> 1) The basis for the facility's concern for the inmate's safety; and 2) The reason why no alternative means of separation can be arranged. <p>(e) Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.</p> <p>Procedure:</p> <ol style="list-style-type: none"> 1. Inmates at high risk for sexual victimization will not be placed 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.

2. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:

- i. The opportunities that have been limited.
- ii. The duration of the limitation.
- iii. The reasons for such limitations.

3. The facility shall assign inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged. Such an assignment shall not exceed a period of thirty (30) days.

4. If an involuntary segregated housing assignment is made, the facility shall clearly document:

- i. The basis for the facility's concern for the inmate's safety.
- ii. The reason why no alternative means of separation can be arranged.

5. An incident report will be completed on all inmates placed in involuntary segregated housing.

i. The PREA Coordinator and Classification will review all incident reports and determine if the need for continued segregated housing is required.

ii. If the inmate is to remain in involuntary segregated housing, Classification will complete an incident report documenting the reason the inmate will remain in segregated housing, any limitations to programs, education, and work opportunities, the duration of the limitations and why the limitations are placed based on the safety of the inmate and security of the facility.

iii. Classification will also document this information in the inmates Classification file.

6. Inmates in involuntary segregated will be reviewed at least every thirty (30) days by the PREA Coordinator and Classification to determine whether there is a continuing need for separation from the general population.

Analysis/Reasoning:

The facility reported there was no confined persons identified at high risk of sexual victimization in the previous 12 months. The Auditor reviewed housing records and did not discover evidence a confined persons had been identified at high risk of sexual victimization.

The Auditor conducted formal interviews with classification staff. Classification staff informed the Auditor there was no confined persons identified at high risk of sexual victimization. The Auditor asked classification to explain the process when placing a high risk confined persons involuntarily in segregation. Classification informed the

Auditor if they place a confined person involuntarily in segregation an immediate assessment is conducted to view available alternatives. The Auditor was informed there are multiple male and female living units which could be utilized without having to place the confined persons involuntarily in segregation. Classification staff was aware that confined persons identified at risk of sexual victimization have access to programs, privileges, education, and work opportunities. Classification staff was asked how often a review to determine a continued need of involuntary segregation is conducted. The Auditor was informed a review is conducted every 30 days.

The Auditor reviewed housing and classification records and discovered no confined persons identified at high risk of sexual victimization was placed in involuntary segregation. The Auditor interviewed medical and mental health personnel. Medical and mental health staff was unaware of a confined persons who had been identified at high risk of sexual victimization.

The Auditor interviewed several security personnel who supervise confined persons in the segregation housing unit. Staff was asked if confined persons in segregated housing receive access to programs, privileges, education, and work opportunities. Staff informed confined persons have access to programs, education and work opportunities upon request, dependent upon legitimate facility security concerns. Privileges are provided to all confined persons in the segregation housing unit. The Auditor asked if staff have ever supervised a confined persons in segregation housing who was identified at high risk of sexual victimization and was informed "no."

The Auditor conducted a detailed tour of the facility. Observations were made of each confined persons living unit. The Auditor observed multiple areas which can house male or female confined persons to ensure those identified at risk of sexual abuse are protected from sexual abusers.

Conclusion:

Although the Auditor discovered no evidence a confined persons had been identified at risk of sexual victimization who was placed involuntarily in segregation the facility has policies and procedures in place to ensure appropriate placement and reviews are conducted. The Auditor made observations, conducted a review of policies, procedures, classification records, housing records, and interviewed staff and confined persons and determined the facility meets the requirements of this standard.

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Policy, Materials, Interviews and Other Evidence Reviewed

- Policy - Inmate Reporting - PREA 115.51
- Break the Silence Memo English and Spanish
- Confined Persons Handbook-Insert English and Spanish
- RCSO PREA Refresher: Ways Confined Persons Can Report Memo
- Resident Request Form
- EmpowerNet Hotline Memorandum of Understanding
- PREA Third Party Reporting Poster English and Spanish
- PREA Reports
- PREA Staff Brochure
- Interviews with Staff
- Interviews with Confined Persons

Auditor's Discussion:

Policy - Inmate Reporting

(a) The agency shall provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

(b) The agency shall also provide at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Inmates detained solely for civil immigration purposes shall be provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security.

(c) Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports.

(d) The agency shall provide a method for staff to privately report sexual abuse and sexual harassment of inmates.

Procedure

1. The Richmond City Sheriff's Office allows for internal reporting, by inmates, to report privately to agency officials about:
 - i. Sexual abuse or sexual harassment.
 - ii. Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; and
 - iii. Staff neglect or violation of responsibilities that may have contributed to such incidents.
2. The multiple internal reporting methods an inmate can utilize are:
 - i. Verbal Reporting.
 - ii. Inmate Request form
 - iii. Grievance Forms

3. The agency provides at least one way for an inmate to report abuse or harassment to a public or private entity or office that is not part of the agency by contacting the Greater Richmond Regional EmpowerNet Hotline at 804-612-6126. The Hotline staff are available 24 hours a day.
4. Inmates detained solely for civil immigration purposes must be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security.
5. Staff must accept reports of sexual assault and sexual harassment made verbally, in writing, anonymously, and from third parties.
6. Staff is required to immediately document verbal reports.
7. Staff can privately report sexual abuse and sexual harassment of inmates to their supervisor or any other facility supervisor.
8. Staff is informed of these procedures in the following ways:
 - i. Classroom training.
 - ii. Muster briefings.
 - iii. Email bulletins.
 - iv. Policies.

Analysis/Reasoning:

The Richmond City Sheriff’s Office offers multiple ways to report sexual abuse and sexual harassment. Reports can be made anonymously:

- Call the Greater Richmond Regional at (804) 612-6126.
- Dayroom Phones Press 1 for English and 2 for Spanish. Then dial #89 OR *89
- Report to any staff, volunteer, contractor, medical or mental health staff.
- Submit a request form, grievance or sick call slip.
- Report to the PREA Coordinator or PREA Compliance Manager/Investigator.
- Tell a family member, friend, legal counsel or anyone else outside the facility they are able to report on your behalf by calling (804) 612-6126.
- You can submit a report on someone’s behalf or someone at the facility can report on your behalf using the ways listed here.

Third-Party Reporting

- Inmates can also ask someone else to report for them, like a family member, friend, attorney, outside advocate, or another inmate.
- This person, known as a third-party reporter, can report on an inmate’s behalf using any of the methods above or by:
 - Calling the agency directly
 - Contacting the PREA Coordinator (information on the agency website)

Reporting from Segregation

- Inmates housed in isolation can report to staff or in writing, including through emergency grievances or by calling [804-612-6126] when they have phone

	<p>privileges or have received staff permission to use the phone. Staff should respect inmate privacy in such situations.</p> <ul style="list-style-type: none"> Inmates can also ask for the PREA Coordinator to come speak with them. <p>Richmond City Sheriff's Office has partnered with (YWCA of Richmond) to provide survivors of sexual abuse with Emotional Support Services. To access these services, contact (804) 643-6761 or send a letter to 6 N 5th Street Richmond, Virginia 23219. The EmpowerNet Hotline and the Richmond City Sheriff's Office have entered into an agreement in accordance to comply with the Prison Rape Elimination Act (PREA). This act requires that an individual in jail and/or prison that has experienced a sexual assault have an outside third party contacted to report complaints, and to receive initial support, This agreement will allow the EmpowerNet Hotline Advocates to serve as outside support for confined persons (male or female) with confidential emotional support services as it relates to sexual abuse.</p> <p>Conclusion:</p> <p>The Auditor conducted a thorough review of the facility's policy and procedures, conducted interviews with staff and inmates and determined that the facility meets the requirements of this standard.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> Policy - Exhaustion of Administrative Remedies - PREA 115.52 Memo: Regarding Submission of Grievances (11-14-2025) Interviews with Staff Interviews with Confined Persons <p>Auditor's Discussion:</p> <p>Policy - Exhaustion of Administrative Remedies</p> <p>(a) An agency shall be exempt from this standard if it does not have administrative procedures to address inmate grievances regarding sexual abuse.</p> <p>(b) 1) The agency shall not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.</p> <p style="padding-left: 40px;">2) The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.</p> <p style="padding-left: 40px;">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.</p> <p style="padding-left: 40px;">4) Nothing in this section shall restrict the agency's ability to defend against</p>

an inmate lawsuit on the ground that the applicable statute of limitations has expired.

(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.

(d) 1) The agency shall 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.

2) Computation of the 90-day time period shall 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.

(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 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.

3) If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision.

(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 shall document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

(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.

Procedure

1. The agency has an administrative procedure for dealing with inmate grievances regarding sexual abuse.

2. Agency policy allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred.

3. Inmates are not required to use an informal grievance process, or otherwise to attempt to resolve with staff, an alleged incident of sexual abuse.

4. Residents/Inmate may submit a grievance alleging sexual abuse without submitting the grievance to the staff member who is the subject of the complaint.

5. Any inmate grievance alleging sexual abuse shall not be referred to the staff member who is the subject of the complaint.

6. A final decision will be issued by Internal Affairs on the merits of any portion of a grievance alleging sexual abuse within ninety (90) days of the initial filing of the grievance.

7. Internal Affairs may claim an extension of time to respond up to seventy (70) days, if the normal time period for response is insufficient to make an appropriate decision.

8. If an extension is needed the inmate will be notified in writing. The notification will also include a date by which a decision will be made.

9. Policy and procedure permits third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such request on behalf of residents/inmate.

10. If the inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the inmate's decision to decline.

11. The agency has a policy and established procedure for filing an emergency grievance alleging that an inmate is subject to substantial risk of imminent sexual abuse. (Follow procedures outline in staff and agency reporting duties)

12. Emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within forty-eight (48) hours.

13. Emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within five (5) days.

14. After an agency decision is made, a copy of the emergency grievance and all responses shall be forwarded to the PREA Coordinator.

The agency shall only 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.

Analysis/Reasoning:

The Richmond City Justice Center is not exempt from this standard as it maintains procedures to address confined persons grievances alleging sexual abuse. Facility policy does not impose a time limit on any portion of a grievance alleging sexual abuse and does not impose a time limit when a confined persons may file a grievance alleging sexual abuse. When submitting a grievance alleging sexual abuse a confined persons is not required by the facility to exhaust informal means such as mediations or participate in any process which requires interaction with the perpetrator. RCJC policy stipulates nothing in the policy shall restrict the facility's ability to defend against a lawsuit on the grounds that the applicable statute of limitations has expired.

Any confined persons wishing to submit a grievance alleging sexual abuse against a staff member will may do so without submitting it to a staff member who is the subject of the complaint. Facility policy prohibits such grievances from being referred to a staff member who is the subject of the complaint.

In the past 12 months, there were (0) number of grievances filed that alleged sexual abuse: (0) number of grievances alleging sexual abuse that reached final decision within 90 days after being filed: (0) number of grievances alleging sexual abuse that involved extensions because final decision was not reached within 90 days and (0) number of grievances alleging sexual abuse filed by confined persons in the past 12 months in which the confined persons declined third-party assistance, containing documentation of the confined person's decision to decline and 0 number of emergency grievances.

The Auditor conducted formal interviews with random and specialized staff. Staff was asked if the facility allows confined persons the opportunity to submit grievances alleging a risk of imminent sexual abuse. The Auditor was informed confined persons can submit such grievances. Facility staff understood the procedures for submitting emergency grievances alleging a risk of imminent sexual abuse. Supervisors interviewed by the Auditor were aware of the time limits in response to an emergency grievance alleging an imminent risk of sexual abuse. A review of grievance records reveals no confined person submitted a grievance alleging an imminent risk of sexual abuse.

	<p>Conclusion:</p> <p>Although there were no emergency grievances submitted during this audit period for the Auditor to review, the Auditor determined the facility has appropriate procedures in place for processing such grievances. Facility staff understands those procedures and the confined person population is aware they can submit grievances alleging a risk of imminent sexual abuse. The Auditor reviewed the facility’s policies and procedures and conducted interviews with staff and confined persons and determined the facility meets the requirements of this standard.</p>
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115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Confidential Support Services - PREA 115.53 • PREA Sexual Assault Awareness and Prevention Brochure • MOU EmpowerNet Hotline • MOU RSO and VCU • Interview with Staff • Interview with Confined Persons <p>Auditor’s Discussion:</p> <p>Policy - Inmate Access to Outside Confidential Support Services</p> <p>(a) The facility shall 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, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.</p> <p>(b) The facility shall 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.</p> <p>(c) The agency shall 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. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.</p> <p>Procedure</p>

1. Inmates are provided with access to outside victim advocates for emotional support services related to sexual abuse by:
 - i. Giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available, for local, state, or national victim advocacy or rape crisis organizations.)
 - ii. Giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes.
 - iii. Enabling reasonable communication between inmates and these organizations in as confidential a manner as possible.
2. The facility informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored.
3. The facility informs inmates, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant federal, state, or local law.
4. The agency shall maintain or attempt to enter into memoranda of understanding (MOU) or other agreements with community service providers.
5. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.

Analysis/Reasoning:

The RCJC has a policy to provide confined persons with mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, state, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil or immigration purposes, immigrant services agencies. The policy requires reasonable communications between confined persons and those organizations and agencies, in as confidential manner as possible.

The Richmond City Justice Center informs confined persons of the extent to which communications to those organizations and agencies will be monitored prior to giving them access. The policy requires confined persons at the RCJC be provided with the extent to which reports of sexual abuse will be forwarded to authorities in accordance with mandatory reporting laws.

Agency policy requires the facility to maintain Memoranda of Understanding or other agreements with community service providers who are able to provide confined persons with confidential emotional support services related to sexual abuse to confined persons victims of sexual abuse. Policy requires the RSO to maintain copies of those agreements or other documentation showing an attempt to enter into such agreements.

	<p>This auditor tested the Empower Net Emotional Support Services Hot Line in one of the housing unit. I discovered that the resident needed to use his pin number to access the site. This was a violation of standard 115.53 because it was not a confidential phone call. The Richmond City Justice Center Staff took immediate steps to correct this problem. Within 24 hours, the inmate pin number was no longer a requirement to access this site. On February 20, 2026, I received received a new, revised PREA Brochure instructing residents to dial *8 to contact the Hot Line. This auditor tested the new number and it worked.</p> <p>Conclusion:</p> <p>The Auditor concurs that the Richmond City Justice Center is compliance with this standard after the above stated changes were made.</p>
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115.54	Third-party reporting
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Third-Party Reporting - PREA 115.54 • PREA Third Party Reporting Poster English and Spanish • Facility Website • Interviews with Staff • Interviews with Confined Persons <p>Auditor’s Discussion:</p> <p>It is the policy of the Richmond City Justice Center to accept third-party reports of sexual abuse and sexual harassment. The agencies Third-Party Reporting policy allows third-party reports of sexual abuse and sexual harassment be made by the following:</p> <ul style="list-style-type: none"> • Calling or writing Internal Affairs; • Selecting the “Report Sexual Abuse” link on the agency’s website; or • Speaking directly with any employee. <p>Analysis/Reasoning:</p> <p>The Auditor reviewed the Richmond City Justice Center website. The website informs the public how to make a report of sexual abuse or sexual harassment. The public is informed they can make a report by informing a staff member, contacting the PREA Coordinator, calling Victim Witness, or completing the Complaint Form and mailing it to the facility. The address is provided and the telephone number to Victim Witness is</p>

provided. Complaint Forms are mailed to the Richmond City Justice Center Sheriff's Office. Complaint Forms may also be emailed to the facility and an email address is provided. The website also provides the telephone number for the Internal Affairs department for reporting sexual abuse and sexual harassment.

RCJC staff is required to accept all reports of sexual abuse and sexual harassment, including verbally, in writing, anonymously and by third-party. The Auditor conducted formal interviews with staff and asked if they were required to accept third-party reports of sexual abuse or sexual harassment. Each staff member informed the Auditor they are required to accept all allegations of sexual abuse and sexual harassment. Staff informed the Auditor they accept the report, immediately inform a supervisor, and promptly document the allegation.

The Auditor conducted formal interviews with confined persons. Each confined person was asked what avenues were available for confined persons to make an allegation of sexual abuse or sexual harassment. During interviews confined persons informed the Auditor they could report it to a staff member, submit it in writing, or inform someone from the public to make an allegation for them. Confined persons were aware they could make a report anonymously. All confined persons interviewed were aware of the toll free PREA Hotline available to confined persons. All confined persons interviewed understood how to make a third-party allegation of sexual abuse or sexual harassment and most stated they would make such an allegation through the PREA Hotline.

Conclusion:

The Auditor found the facility accepts all reports, including third-party reports, of sexual abuse and sexual harassment. The public is informed through the facility's website how to make third-party reports on behalf of confined persons. The Auditor reviewed the facility's policies and procedures, website, and conducted interviews with staff and confined persons and determined the facility meets the requirements of this standard.

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Staff and Agency Reporting Duties - PREA 115.61 • RSO Coordinated Response to a Sexual Assault Incident • Staff Reports • Interviews with Medical Professionals • Interview with Mental Health Professional • Interviews with Staff

Auditor's Discussion:

Policy - Staff and Agency Reporting Duties

(a) The agency shall 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; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

(b) Apart from reporting to designated supervisors or officials, staff shall not reveal 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.

(c) Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.

(d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable person's statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

(e) The facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators.

Procedure:

1. All staff are required to report immediately any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, even if that facility is not with the Richmond City Sheriff's Office.
2. All staff are required to immediately report any retaliation against inmates or staff who report such incidents.
3. All staff are required to immediately report any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.
4. Apart from reporting to the designated supervisors or officials and designated state or local services agencies, staff is prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decision.

5. Unless otherwise precluded by Federal, State or local law, medical and mental health practitioners shall be required to report sexual abuse to those appropriate officials and to inform inmates of their duty to reports; and the limitations of confidentiality at the initiation of services.

6. If the alleged victim is under the age of eighteen (18) or considered a vulnerable adult under a State or local vulnerable person's statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

7. The facility shall report all allegations of sexual abuse and sexual harassment, including third party and anonymous reports, to the facility's designated investigators.

Analysis/Reasoning:

All staff at the Richmond City Justice Center are required to immediately report, and according to policy, any and all knowledge, suspicion, or information related to the following:

- An incident of sexual abuse or sexual harassment, whether or not it is part of the RCJC;
- Retaliation against confined persons or staff who reported such an incident;
- Any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

The Auditor interviewed randomly selected staff members. Each was asked if they are required to report any knowledge, suspicion or information related to sexual abuse, sexual harassment, retaliation, staff neglect or violation of duties. Each staff member informed the Auditor they are required to immediately report. When asked who they share the information with staff informed they report to their supervisor and are not allowed to discuss the incident details with anyone other than investigators, classification, and medical staff.

The Auditor interviewed medical and mental health practitioners. Each was asked if they report sexual abuse to anyone. The contract personnel stated they inform a security supervisor when a confined person reports suffering sexual abuse in a confinement facility.

The Auditor discussed informed consent, limitations of confidentiality, and duty to report with medical and mental health practitioners. Medical and mental health practitioners are aware of the requirement to inform inmates of their limits of confidentiality and their duty to report at the initiation of services. The Medical Department intake form contains a general consent for treatment and services.

Conclusion:

The Auditor conducted a thorough review of the facility's policy and procedures, conducted interviews with staff and confined persons and determined that the facility meets the requirements of this standard.

115.62	Agency protection duties
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 297">Auditor Discussion</p> <hr/> <p data-bbox="256 340 1193 374">Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul data-bbox="256 383 994 539" style="list-style-type: none"> • Policy - Agency Protection Duties - PREA 115.62 • Confined Persons Report • Interviews with Staff • Interviews with Confined Persons <p data-bbox="256 577 596 611">Auditor's Discussion:</p> <p data-bbox="256 649 793 683">Policy - Agency Protection Duties</p> <p data-bbox="256 721 1485 799">1. When an agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.</p> <p data-bbox="256 837 424 871">Procedure</p> <p data-bbox="256 909 1457 1021">1. When the agency or facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, immediate action will be taken to protect the inmate.</p> <p data-bbox="256 1059 579 1093">Analysis/Reasoning:</p> <p data-bbox="256 1131 1430 1332">The Auditor conducted interviews with security supervisors and classification staff. Security supervisors informed the Auditor they ensure an inmate who is at risk of imminent sexual abuse is removed from his/her current housing to maintain the inmate's safety. Supervisor's immediately report the information to the facility's sexual abuse investigator.</p> <p data-bbox="256 1370 1481 1572">The Auditor asked randomly selected security and non-security staff members what actions they take when they learn an inmate is at risk of imminent sexual abuse. Each security staff member informed they would separate the inmate and immediately inform their supervisor. Non-security staff members informed the Auditor they would immediately inform the Shift Commander.</p> <p data-bbox="256 1610 1383 1727">In the past 12 months, there were (0) number of times the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse.</p> <p data-bbox="256 1765 443 1798">Conclusion:</p> <p data-bbox="256 1836 1442 1953">The Auditor conducted a thorough review of the facility's policy and procedures, conducted interviews with staff and inmates and determined that the facility meets the requirements of this standard.</p>

115.63	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy – Reporting to Other Confinement Facilities – PREA 115.63 • Interviews with Staff <p>Auditor’s Discussion:</p> <p>Policy - Reporting To Other Confinement Facilities</p> <p>(a) Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.</p> <p>(b) Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p>(c) The agency shall document that it has provided such notification.</p> <p>(d) The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards</p> <p>Procedure:</p> <ol style="list-style-type: none"> 1. Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Sheriff or designee must notify the head of the facility or appropriate office of the agency/facility where sexual abuse is alleged to have occurred. 2. The Sheriff or designee will provide such notification as soon as possible but no later than seventy-two (72) hours after receiving the allegation. 3. The facility will fully document that I provided such notification within seventy-two (72) hours of receiving the allegation. 4. The Richmond City Sheriff’s Office is required to fully investigate allegations received from other facilities/agencies and in full accordance with these standards. <p>Analysis/Reasoning:</p> <p>The Richmond City Justice Center reported receiving (1) notification from another facility that one of Richmond City Justice Center’s former inmates alleged being sexually abused while confined at another facility in the past 12 months. In the past 12 months, there were (1) number of allegations of sexual abuse the facility received from other facilities.</p>

	<p>The Auditor conducted an interview with the Richard City Jail Sheriff. The Sheriff is aware of his requirement to report allegations of sexual abuse to other confinement facilities within 72 hours after receiving the allegation. The Richmond City Sheriff's Office is required to fully investigate allegations received from other facilities/agencies and in full accordance with these standards.</p> <p>The Auditor conducted formal interviews with facility staff and contract personnel. Each person interviewed stated they are required to immediately report and document any and all knowledge, suspicion and information regarding sexual abuse and sexual harassment. The Auditor asked each how quickly they are required to report and was informed "immediately."</p> <p>Conclusion:</p> <p>The Sheriff's Office fully understand the requirement to report allegations to other confinement facilities and to ensure allegations received are investigated. Staff members at the Richmond City Justice Center understand the department's requirement to immediately report allegations of sexual abuse and sexual harassment so allegations can be investigated. The Auditor reviewed the facility's policies and procedures and interviewed staff and determined the facility meets the requirements of this standard.</p>
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115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Staff First Responder Duties - PREA 115.64 • PREA Cards -Zero Tolerance • RCSO Coordinator Response to a Sexual Assault Incident • Interviews with Security First Responders • Interviews with Non-Security First Responders <p>Auditor's Discussion:</p> <p>Policy - Staff First Responder Duties</p> <p>(a) Upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to:</p> <ol style="list-style-type: none"> 1) Separate the alleged victim and abuser; 2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;

3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and

4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

(b) If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

Procedure:

1. Upon learning of an allegation that an inmate was sexually abused the first responder will:

- i. Separate the alleged victim and abuser.
- ii. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.

The first responder on the scene has the responsibility to secure, preserve, and control access to and from the crime scene.

a. If the abuse occurred within a time period that still allows for the collection of evidence request that the alleged victim not take any actions that could destroy physical evidence (i.e. washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and)

b. If the abuse occurred within a time period that still allows for the collection of evidence request that the alleged abuser does not take any actions that could destroy physical evidence (i.e. washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating)

- Secure cell or dorm door.
- Control of the crime scene shall be the responsibility of the first deputy on scene until relieved.
- Allow as few people as necessary to enter the scene.

iii. Ensure alleged victim is evaluated by Medical. If requested by the victim, attempt to make available to the victim a victim advocate from a rape crisis center, in person or by other means. (All of these efforts are to be fully documented.)

iv. Ensure alleged inmate aggressor is seen and evaluated by Medical.

v. Prepare a complete PREA Packet to include:

vi. PREA Sexual Assault Checklist

- vii. Chronological event log
- viii. Synopsis of event
- viii. Action taken by the deputy/supervisor

Supporting documentation to include:

Jail Operations will prepare the following documents for the PREA Packet:

- Incident Report by the first responder
- Copy of events recorded in the log book
- Attach memorandums that have been written surrounding the events
- Supervisor reports of the incident
- After packet has been completed the information will be given to Internal Affairs.
- Internal Affairs will prepare the following documents for the PREA Packet
- Investigative Reports
- Photographs
- Gather any relevant medical or mental health reports
- Take witness statements
- Handwritten Notes that may have been written
- Any other relevant documents, photographs, notes, etc.

The PREA Coordinator will prepare the following documents for the PREA Packet

- Booking Face Sheet
- PREA Reassessment Form

vi. Notify the Sheriff, PREA Coordinator, Internal Affairs, Jail Operations and Medical.

vii. The PREA packet will be forwarded to Internal Affairs. Internal Affairs will forward a copy of the completed PREA packet to the PREA Coordinator. The PREA Coordinator will review the documentation for accuracy and request any additional documentation that may be needed

1. In the event that an actual rape occurs, a copy of the PREA packet will be provided to Internal Affairs on the scene to investigate.

2. If the first staff responder is a civilian staff member, the responder shall be required to:

- i. Request that the alleged victim not take any actions that could destroy evidence.
- ii. Immediately notify security staff.

Analysis/Reasoning:

The Richmond City Justice Center policy requires the first security staff member to respond to an alleged sexual abuse perform the following steps:

- Separate the alleged victim and abuser;
- Preserve and protect any crime scene until appropriate steps can be taken to collect

any evidence;

- If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim and abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

Facility policy requires a non-security first responder to request the alleged victim not take actions that could destroy physical evidence and notify a security staff member. The Auditor conducted interviews with security and non-security staff first responders. All security first responders were asked to explain the actions they take when responding to a sexual abuse incident. Each security staff member was able to articulate an appropriate response which included the above listed actions following an alleged sexual abuse incident. The Auditor asked each how they would ensure the alleged victim and alleged abuser were separated. Staff informed they immediately lock the living unit down and remove the victim and abuser from the living unit. Staff stated they would immediately call for assistance and inform their supervisor.

Each staff member was asked how they ensure the protection of evidence of the crime scene. The Auditor was informed the area would be blocked off and placed under constant supervision until evidence could be processed by the investigator. Staff informed the Auditor a logbook will be maintained to ensure each person who entered the crime scene and any removal of items would become a matter of record.

Medical personnel at the facility have been trained on how to preserve physical evidence while treating victims of sexual abuse. Medical personnel informed they would first ensure a victim's immediate medical needs are met. Medical personnel stated they would request the victim not use the restroom, shower, or take any other actions which could destroy evidence. Staff explained how they attempt to preserve evidence while treating a sexual abuse victim. Medical staff informed they would immediately notify a supervisor if they were the first person to be notified of an alleged sexual abuse.

In the past 12 months, there were (5) number of allegations that a confined person was sexually abused. Of these allegations of sexual abuse in the past 12 months, there were (1) number of times the first security staff member to respond to the report separated the alleged victim and abuser. In the past 12 months, there were 0 number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence.

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, there were 0 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.

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, there were 0 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

	<p>appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p>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, there were 0 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.</p> <p>Of the allegations that an inmate was sexually abused made in the past 12 months, there were (2) number of times a non-security staff member was the first responder.</p> <p>Conclusion:</p> <p>The Auditor determined both security and non-security staff are knowledgeable in their duties as first responders of sexual abuse. The Auditor reviewed facility policies and procedures and conducted interviews with security and non-security staff to determine the facility meets the requirements of this standard.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Coordinated Response Plan • Staff Interviews <p>Auditor's Discussion:</p> <p>The facility has a written Coordinated Response Plan. The plan includes response actions for staff first responders, medical and mental health practitioners, investigators and facility leadership.</p> <p>Analysis/Reasoning:</p> <p>During interviews with specialized staff members the Auditor asked first responders, medical and mental health practitioners, investigator, and leadership questioned regarding their duties in response to an alleged sexual abuse incident. Each specialized staff interviewed by the Auditor was knowledgeable regarding their required actions. The totality of responses confirms the facility has ensured appropriate actions are taken in response to an alleged sexual abuse incident and staff has been appropriately trained to respond to such incidents.</p>

	<p>Conclusion:</p> <p>The Auditor determined the facility maintains an appropriate institutional plan that coordinates the actions of personnel following an incident of sexual abuse. Based on a review of the facility’s policies, procedures, coordinated response plan and interviews with staff, the Auditor determined the facility meets the requirements of this standard.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Memo: The Richmond City Sheriff's Office does not participate in collective bargaining. • Staff interviews <p>Auditor’s Discussion:</p> <p>The Richmond City Sheriff’s Office does not participate in any collective bargaining agreements or other agreements that limit this Sheriff’s Office ability to remove alleged staff sexual abusers from contact with inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.</p> <p>All sworn or civilian, contractors and volunteers are held accountable for compliance with the Code of Ethics, as outlined in the Sheriff’s Office Policy (SOP 115). Should an employee conduct himself/herself in such a manner as to violate the Code of Ethics, it will be grounds for disciplinary action.</p> <p>Analysis/Reasoning:</p> <p>The outcome of investigations involving sexual misconduct will be maintained in a PREA investigation file, indefinitely following a determination that the allegation is either substantiated, unsubstantiated or unfounded.</p> <p>Conclusion:</p> <p>The Auditor determined facility personnel do not participate in a collective bargaining agreement. After a review of facility policies, procedures the Auditor determined the facility meets the requirements of this standard.</p>

115.67	Agency protection against retaliation
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	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <hr/> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy – Agency Protection Against Retaliation – PREA 115.67 • Interview with PREA Coordinator • Interviews with Confined Persons <p>Auditor’s Discussion:</p> <p>RCJC has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperates with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and designate the PREA Coordinator with monitoring retaliation. The PREA Coordinator monitors weekly for 90 days.</p> <p>RCJC has multiple protection measures, such as housing changes or transfers for confined victims or abusers, removal of alleged staff or confined abusers from contact with victims, and emotional support services for confined persons or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.</p> <p>Analysis/Reasoning:</p> <p>For at least 90 days following a report of sexual abuse, the RCJC monitors the conduct and treatment of confined persons or staff who reported the sexual abuse and of confined persons who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by confined persons or staff, and are act promptly to remedy any such retaliation.</p> <p>There were (0) number of times an incident of retaliation occurred in the past 12 months. There are periodic status checks performed. Items RCJC monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. RCJC continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. If any other individual who cooperates with an investigation expresses a fear of retaliation, RCJC takes appropriate measures to protect that individual against retaliation.</p> <p>Conclusion:</p> <p>The Auditor determined the facility meets the requirements of this standard.</p>
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115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Policy, Materials, Interviews and Other Evidence Reviewed

- Policy – Post-Allegation Protective Custody – PREA 115.68
- Interview with Segregated Housing Unit Staff
- Segregation Housing Records
- Classification Records
- Observations

Auditor’s Discussion:

The Richmond City Justice Center has a policy which requires the protection of a confined person who is alleged to have suffered sexual abuse. The policy requires the use of segregated housing be subjected to the requirements of PREA standard 115.43.

Analysis/Reasoning:

The Auditor reviewed the agency’s policy regarding the use of segregation housing. The Post Allegation Protective Custody policy states any use of segregated housing to protect a confined person who is alleged to have suffered sexual abuse shall be subject to the requirements of Policy-PREA 115.43. Agency Policy Protective Custody includes the requirements of PREA standard 115.43 in the case segregation housing is utilized to ensure the protection of a sexual abuse victim.

The Auditor conducted formal and informal interviews with staff who supervise confined persons in segregation housing. The Auditor asked if they have supervised a confined person who has been placed in segregation housing after allegedly suffering sexual abuse. Each informed the Auditor they were unaware of a confined person being housed in segregation for that reason. The staff was asked if confined persons in segregation housing have access to programs, education, work and other privileges. The Auditor was informed confined persons do have access to such, as long as legitimate security concerns allow such.

The Auditor participated in a detailed tour of the facility, including segregation housing. A review of segregation records revealed there were no confined persons housed in segregation for protection as a sexual abuse victim at the time of the audit. The Auditor observed multiple housing areas the facility can utilize to protect male and female sexual abuse victims without having to place the victim in segregation housing.

The facility reported no incident in which a confined person suffered sexual abuse in the previous 12 months. The facility reported there were no confined persons placed in segregation housing for protection as a sexual abuse victim in the previous 12 months.

Conclusion:

The facility’s policy includes the elements of PREA standard 115.43 to ensure sexual abuse victims receive privileges, programming, education, and work opportunities if a victim is placed in segregated housing for protection. After a thorough review of the facility’s policies and procedures, segregation records, classification records, making observations, and interviewing staff the Auditor determined the facility meets the

	requirements of this standard.
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115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Criminal/Administrative Investigations - PREA 115.71 • SOP- 118-Investigations • Investigator Training Records • Interview with Sexual Abuse Investigator • Investigative Files • Observations <p>Auditor's Discussion:</p> <p>The Auditor conducted a formal interview with the facility's Sexual Abuse Investigator. The Investigator discussed the procedure he utilizes when conducting an investigation. The start of the investigation is with a review of information maintained in the Offender Management System. The Investigator then interviews the victim, perpetrator and any witnesses, including staff witnesses. The Auditor asked what the Investigator is looking for when he reviews information maintained in the Offender Management System. The Investigator explained he reviews criminal history, disciplinary history, looks for any current or past grievances, and any Incident Reports submitted regarding the victim, abuser, and witnesses.</p> <p>Analysis/Reasoning:</p> <p>The facility has received zero (0) number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>Conclusion:</p> <p>The Auditor was able to conclude the facility Investigator is conducting appropriate investigations of sexual abuse and sexual harassment. The Investigator has received appropriate training and is aware of the requirements of this standard. The Auditor determined the facility meets the requirements of this standard.</p>

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard

	<p>Auditor Discussion</p> <hr/> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy – Evidentiary Standards for Administrative Investigations – PREA 115.72 • Investigative Reports • Interview with Investigators <p>Auditor’s Discussion:</p> <p>The Richmond City Justice Center has a policy that imposes no standard higher than a preponderance of evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Analysis/Reasoning:</p> <p>The Auditor conducted a formal interview with the facility’s Sexual Abuse Investigator. The Investigator was questioned about the meaning of preponderance. The Investigator explained preponderance means – more evidence to support a determination in either finding.</p> <p>Conclusion:</p> <p>The Auditor was able to determine the Investigator utilizes preponderance as the basis for his determinations. The Auditor reviewed the facility’s policies and procedures, investigative reports, and interviewed an agency investigator and determined the facility meets the requirements of this standard.</p>
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115.73	Reporting to inmates
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <hr/> <p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy – Reporting to Confined persons – PREA 115.73 • Interview with Investigator <p>Auditor’s Discussion:</p> <p>Policy Reporting to Inmates</p> <p>The Richmond City Justice Center policy requires confined persons be notified whether a sexual abuse allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation. If the facility’s Sexual Abuse Investigator does not conduct the investigation, he/she is required to request the relevant information from the investigative agency so he/she may inform the confined person at the conclusion of the investigation. Facility policy requires a confined person be notified of actions taken following an allegation of sexual abuse</p>

against a staff member (unless the determination was unfounded). Those actions include the following:

- The staff member is no longer posted within the confined person’s housing area;
- The staff member is no longer employed by the RCJC;
- The RCJ learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- The RCJC learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

After a confined person alleges another confined person committed sexual abuse against the confined person policy requires the confined person be informed whenever:

- The RCJC learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
- The RCJC learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

Policy mandates the notifications be documented. There is no obligation to inform a confined person of the above listed actions if the confined person is released from the agency’s custody.

Analysis/Reasoning:

The Auditor conducted a formal interview with the agency’s Sexual Abuse Investigator. The Investigator informs confined persons of the results of an investigation at the conclusion of the investigation. The Auditor asked who informs the confined person victim when charges are placed on the abuser or the abuser has been convicted. The Investigator informed the Auditor investigative staff makes those notifications.

There were (5) number of criminal and/or administrative investigations of alleged confined person sexual abuse that were completed by the agency/facility in the past 12 months. Of the alleged sexual abuse investigations that were completed in the past 12 months, there were (5) number of confined persons who were notified, verbally or in writing, of the results of the investigation.

Conclusion:

The Auditor concluded the RCJC informs confined persons of investigative findings after the conclusion of an investigation. The Auditor reviewed facility policies and procedures and conducted an interview with a Sexual Abuse Investigator to determine the facility meets the requirements of this standard.

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

Policy, Materials, Interviews and Other Evidence Reviewed

- Policy - Disciplinary Sanctions for Staff - PREA 115.76
- Interviews with Staff
- Investigative Report

Auditor's Discussion:**Policy - Disciplinary Sanctions for Staff**

Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are 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.

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, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

Analysis/Reasoning:

The Auditor reviewed facility policy and procedures and interviewed staff to determine the facility meets the elements of this standard. The facility has policies and procedures in place to ensure staff are appropriately disciplined for violations of the facility's sexual abuse and sexual harassment policies.

In the past 12 months, there were (0) number of staff from the facility who have violated agency sexual abuse or sexual harassment policies.

In the past 12 months, there were (0) number of staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies.

In the past 12 months, there were (0) number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies.

In the past 12 months, there were (0) 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.

Conclusion:

The Auditor determined the facility meets the requirements of this standard.

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Corrective Actions for Contractors and Volunteers- PREA 115.77 • Interview with Staff • Interviews with Contractor <p>Auditor's Discussion:</p> <p>Policy - Corrective Actions for Contractors and Volunteers</p> <p>The Richmond City Justice Center has a policy which mandates contractors and volunteers who engage in sexual abuse are prohibited from contact with confined persons. The facility's policy is to notify law enforcement agencies and relevant licensing bodies, unless the act was clearly not criminal in nature.</p> <p>Analysis/Reasoning:</p> <p>The Richmond City Justice Center has had no reported incidents in which a volunteer or contractor has engaged in sexual abuse or sexual harassment in the previous 12 months. The Auditor conducted formal interviews with contract personnel. Each contract personnel interviewed was aware of the agency's discipline sanctions for violating sexual abuse or sexual harassment policies.</p> <p>The facility's leadership is aware of the requirement to notify relevant licensing bodies following a contractor or volunteer's participation in sexual abuse. Staff informed the Auditor a contractor or volunteer would be prohibited from confined person contact if determined to have participated in an act of sexual abuse. The facility does not notify relevant licensing bodies if the act committed by a volunteer or contractor was clearly not criminal.</p> <p>Conclusion:</p> <p>The Richmond City Justice Center maintains appropriate policies to ensure contractors and volunteers are removed from confined person contact after committing an act of sexual abuse or sexual harassment. The Auditor reviewed the facility's policy and procedures and conducted formal interviews with staff and contract personnel and made a determination the facility meets the requirements of this standard.</p>

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Policy, Materials, Interviews and Other Evidence Reviewed

- Policy – Discipline Sanctions for Confined Persons – PREA 115.78
- Interview with Sexual Abuse Investigator
- Interviews with Medical Professionals
- Interview with Mental Health Professionals
- Interviews with Confined persons

Auditor’s Discussion:**Policy - Discipline Sanctions for Confined Persons**

The agency’s policy allows staff to discipline a confined person for participating in an act of confined person-on-confined person sexual abuse. Confined persons will not be disciplined for sexual contact with a staff member if the staff member consented to the act. Policy requires discipline sanctions only after the confined person participates in a formal disciplinary hearing and the hearing committee finds evidence of guilt.

The agency’s policy allows staff to discipline a confined person for acts of sexual abuse after a criminal finding of guilt. According to facility policy, sanctions following the discipline process must consider the following:

- The nature and circumstances of the abuse committed
- The confined person’s discipline history
- The sanctions imposed for comparable offenses by other confined persons with similar histories

The discipline process is required to consider whether the confined person’s mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed. Policy allows for the consideration whether to require the offending confined person participate in mental health treatment as a condition of access to programming or other benefits if medically necessary or appropriate as determined by the mental health services staff.

Analysis/Reasoning:

In the past 12 months, there was (0) number of administrative findings of confined person-on-confined person sexual abuse that have occurred at the facility. In the past 12 months, there were (0) number of criminal findings of guilt for confined person-on-confined person sexual abuse that have occurred at the facility.

The Auditor conducted formal interviews with medical and mental health practitioners. The Auditor was informed counseling and other interventions are offered in an attempt to address and correct underlying reasons or motivations for sexual abuse. The Auditor was informed a confined person’s participation or non-participation in such interventions do not hinder the confined persons’ ability to attend programming or other benefits. The facilities disciplinary policies, procedures and practices are appropriate to ensure proper disciplinary measures against a confined person.

Conclusion:

The Auditor reviewed policy and procedures, interviewed multiple staff and a confined

	person and determined the facility meets the requirements of this standard.
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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Medical and Mental Health Screenings; History of Sexual Abuse - PREA 115.81 • Inmate Classification Records • Inmate Medical and Mental Health Records • Interviews with Medical Professionals • Interview with Mental Health Professional • Interviews with Confined Persons <p>Auditor's Discussion:</p> <p>Policy - Medical and Mental Health Screenings; History of Sexual Abuse</p> <p>The Richmond City Justice Center policy requires staff to offer a follow-up meeting with a medical or mental health professional and must occur within 14 days of arriving at the facility for any confined person who informs staff he/she previously experienced sexual victimization. The policy applies to any confined person who reported whether the abuse occurred in an institutional setting or in the community.</p> <p>Policy stipulates information related to sexual victimization and abusiveness that occurred in an institutional setting be strictly limited to medical, mental health, and other staff as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law. Policy requires medical and mental health practitioners to obtain informed consent from confined persons before reporting information about prior victimization that did not occur in an institutional setting, unless the confined person is under the age of 18.</p> <p>Analysis/Reasoning:</p> <p>The Auditor conducted a formal interview with a mental health professional. The mental health professional informed the Auditor an automatic notification is sent by email when a confined person answers yes to the sexual abuse intake questions. The mental health professional stated confined persons typically meet with the mental health professional within days when they request a 14-day follow-up. The Auditor asked who the mental health professional shares information with relating to sexual victimization or abusiveness that occurred in an institutional setting. The mental health professional informed only those who need to know. The mental health professional stated informed consent would be obtained prior to sharing information</p>

	<p>related to sexual victimization suffered in the community. The Auditor was informed there has been no need to report victimization suffered in a community setting with anyone other than a medical or mental health professional.</p> <p>The Auditor conducted formal interviews with medical professionals. The Auditor asked who they share information relating to sexual victimization or abusiveness that occurred in an institutional setting with. Medical professionals stated they inform supervisory staff, and those who make treatment and classification decisions. Medical records are maintained electronically through Core log. Each medical and mental health practitioner has an individual username and password to gain access. The Auditor asked medical professionals if they share information related to sexual victimization that occurred in a community setting. The Auditor was informed if there was ever a reason to share that information informed consent would be obtained first. Medical professionals are aware of obtaining informed consent prior to reporting victimization that occurred in a community setting.</p> <p>Conclusion:</p> <p>The Auditor concluded confined persons are offered a follow-up with a medical or mental health professional after reporting they have suffered sexual victimization. Medical and mental health practitioners inform only those with a “need to know” of information related to sexual victimization or abusiveness. The Auditor reviewed the facility’s policies and procedures, confined person medical and classification records, and conducted interviews with medical and mental health practitioners and confined persons. After a thorough review the Auditor concluded the facility meets the requirements of this standard.</p>
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Access to Emergency Services - PREA 115.82 • MOU-RCSO and Bon Secours Richmond Health System • Interviews with Medical professionals • Interview with Sexual Assault Nurse Examiner • Interviews with First Responders • Staff Training Records <p>Auditor’s Discussion:</p> <p>Policy - Access to Emergency Services</p> <p>The Richmond City Justice Center policy requires confined person victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis</p>

intervention services. The nature and scope of treatment and services are determined by the medical and mental health practitioners. The facility offers confined person victims of sexual abuse 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. Policy requires security staff members to take preliminary steps to protect a victim pursuant to policy when no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made. Security staff is required to immediately notify the appropriate medical and mental health practitioners. The facility does maintain 24-hour medical coverage.

Analysis/Reasoning:

The Auditor asked contracted medical personnel and deputies if confined person victims of sexual abuse are charged a fee for treatment services related to sexual abuse. The Auditor was informed all services related to sexual abuse treatment are free to confined person victims of sexual abuse. There were no confined person victims of sexual abuse for the Auditor to interview. Interviews with confined persons reveal they are aware services related to sexual abuse victimization are offered at no cost to the confined person victim.

The Auditor conducted an interview with the Sexual Assault Nurse Examiner. The SANE informed the Auditor confined person victims are offered timely access to emergency contraception and sexually transmitted infections prophylaxis. The Auditor asked if the confined person victim is billed for such services. The SANE does not bill the confined person victim for services related to sexual victimization.

Conclusion:

The facility provides access to timely and unimpeded access to emergency medical services. Contracted medical personnel provide confined person victims with sexually transmitted infection prophylaxis and emergency contraception. VCU Health System Authority and the Richmond City Sheriff's Office have entered into an MOU agreement in order to comply with PREA. VCU Health will provide advocates for emotional support services related to sexual abuse and /or violence for the residents at the Richmond City Justice Center. The Auditor reviewed the facility's policies and procedures, training records, and interviewed staff, medical contract personnel and confined persons and determined the facility meets the requirements of this standard.

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Ongoing Health Care - PREA 115.83 • Interviews with Medical Professionals • Interviews with Mental Health Professional • Interview with SANE <p>Auditor's Discussion:</p> <p>Policy - Ongoing Health Care</p> <p>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. RCJC provides such victims with medical and mental health services consistent with the community level of care.</p> <p>Analysis/Reasoning:</p> <p>Confined person victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results, victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.</p> <p>Confined person victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Conclusion:</p> <p>After a thorough review the Auditor concluded the facility complies with the requirements of this standard.</p>
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy-Sexual Abuse Incident Reviews-115.86 • Incident Review Reports • Interviews with Staff <p>Auditor's Discussion:</p> <p>Policy-Sexual Abuse Incident Reviews</p> <p>RCJC conducts a sexual abuse incident review at the conclusion of every sexual abuse</p>

	<p>investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.</p> <p>Analysis/Reasoning:</p> <p>The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at RCJC and they examine the area in RCJC where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.</p> <p>In the past 12 months, there were (5) criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only “unfounded” incidents.</p> <p>In the past 12 months, there were (3) 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.</p> <p>Conclusion:</p> <p>After a thorough review the Auditor concluded the facility complies with the requirements of this standard.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy - Data Collection - PREA 115.87 • Agency Website • Interviews with Staff • PREA Annual Report <p>Auditor’s Discussion:</p> <p>Policy - Data Collection</p> <p>RCJC policy requires accurate, uniform data collection for every allegation of sexual</p>

abuse utilizing a standardized instrument and set of definitions. The data must be aggregated annually by the PREA Coordinator. Facility policy requires the instrument contain incident data sufficient enough to answer all questions from the most recent version of the United States Department of Justice's, Survey of Sexual Violence. When receiving the Survey of Sexual Violence, the PREA Coordinator is required to submit the previous calendar year's data to the U. S. Department of Justice no later than June 30th.

The Auditor reviewed the facility's 2023 - 2025 "PREA Annual Report" published on the Richmond City Sheriff's Office website. The data collected included definitions of the following:

- Inmate-on-inmate nonconsensual sex acts
- Inmate-on-inmate abusive sexual contact
- Inmate-on-inmate sexual harassment
- Staff-on-inmate sexual victimization
- Staff sexual misconduct
- Staff sexual harassment
- Sexual abuse
- Sexual abuse of an inmate by another inmate
- Sexual abuse of an inmate by a staff member, contractor, or volunteer
- Voyeurism by a staff member, contractor, or volunteer
- Sexual harassment

Data reviewed by the Auditor for each report was aggregated from January 1st to December 31st. Both facility reports can be accessed by the public on the Newport News Jail's website. The Jail does not contract with a private facility for confinement of its inmates as such, is not required to aggregate data collected from a private facility.

The Auditor interviewed staff responsible for collecting and aggregating the facility's data. Staff informed the Auditor data is collected from investigative reports. Investigative reports include supporting documents such as, Incident Reports, Incident Reviews, Discipline Reports, logbook copies and other supporting documents. The Survey of Sexual Violence was not provided to the Richmond City Justice Center for submission during this audit period.

The Auditor reviewed facility policy which includes definitions sufficient enough to answer questions of the U. S. Department of Justice's, Survey of Sexual Violence.

Conclusion:

The Auditor observed evidence the facility is collecting and aggregating sexual abuse data annually. The reported data utilizes a standardized set of definitions. The Auditor reviewed the facility's policies and procedures, website, PREA Annual Report, and interviewed staff and determined the facility meets the requirements of this standard.

	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy – Data Review for Corrective Action • PREA Annual Report • Agency Website • Interview with Staff <p>The auditor reviewed the facility’s website. The website includes an annual report of data reviewed. The annual report titled, “PREA Annual Data Collection and Review Report” can be accessed on the document page listed on the facility website.</p> <p>The auditor observed sufficient evidence the Richmond City Justice Center completes an annual review of collected and aggregated sexual abuse data. The report addresses problem areas and corrective actions taken and was approved by the Sheriff. The auditor reviewed the facility’s website, PREA Annual Data Collection and Review Report and interviewed staff to determine the facility meets the requirements of this standard.</p> <p>Conclusion:</p> <p>After a thorough review the auditor concluded the facility complies with the requirements of this standard.</p>

115.89	Data storage, publication, and destruction
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Policy – Data Storage, Publication, and Destruction – PREA 115.89 • Agency Website • Annual Report • Interview with Staff • Observations <p>The facility’s policy requires the Professional Standards Bureau ensure sexual abuse data is securely retained. Policy requires the Operations Bureau make all aggregated sexual abuse data readily available to the public at least annually in the annual report or through other means. Policy stipulates personal identifiers will be removed. The Professional Standards Bureau is required to maintain sexual abuse data for at least 10 years after the date of initial collection, unless Federal, State, or local law requires</p>

	<p>otherwise.</p> <p>The Auditor conducted a formal interview with a staff member from the facility's Professional Standards Bureau. The staff member informed the collected data is maintained electronically in a computer database. The Auditor was informed information for the aggregated sexual abuse data is derived from investigative reports.</p> <p>The Auditor reviewed the facility's website. The website included annual sexual abuse data collection in an annual report published on its website. The Auditor reviewed the sexual abuse data published on the website and found no personal identifiers within. The Auditor was informed sexual abuse and sexual harassment data is maintained for a minimum of 10 years after collection. A username and password is required to gain access to the computers utilized by the Professional Standards Bureau.</p> <p>Conclusion:</p> <p>The Auditor reviewed the facility's website, collected data, made observations, and interviewed staff and determined the facility meets the requirements of this standard.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy, Materials, Interviews and Other Evidence Reviewed</p> <ul style="list-style-type: none"> • Previous PREA Audit Report • Facility Tour • Correspondence from Confined Person • Interactions with Staff <p>The facility provided the auditor with a tour of the facility in its entirety. The auditor was provided a private area to conduct interviews with staff and confined persons. All documents, files, video, and other information requested by the auditor were provided by facility staff.</p> <p>During informal interviews with confined persons staff moved away from the auditor to allow the confined person privacy when responding to the auditor's questions. Prior to arriving on site, the auditor sent a letter to be posted in all confined person living areas which included the auditor's address. The auditor found sufficient evidence the Richmond City Justice Center meets the requirements of this standard.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Policy, Materials, Interviews and Other Evidence Reviewed

- Agency Website
- Previous PREA Audit Reports

Auditor Discussion:

The agency has published its previous PREA Audit reports on its website.

Analysis/Reasoning:

The Auditor reviewed the agency's website which includes a link for its previous PREA Audit reports. Richmond City Justice Center was last audited in March 2023.

Conclusion:

The Auditor determined the agency meets the requirements of this standard.

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

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

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

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

	facility does not have female inmates.)	
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.15 (f)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes

	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates 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 with inmates with disabilities including inmates who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	

	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate 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	yes

	consent or refuse?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b) Hiring and promotion decisions		
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c) Hiring and promotion decisions		
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d) Hiring and promotion decisions		
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e) Hiring and promotion decisions		
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f) Hiring and promotion decisions		
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have	yes

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

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

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

	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with	yes

	inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	

	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes

	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	

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

	health care practitioners who work regularly in its facilities.)	
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.)	na
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following	yes

	criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of	yes

	being sexually abusive, to inform: Education Assignments?	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (d)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (e)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (f)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (g)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they	yes

	are at high risk of sexual victimization have access to: Programs to the extent possible?	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
115.43 (c)	Protective Custody	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation	yes

	can be arranged?	
115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain 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.)	yes
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	

	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from 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,	yes

	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.)	
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days?	yes

	(N/A if agency is exempt from this standard.)	
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, 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.)	yes
	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	yes

	understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual 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	yes

	confidentiality, at the initiation of services?	
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report	yes

	required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	
	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
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	yes

	with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
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	yes

	evidence, including any available physical and DNA evidence and any available electronic monitoring data?	
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	

	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
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	yes

	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?	
	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
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	yes

	have engaged in sexual abuse?	
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	

	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	

	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental 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
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph §	yes

	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.)	
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	

	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports,	yes

	investigation files, and sexual abuse incident reviews?	
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted	yes

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

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