PREA Facility Audit Report: Final

Name of Facility: Lee Adjustment Center
Facility Type: Prison / Jail
Date Interim Report Submitted: 05/12/2026
Date Final Report Submitted: 07/14/2026

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	■
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	■
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.	■
Auditor Full Name as Signed: Bryan Pearson	**Date of Signature:** 07/14/2026

AUDITOR INFORMATION	
Auditor name:	Pearson, Bryan
Email:	bryan@pearsongroupllc.com
Start Date of On-Site Audit:	03/24/2026
End Date of On-Site Audit:	03/26/2026

FACILITY INFORMATION	
Facility name:	Lee Adjustment Center
Facility physical address:	168 Lee County Adjustment Center, Beattyville, Kentucky - 41311
Facility mailing address:	

Primary Contact

Name:	Danny Dodd
Email Address:	danny.dodd@corecivic.com
Telephone Number:	606-464-1501

Warden/Jail Administrator/Sheriff/Director	
Name:	Danny Dodd
Email Address:	danny.dodd@corecivic.com
Telephone Number:	606-464-1501

Facility PREA Compliance Manager	
Name:	Mitchell Brandenburg
Email Address:	mitchell.brandenburg@corecivic.com
Telephone Number:	(606) 464-1506
Name:	Jason Sizemore
Email Address:	jason.sizemore@corecivic.com
Telephone Number:	6064641502
Name:	Tenicia Moore
Email Address:	tenicia.moore@corecivic.com
Telephone Number:	(606) 464-1584

Facility Health Service Administrator On-site	
Name:	Lisa Dickerson
Email Address:	ldickerson@wellpath.us
Telephone Number:	606-464-1531

Facility Characteristics

Designed facility capacity:	866
Current population of facility:	849
Average daily population for the past 12 months:	851
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility’s population designation?	Men/boys
Age range of population:	18 - 77 Years/Average 40 Years (As of 1/13/26)
Facility security levels/inmate custody levels:	Facility - Medium / Inmates - Maximum = 1; Medium = 834; Minimum = 8; Community = 6
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	224
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	32
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	17

AGENCY INFORMATION

Name of agency:	CoreCivic, Inc.
Governing authority or parent agency (if applicable):	
Physical Address:	5501 Virginia Way, Suite 110, Brentwood, Tennessee - 37027
Mailing Address:	
Telephone number:	615-263-3000

Agency Chief Executive Officer Information:

Name:	Damon T. Hininger
Email Address:	
Telephone Number:	615-263-3000

Agency-Wide PREA Coordinator Information			
Name:	Jillian Shane	**Email Address:**	jillian.shane@corecivic.com

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:	
3	• 115.13 - Supervision and monitoring • 115.31 - Employee training • 115.35 - Specialized training: Medical and mental health care

Number of standards met:
42

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:	2026-03-24
2. End date of the onsite portion of the audit:	2026-03-26

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?	◉ Yes ○ No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	An interview was conducted with the Director of Rising Center, a local victim advocate organization. A test call was made form the inmate phone system to verify that the number provided to the inmate's went to Rising Center.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	866
15. Average daily population for the past 12 months:	851
16. Number of inmate/resident/detainee housing units:	4

17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	○ Yes ● No ○ 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:	833
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:	9
26. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
27. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	5
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:	113

29. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
30. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	46
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:	16
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:	2
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:	68
34. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.

Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
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:	196
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:	16
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:	32
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	14

41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☐ Age ☐ Race ☐ Ethnicity (e.g., Hispanic, Non-Hispanic) ☐ Length of time in the facility ☒ Housing assignment ☐ Gender ☐ Other ☐ None
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	inmates were selected randomly from each housing unit. Inmates could not be selected based on geographical diversity due to the information pertaining to where inmates are from geographically is not provided to the auditor. 15 inmates were selected, however one was changed to a targeted interview based on the answers provided.
43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	◉ Yes ○ 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):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	16

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".	
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:	1
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ 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. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	The facility was asked to provide a list of inmates that fit the categories for targeted interviews. The PCM said cognitive disabilities were not being tracked, and he could not provide that information.

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:	2
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:	4
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	☒ 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. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	The PCM and Unit Manager said there were no inmates that were limited English proficient at LAC during the onsite audit.
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:	1

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:	1
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:	2
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:	5
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/ detainees in this category:	☒ 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. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	The facility said there were no inmates involuntarily placed in segregation that reported sexual abuse or were determined to be at high risk for sexual abuse. None of the inmates interviewed in segregation were involuntarily placed there for reporting sexual abuse.

57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

58. Enter the total number of RANDOM STAFF who were interviewed:	12
59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☐ Length of tenure in the facility ☒ Shift assignment ☐ Work assignment ☐ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	◉ Yes ○ No
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):	No text provided.

Specialized Staff, Volunteers, and Contractor Interviews

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

62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	14

63. Were you able to interview the Agency Head?	(●) Yes ( ) No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	(●) Yes ( ) No
65. Were you able to interview the PREA Coordinator?	(●) Yes ( ) No
66. Were you able to interview the PREA Compliance Manager?	(●) Yes ( ) No ( ) 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

	☐ Other
68. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ 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)	☐ Education/programming ☐ Medical/dental ☐ Mental health/counseling ☒ Religious ☐ Other
69. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?	◉ Yes ○ 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)	☐ Security/detention ☐ Education/programming ☐ Medical/dental ☒ Food service ☐ Maintenance/construction ☐ Other

70. Provide any additional comments regarding selecting or interviewing specialized staff.	Specialized staff interviews were conducted via Teams virtually during the week prior to the onsite audit. Staff were in a conference room with no other staff present during the interview.

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?	(●) Yes ( ) 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)?	(●) Yes ( ) 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)?	(●) Yes ( ) No
74. Informal conversations with inmates/ residents/detainees during the site review (encouraged, not required)?	(●) Yes ( ) No

75. Informal conversations with staff during the site review (encouraged, not required)?	(●) Yes ( ) No
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).	During the facility tour, a test call was made to the KDOC PREA hotline and the victim advocate hotline.

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.

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?	(●) Yes ( ) No
78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	The facility was asked to provide a list of all inmates received during the review period, a list of all staff with title and hire date, and a list of all contract staff and volunteers with start date. Inmates were randomly selected from each month on the intake list for review of assessments and PREA education. Staff hired during the review period were selected for document review for criminal background check, employment background check, and training document review. Veteran staff and contract staff were selected for criminal background check and training review. Volunteers were selected for PREA training review.

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	8	0	8	0
Staff-on-inmate sexual abuse	8	0	8	0
Total	16	0	16	0

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	1	4	1
Staff-on-inmate sexual abuse	0	9	0	1
Total	0	10	4	2

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	16

86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	○ Yes ● No ○ NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	8
88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	○ Yes ● No ○ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	● Yes ○ No ○ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	8
91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	○ Yes ● No ○ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	(●) Yes ( ) No ( ) NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	1
94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	( ) Yes (●) No ( ) NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	( ) Yes ( ) No (●) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	( ) Yes ( ) No (●) NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

Staff-on-inmate sexual harassment investigation files	
98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	○ Yes ● No ○ 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?	● Yes ○ No ○ 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.	No text provided.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ● No

Non-certified Support Staff	
103. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ● No

AUDITING ARRANGEMENTS AND COMPENSATION	
108. Who paid you to conduct this audit?	● The audited facility or its parent agency ○ My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option) ○ A third-party auditing entity (e.g., accreditation body, consulting firm) ○ Other

Standards
Auditor Overall Determination Definitions
• Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC policy 14.7 Sexual Abuse Prevention provides a zero-tolerance policy statement that states “Any sexual act, sexual contact or sexual offense between an offender and a staff member, visitor or other offender shall be prohibited. No offender, either incarcerated or under the supervision of the Department of Corrections, can give consent to any sexual relationship with a staff member. Any acts as defined in this policy that are conducted outside of the staff member’s normal duties shall be considered a violation of this policy. The Department of Corrections has zero tolerance toward all forms of sexual abuse and sexual harassment.” CoreCivic policy 14-07-01 Sexual Abuse Prevention and Intervention states “CoreCivic has mandated zero-tolerance towards all forms of sexual abuse and sexual harassment. Such conduct is prohibited by this policy and will not be tolerated.” The policy provides staff with information for preventing, detecting, and responding to sexual abuse and sexual harassment. This includes definitions for prohibited behavior and sanctions.

	Inmate Interviews - 31 inmates were interviewed during the onsite audit. All inmates interviewed said they were provided with some kind of information about PREA when they arrived. Most said the information included the facility's zero tolerance policy toward sexual abuse and sexual harassment through the PREA brochure and handbook. Some said they couldn't remember the details about the information. Random Staff Interviews - All staff interviewed said the zero-tolerance policy was provided during annual PREA training and could accurately describe the policy requiring staff to report all knowledge or suspicion of sexual abuse, sexual harassment, staff failure to report, and retaliation against an inmate or staff that reported. Staff demonstrated knowledge from the PREA training of CoreCivic's approach to preventing, detecting and responding to reports of sexual abuse and sexual harassment. Staff could identify signs of sexual abuse and know how to respond to reports. Staff are given a quick reference card that provides the steps to follow in response to a report of sexual abuse or sexual harassment. b) PREA Coordinator Interview – The PREA Coordinator stated during her interview that she has sufficient time and authority to manage the agency's efforts to comply with the PREA standards in all of CoreCivic's facilities. She reports directly to the Vice President of Core Services. Organizational Chart Review – The CoreCivic organizational chart was provided for review in the Pre-Audit Questionnaire. It shows the Senior Director of the PREA Programs & Compliance division reporting directly to the Vice President of Core Services. c) Lee Adjustment Center Org Chart provided indicates the facility PREA Compliance Manager is the Assistant Warden and reports directly to the Warden. PCM Interview – The Assistant Warden said he has the time and authority to complete his duties as the PCM. Warden Interview - The Warden reported having regular communication with the PCM/AW regarding issues involving PREA compliance at the facility. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.

115.12	**Contracting with other entities for the confinement of inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Lee Adjustment Center does not contract for the confinement of inmates. The Kentucky DOC has a contract with CoreCivic to house KDOC inmates at the Lee Adjustment Center. The contract contains the following requirements "3.17. Comply with the Prison Rape Elimination Act ("PREA") (42 U.S.C. §15601,et seq.). 3.18.

	Successfully attain within three years and maintain thereafter PREA accreditation throughout the term of this Agreement." The Kentucky DOC has a Contract Monitor staff that is assigned to LAC to monitor CoreCivic's compliance with the contract terms, to include PREA compliance.

115.13	**Supervision and monitoring**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	a) LAC policy 14-07-01 states "FSC will develop, in coordination with the facility, a staffing plan that provides for adequate levels of staffing to protect offenders against sexual abuse. The location of video monitoring systems will be considered when determining adequate levels of staffing." Tour Observations - During the tour this auditor observed staff in all areas of the facility that inmates were present providing an appropriate level of monitoring. There were also cameras covering common areas, hallways, outside walkways, recreation areas, housing dayroom areas, the kitchen, dining hall, and the medical unit. Staff were observed making rounds in the housing units and the program building. The logbooks in the housing units had unannounced rounds documented and supervisory staff were observed signing into the logbook. Warden Interview – The Warden said staffing is reviewed on an ongoing basis. He meets with his HR Manager, Assistant Warden/PCM weekly to discuss current vacancies and develops plans to fill them. The warden said the staffing plan is based on the contract with KDOC and covers the mandatory posts that must be filled with overtime when there is an absence of scheduled staff. He said he usually only closes discretionary posts due to staff absences. He reviews shift rosters and shift reports to monitor the use of overtime and mandatory post closings. If a mandatory post needs to be closed, he would be called immediately. The Warden said there have been no mandatory posts closed during the review period. PCM Interview – The PCM/AW said the staffing is discussed on an ongoing basis. An annual review of the staffing plan was conducted in January of this year. He said a form is completed that documents the review. The Warden signs it and sends it to the CoreCivic PREA Coordinator for review. b) LAC policy 14-07-01 states "The facility shall make its best effort to comply, on a regular basis, with the approved PREA Staffing Plan and shall document and justify all deviations." The policy requires the Chief of Security to review the staffing plan in conjunction with the daily shift roster and notify the PCM of any deviations. Warden interview – The Warden said any deviations would be documented on the daily shift reports. If it is a mandatory post closing, it is documented on an incident report.

	c) LAC policy 14-07-01 states “Whenever necessary, but no less frequently than once each year, an annual PREA staffing plan assessment will be completed.” The PCM is required to document the annual review on a form 14-7-1I Annual PREA Staffing Plan Assessment and send to the Warden for review. The policy then requires the review to be sent to the CoreCivic PREA Coordinator. The CoreCivic PREA Coordinator will assess whether adjustments need to be made to staffing or video monitoring systems. Changes must be approved by the Business Vice President. PREA Coordinator Interview – The PREA Coordinator said she reviews and signs the annual staffing plan review from the facility. She will also review staffing when there has been a significant change that would require re-evaluation of the plan. Document Review - The 2025 and 2026 Annual Staffing Plan Review was provided for review. They were found to be a form that guides the review with the signature of the PREA Compliance Manager, Warden and CoreCivic PREA Coordinator. d) CoreCivic policy 14-07-01 Sexual Abuse Prevention and Intervention states “Supervisors shall conduct unannounced facility rounds to identify and deter employee sexual abuse and sexual harassment. The occurrence of such rounds shall be documented as an unannounced round in the applicable log (e.g. ADO, post log, shift report, etc.). This practice shall be implemented for all shifts and all areas where offenders are permitted.” Intermediate Supervisor Interviews - Two shift supervisors (Captain) were interviewed and asked how unannounced rounds are conducted and how staff are prevented from warning other staff they are coming. Both stated they do their rounds different each time so staff do not know where they will be going when they leave an area. Both document their rounds in the master control log book and the housing unit log book. Log book entries are completed by the staff conducting the rounds. Inmate Interviews – All inmates reported seeing shift supervisors making rounds daily on both shifts. All inmates said they see staff making rounds in the housing units every half hour in open population housing units or every 15 minutes in restricted housing. Staff Interviews – All staff interviewed said they see the shift supervisor at least once on every shift. All staff said they are required to make rounds in their housing unit every 30 minutes. Document Review – Housing Unit logbook entries were requested for the 25th to the 27th of three different months during the last year. Shift supervisors were documented making at least one round on every shift, all three days of each month reviewed. The PRC has stated best practice is once per week on each shift. The facility exceeds this provision of the standard by conducting rounds on each shift daily. Lee Adjustment Center maintains a PREA staffing plan designed to provide adequate staffing and video monitoring to protect inmates from sexual abuse. The Warden and PCM reported that staffing is reviewed regularly, mandatory posts have not been

	closed during the review period, and annual staffing plan assessments were completed in 2025 and 2026. The facility documents deviations from the staffing plan when they occur. Supervisors conduct and document unannounced rounds on all shifts and in all areas where inmates are present, with interviews and logbook reviews confirming daily supervisory rounds. Overall, the highlighted evidence supports that the facility exceeds the standard. Based on the information from interviews, tour observations, policies and documents reviewed, it has been determined the facility exceeds the standard.

115.14	**Youthful inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	KDOC policy 18.3 Confinement of Youthful Offenders requires all offenders committed to the Kentucky DOC to be housed at a designated unit at the Kentucky State Reformatory. The Lee Adjustment Center reported on the PAQ the age of the population is 18+ years of age. The Lee Adjustment Center does not house youthful inmates.

115.15	**Limits to cross-gender viewing and searches**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) CoreCivic policy 14-07-01 states “Cross-gender offender strip searches shall not be conducted except in exigent circumstances (that is, temporary unforeseen circumstances that require immediate action in order to combat a threat to security or institutional order) or when performed by medical practitioners.” KDOC policy 9.8 Search requires strip searches to be conducted by same gender staff. Cross gender strip searches are only allowed if exigent circumstances exist. Staff did not report conducting cross gender strip searches and knew they were not allowed except in exigent circumstances. Exigent circumstances were described as an immediate threat to safety and security. Inmate Interviews – All inmates said they have not been strip searched by or in the presence of opposite gender staff while eat LAC. Most reported only being strip

searched at intake.

c) KDOC policy 9.8 Search requires all cross-gender strip searches to be documented in an institutional strip search logbook.

d) KDOC policy 14.7 Sexual Abuse Prevention states "Offenders shall be permitted to shower, perform bodily functions and change clothing without staff of the opposite gender viewing their breasts, buttocks or genitalia except in exigent circumstances or when such viewing is incidental due to routine cell checks." CoreCivic LAC policy 14-7-1 states "Offenders may shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances (that is, temporary unforeseen circumstances that require immediate action in order to combat a threat to security or institutional order) or when such viewing is incidental to routine cell/ checks. Employees of the opposite gender must announce their presence when entering an offender housing unit."

Tour Observations - The facility was toured on the first day of the onsite audit. The tour included all areas where inmates have access: North HU, Lower North HU, South HU, West HU, RHU, Medical, Foodservice, Recreation, Visitation/Security, and Administration. Inmates are not allowed in the maintenance building and none were observed in the building. Maintenance is fenced off from the rest of the facility with controlled movement by staff. Cameras were observed throughout the facility. None had a direct view of an area where inmates would be in a state of undress. This was verified by reviewing all camera views with the Assistant Warden. All inmate bathrooms were observed during the tour. Urinals had walls at the end of each row that blocked opposite gender staff view. Toilets in North and South housing units had one partition wall by the toilet in the farthest corner and a cinder block wall at the end that blocked the view of the toilets from the entrance of the bathroom. Female staff could only see an inmate on a toilet if they walked all the way into the toilet area. The facility executive staff said they were working on installing partition walls around each toilet for modesty screens. Toilets were in cells in the West housing unit. The toilets pointed away from the cell door. Showers in North and South were gang shower rooms with shower curtains that blocked the view of the inmate's genitals and buttocks from opposite gender staff without creating a blind spot. Staff could see an inmate's shoulders and feet at the top and bottom of the curtain. West Housing unit showers provided individual stalls in a row in the dayroom area of the cell house. All stalls had shower curtains. A wall covered the front of the showers providing inmates an additional modesty screen without creating a blind spot. The showers in restricted housing had a small curtain to cover the cuff ports so opposite gender staff could not see the inmate's genitals through it. Inmate restrooms in service/program areas were locked and required staff to provide access to inmates one at a time. Opposite gender staff on the tour group were announced when entering housing units. A light was turned on that also informed inmates that staff of the opposite gender were on the unit. These lights were observed in every housing unit. Signs were observed at the entrance to housing units that reminded staff of the opposite gender announcement.

	Inmate Interviews - All inmates said they felt they could use showers, urinals and toilets without opposite gender staff seeing them in a state of undress. They said female staff did not fully enter the bathroom in North and South housing units when inmates were in the showers or toilets. All Inmates reported hearing female staff make announcements when entering housing units and if they entered bathrooms. Staff Interviews – All staff said the shower curtains blocked their view of the inmate's genitals but did not create a blind spot. They said walls by toilets in North and South housing units provided enough cover to block the view of an inmate's buttocks while on the toilet but they could still see their heads. Female staff said they do not enter the bathrooms beyond the entrance if inmates are in the showers ore toilet area to avoid cross gender viewing however, they can see all areas of the bathroom from the entrance. All staff said opposite gender staff are required to make an announcement when entering a housing unit or wing and when entering an inmate bathroom in housing units or program areas. Based on the information from interviews, tour observations, policies and documents reviewed, it has been determined the facility meets the provisions of this standard.

115.16	**Inmates with disabilities and inmates who are limited English proficient**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention states "Each facility shall provide offender education in formats accessible to all offenders, including those who are limited English proficient, deaf, visually impaired or otherwise disabled, and for offenders who have limited reading skills." The Inmate Handbook provides inmates with information about assistance with disabilities, including the availability of TTY and CapTel equipment for hearing impaired inmates. LAC also has a braille version of the PREA brochure for inmates that are blind. Agency Head Interview – The Vice President said CoreCivic maintains a contract with Voyce for assistance with hearing impaired inmates with video sign language. He said TTY phones are available at all facilities. PREA Education Staff Interview – A Case Manager that provides the PREA education said they are required to go over the materials with inmates individually. During the individual orientation they can determine if the inmate needs accommodation. If the inmate cannot read due to cognitive or visual disability, the staff will read the materials to them. If the inmate has mental health , the Mental Health Director can assist with the orientation. b) LAC provided the account information with Voyce Services, a language interpreter service for LEP inmates. If the inmate cannot speak English, the Case

	Manager would contact the PCM to use the interpreter service. LAC has a Spanish PREA Pamphlet to provide during education that was provided to this auditor. A Spanish PREA Poster was observed posted throughout the facility next to the English posters. The interpreter service would be used to translate materials if a different language is needed. PREA Education Staff Interview – The Case Manager said the facility has a telephonic interpretive service that can be used to communicate with inmate's that a Limited English Proficient when needed. The service can also provide American Sign Language service for deaf inmates that know ASL. He said the PREA brochure and inmate handbook are provided in Spanish and can be translated to other languages using Voyce Services. c) CoreCivic LAC policy 14-07-01 states "Offenders will not be relied upon to provide interpretation services, act as readers, or provide other types of communication assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the offender safety, the performance of first-responder duties, or the investigation of the offender allegations." LAC reported on the PAQ there was no use of an inmate interpreter during the review period. Random Staff Interviews – All staff were asked if an inmate that could not speak English was needing to make a report, would they let another inmate that speaks their language interpret for them. All staff said no as it would be confidential and there could be retaliation. All staff were aware there was an interpretive service and knew a Shift Supervisor or case Management staff could access it. Based on the information from interviews, policies and documents reviewed, it has been determined that the facility meets all provisions of the standard.

115.17	**Hiring and promotion decisions**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) CoreCivic LAC policy 14-07-01 Sexual Abuse Prevention states "To the extent permitted by law, CoreCivic will decline to hire or promote anyone who may have contact with offenders, and decline to enlist the services of any contractor, who may have contact with offenders, who: a. 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); b. 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 c. Has been civilly or administratively adjudicated to have engaged in the activity as outlined above in B.1.b."

HR Interview – The LAC HR Manager said there are four required questions that are asked of all applicants. They are based on the requirements of 115.17 (a) and (b). These questions are asked of all applicants prior to interview on the Self-Declaration of Sexual Abuse/Sexual Harassment form and again on the date of hire.

Document Review – The Self-Declaration form was requested for review on ten new staff. All staff reviewed had answered the questions and forms were completed before their hire date.

b) CoreCivic LAC Policy 14-07-01 Sexual Abuse Prevention states “Any incident of sexual abuse and/or sexual harassment shall be considered in determining whether to hire or promote any individual, or to enlist the services of any contractor, who may have contact with offenders.”

HR Interview – The HR Manager said the fourth question asked of applicants is “Has a substantiated allegation of sexual harassment been made against you.” This is on the Self-Declaration form that is completed by applicants prior to an offer of hire.

Document Review – The question regarding substantiated sexual harassment was observed on Self-Declaration forms on ten new staff records reviewed.

c) CoreCivic LAC Policy 14-07-01 Sexual Abuse Prevention states “Before hiring new employees who may have contact with offenders, CoreCivic shall: Perform a criminal background records check; Consistent with federal, state, and local law make its best effort 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 as defined by this policy. The 3-20-2B PREA Questionnaire for Prior Institutional Employers form shall be used to solicit such prior employment information.”

HR Interview – The HR Manager said a criminal background check is completed on all staff prior to hiring them. The criminal background check is completed through the Kentucky DOC and First Advantage (a paid service). She also asks all applicants if they had prior institutional experience and sends a PREA Questionnaire for Prior Institutional Employer via fax and email to document it was sent. She said the form asks if the former employee had any substantiated investigations of sexual abuse or if they resigned during an investigation.

Document Review – Criminal background checks were requested for ten new staff for review. A letter from the KDOC stating the criminal background check was clear and a First Advantage report was provided for all ten new staff. The documents were dated prior to their hire date. The KDOC completes an NCIC (national) criminal background check and is not allowed to send the actual NCIC report per the rules of the NCIC. The letter from the KDOC comes from an HR Specialist at another KDOC facility that has an NCIC terminal to complete the criminal background check. The First Advantage check is a state or local criminal background check and the complete report is provided. The letters from the KDOC were not signed by the HR Specialist or completed by the person that completed the criminal background check. This is unacceptable evidence of the criminal background check being completed. If the

	actual report cannot be provided, then documentation that includes the name of the staff being reviewed, date completed, name and title of the staff completing the check and the results of the check, i.e. clear or not clear must be provided. d) CoreCivic LAC Policy 14-07-01 Sexual Abuse Prevention states “CoreCivic shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with offenders.” Document Review – The criminal background check completed at the start date was requested for eight contract staff. The facility provided the completed criminal background check for four contract staff that started working at LAC last year and for one veteran contract staff. The facility could not provide the criminal background check for three veteran contract staff that was completed prior to beginning work at LAC. This does not meet this provision’s requirement. e) CoreCivic LAC Policy 14-07-01 Sexual Abuse Prevention states “CoreCivic shall conduct criminal background records checks at least every five (5) years of current employees and unescorted contractors who may have contact with offenders or have in place a system for otherwise capturing such information.” HR Interview – The HR Manager said she requests a criminal background check on all current staff and contractors from KDOC every 5 years. Document Review – Six veteran staff and four veteran contract staff criminal background checks were reviewed. Emails were provided for all six veteran staff and the four veteran contract staff from someone at another KDOC facility that said the criminal background check was clear. Some emails had the name of the staff the criminal background check was completed on. Some emails did not provide the name of the staff. The emails are not acceptable evidence that a criminal background check was completed. f-g) CoreCivic LAC Policy 14-07-01 Sexual Abuse Prevention states “The 14-7-1H Self-Declaration of Sexual Abuse/Sexual Harassment form shall be completed by current employees on an annual basis to serve as verification of an employee's fulfillment of his/her continuing affirmative duty to disclose any sexual misconduct as described in this policy, and as outlined above.” Document Review –The six veteran staff selected had completed a Self-Declaration of Sexual Abuse/Sexual Harassment form in 2024 and 2025. The forms asked the questions required in substandard a and b. The forms also included a statement regarding an affirmative duty to disclose any sexual misconduct and informs the employee providing false information and/or omitting information about misconduct is grounds for termination. h) CoreCivic LAC Policy 14-07-01 Sexual Abuse Prevention states “Unless prohibited by law, CoreCivic shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.”

	HR Director Interview – The HR Director said she asks all applicants if they have had prior institutional work experience. If they have prior corrections work, she completes a PREA Reference Check form and faxes it to the former institutional employer. Corrective Action Required: The letters and emails from HR staff at the KDOC are not acceptable evidence that a criminal background check has been completed. If the original reports cannot be provided due to NCIC rules, it was suggested the facility develop a form for the KDOC staff that perform the criminal background check to complete and sign that includes the name/title of the staff completing the criminal background check, the date completed and the results of the background check. Documentation for criminal background checks completed for new staff, contract staff and all 5 year criminal background checks for veteran staff and contract staff after the new document is implemented will be reviewed for the new practice during the corrective action period. **Corrective Action Completed:** A new form to document criminal background check completion was developed by CoreCivic and approved by Kentucky DOC. There were no new contract staff and no 5 year criminal background checks completed during the corrective action period. The form provides the name of the applicant, the type of criminal background check completed, the results of the criminal background check, the title and name of who completed the check. Ten criminal background checks for staff hired during the review period were provided to verify use of the new form. CoreCivic is ultimately responsible for ensuring all staff and contract staff have a full criminal background check that is properly reviewed convictions or arrests that might prevent contact with inmates. It is recommended that CoreCivic consider having criminal background checks completed through a different source that can provide the LAC Warden with the full criminal background check to be reviewed and cleared by LAC staff. CoreCivic and LAC should have more control of criminal background checks to ensure it meets the standard at all times.

115.18	**Upgrades to facilities and technologies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) CoreCivic LAC Policy 14-07-01 Sexual Abuse Prevention states "When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, CoreCivic will consider the effect of the design, acquisition, expansion, or modification on the company's ability to protect offenders from sexual abuse. Such considerations shall be documented on form 7-1B PREA Physical Plant Considerations." The facility reported on the Pre-Audit Questionnaire there were no new buildings or modifications of existing buildings during the review period. Warden Interview – the Warden said there have been no new expansions of

	modifications completed during the review period. He said if there were plans for expansion or modification, the PCM would be involved in the planning to ensure prevention of sexual abuse is considered in the plan. Agency Head Designee Interview – The Vice President said the design staff consult with the PREA Coordinator for any new builds or renovations to ensure compliance with the PREA standards. The PREA Coordinator is involved in acquisition of facilities to review the site for cross gender viewing issues or blinds. b) CoreCivic LAC Policy 14-07-01 Sexual Abuse Prevention states “When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, CoreCivic will consider how such technology may enhance the ability to protect offenders from sexual abuse. Such considerations shall be documented on form 7-1B PREA Physical Plant Considerations.” Agency Head Designee Interview – The Vice President said cameras are used to support direct and indirect supervision of inmates. Cross gender viewing is also considered in camera placement. Video technology is discussed in the annual staffing plan review with the PREA Coordinator. Warden Interview – The Warden said there have been no new cameras or modifications to the video monitoring systems in since the last audit. He said if there were plans for expansion or modification of the camera system, the PCM would be involved in the planning to ensure prevention of sexual abuse is considered. Based on the information from interviews and policies, it has been determined the facility meets the provisions of the standard.

115.21	**Evidence protocol and forensic medical examinations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) Core Civic LAC policy 14-07-01 states “If the abuse occurred within a time period that still allows for the collection of physical evidence, the alleged victim shall be instructed not to take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; The time frame for collection of physical evidence outlined above in L.5. and L.6. is generally ninety-six to one-hundred-twenty (96-120) hours, however, facility staff shall consult with investigators at the time of incident notification to determine local protocol and the time frame applicable for each individual incident.” KDOC policy 14.7 Sexual Abuse Prevention states " If the incident occurred within the previous ninety-six (96) hours, the alleged victim and alleged perpetrator shall not take any actions that could destroy physical evidence which includes:

	washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating." Staff Interviews – All staff interviewed could describe how to protect possible DNA evidence at both the incident scene and on the inmate victim or perpetrator. Staff said the scene should be closed off to prevent other staff or residents from contaminating DNA evidence. Staff said the victim would be instructed to not eat, drink, brush teeth, change clothes, shower, or use the toilet until evidence could be collected at the local hospital. The alleged perpetrator would be prevented from destroying evidence by staff in the same manner as the victim. c) KDOC policy 14.7 Sexual Abuse Prevention states " The Medical Department shall promptly make arrangements for the alleged victim to be transported to an outside facility for an examination that may include: collection of forensic evidence, testing for sexually transmitted diseases, prophylactic treatment, follow-up and mental health assessment." Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states "All victims of sexual abuse shall have access to forensic medical examinations, whether onsite or at an outside facility, without financial cost, where the exam is necessary to obtain evidence or is medically appropriate, The examination shall be performed by a Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE). If a SAFE or SANE provider is not available, the examination may be performed by other qualified medical practitioners." Forensic Exam – An inmate that made a report of sexual abuse was sent to the hospital for a forensic exam during the review period. The inmate was interviewed as a targeted interview. The victim said he was not charged for the forensic exam. He said he was seen by mental health within a few days of making a report. Medical Staff Interview – The Medical Services Director said if an inmate reports a sexual assault, the medical staff will treat for emergent injuries and then arrange for a forensic exam when applicable. Forensic exams are offered through Marcum and Wallace Hospital in Irvine, KY or University of Kentucky Hospital in Lexington. Victim Advocate Interview – The Director for the Rising Center said they would send a victim advocate to meet the inmate victim at the Marcum and Wallace Hospital or go to Lexington to the U of Kentucky Hospital to provide services at the forensic examination if requested. d-e) KDOC policy 14.7 Sexual Abuse Prevention states "The alleged victim shall be offered victim advocate services. If requested, the advocate service shall be contacted and given the appropriate information in order to assist the victim through the forensic examination and investigation process." Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states "As requested by the victim, either the victim advocate, a qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and

	shall provide emotional support, crisis intervention, information, and referrals." LAC reported on the PAQ that qualified staff would not be used. Only a victim advocate through the KASAP and Rising Center is available. A Memorandum of Understanding with the Kentucky Association of Sexual Assault Programs was provided for review. The scope of services KASAP agrees to provide confidential emotional support services to victims of sexual abuse in the Kentucky Department of Correction which includes the Lee Adjustment Center. This can include VA services at the forensic exam, during investigative interviews and in person visits with the victim. The contract is effective until June 30, 2026. Victim Advocate Interview – The 800 number provided to LAC inmates was called. The call goes to the KRCC Crisis Center. The staff that answered said they gather the information from the inmate and forward it to the Rising Center. The Rising Center will then contact the facility to request a telephone conversation with the victim. This auditor called the number for the Rising Center and spoke to the Director. She said the Rising Center would provide victim advocate services to inmates at the Marcum and Wallace Hospital and U of Kentucky Hospital and also at the facility for investigator interviews. Facility Investigator Interview – the facility investigator said victims of alleged sexual abuse are asked if they want a victim advocate prior to their interview. Document Review – There was no documentation of the victim being offered victim advocate services at the investigatory interview in the sixteen sexual abuse investigations. The facility had documentation of a victim advocate being offered at the hospital prior to forensic examinations. The facility must document the offer of services and if the inmate victim declined or accepted. If the inmate victim wants a victim advocate present during the interview by the Facility Investigator, how the victim advocate services are provided must be documented. Tour Observations – Posters were seen in inmate housing areas that provided information for the Rising Center victim advocate organization. The 800 phone number was on the posters. Inmates can call the number collect or ask staff to call the number for them in an office. f) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states "Criminal Investigations into allegations of Sexual Abuse will be conducted by the Kentucky State Police in accordance with the Code of Federal Regulations, Title 28, Part 115.21, Evidence Protocol and Forensic Medical Examinations. The investigating agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions." LAC provided a letter from the Kentucky State Police Academy Commander to the KDOC Commissioner that states all KSP Troopers receive training in sexual abuse evidence collection at crime scenes, to include in a confinement setting. The training also includes the criteria and evidence to substantiate a case for prosecution. This letter did not document that the Kentucky State Police were made aware of the requirement for KSP investigators to follow provisions (a) through (e) of this standard.

	The LAC PCM/Assistant Warden sent an email to the KSP Post Commander to inform him the KSP investigators must follow the evidence protocols in provisions (a) through (e) when conducting investigations of sexual abuse at LAC. The email contained standard 115.21 and 115.71 and was provided to this auditor. The facility contacted the Kentucky State Police in sixteen cases of sexual abuse during the review period for potential criminal violations. In three cases, the KSP determined the time frame since the sexual abuse was reported to have occurred allowed for the collection of physical evidence and directed the facility to send the inmate to the hospital for a forensic exam. Corrective Action Required: There was no documentation of the victim being offered victim advocate services at the investigatory interview in the sixteen sexual abuse investigations. The facility must document the offer of services and if the inmate victim declined or accepted. If the inmate victim wants a victim advocate present during the interview by the Facility Investigator, how the victim advocate services are provided must be documented. The PCM/AW provided a directive to offer a victim advocate prior to investigative interviews to all staff trained to conduct administrative investigations. Sexual abuse investigations will be reviewed for compliance. **Corrective Action Completed:** The CoreCivic PREA Coordinator provided refresher training to the LAC executive staff and facility investigator during the post-audit period via email that instructed the investigator to inform victims of sexual abuse they can have a victim advocate present during investigatory interviews and to document if the victim chooses to have an advocate or declines. A completed sexual abuse investigation was provided that documented the victim was offered a victim advocate and declined the offer at the interview by the investigator. Based on information from corrective actions, interviews, policies, and documents reviewed, it has been determined the facility meets the provisions of the standard.

115.22	**Policies to ensure referrals of allegations for investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC policy 14.7 Sexual Abuse Prevention states "All allegations of sexual abuse and sexual harassment shall be promptly, thoroughly and objectively investigated, including third-party and anonymous reports." CoreCivic LAC policy 14-07-01 Sexual Abuse Prevention states "The Warden shall ensure that an administrative investigation and a referral for a criminal investigation, where appropriate, are completed for all allegations of sexual abuse and sexual harassment." Agency Head Designee Interview – The Vice President said all reports of sexual abuse

	that appear to be criminal are referred to an agency with the authority to conduct those investigations. CoreCivic investigators will conduct administrative investigations. The CoreCivic investigator will work with the outside agency as requested. Document Review – Seventeen investigations were reviewed. One was an allegation of sexual harassment and sixteen were allegations of sexual abuse. The sixteen sexual abuse allegations were referred to the Kentucky State Police for investigation of possible criminal violations. Administrative investigations were completed by LAC Facility Investigators for all seventeen reports. b-c) KDOC policy 14.7 Sexual Abuse Prevention states “A PREA investigation shall be initiated within twenty-four (24) hours of the incident upon report to the facility or agency investigator or as soon as possible if referred for investigation to the Kentucky State Police (KSP).” Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “Criminal Investigations into allegations of Sexual Abuse will be conducted by the Kentucky State Police in accordance with the Code of Federal Regulations, Title 28, Part 115.21, Evidence Protocol and Forensic Medical Examinations.” The KDOC Website has KDOC 14.7 Sexual Abuse Prevention policy that contains a section that requires allegations of sexual abuse and sexual harassment be referred for investigation to either the Facility Investigators or the Kentucky State Police. The LAC 14-07-01 Sexual Abuse Prevention policy is not posted on either the KDOC or CoreCivic Lee Adjustment Center websites. Investigator Interview – The Facility Investigator said designated facility investigators conduct all administrative investigations of sexual abuse and sexual harassment. All reports of sexual abuse are referred to the Kentucky State Police for investigation. Referrals to the KSP are documented in the administrative investigation report. He said he will contact the KSP Trooper that is assigned the case for updates on the status of the investigation. He said KSP does not provide the investigation reports to the facility. Recommendation: Though the LAC 14-07-01 and KDOC 14.7 Sexual Abuse Prevention policies mention KSP as being responsible for criminal investigations, they lack detail in describing the responsibilities of KSP and LAC in conducting criminal investigations. The CoreCivic agency policy 14-2 Sexual Abuse Prevention and Response describes the responsibilities of outside investigation agencies in relation to standard 115.21, 22, 71 and should be used as the blueprint for KDOC and LAC. Though CoreCivic policy 14-2 is the agency wide policy for CoreCivic, it is not applicable to Lee Adjustment Center. It is recommended that section O of CoreCivic policy 14-2 be written into the LAC 14-07-01 policy. Based on the information from interviews, policies and documents reviewed, it has been determined the facility has demonstrated substantial compliance with the provisions of the standard.

115.31	Employee training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy requires all staff to complete training annually that covers all ten components of the standard. The CoreCivic LAC 14-07-01 policy states “All CoreCivic facility employees shall receive training on the CoreCivic and Kentucky Department of Corrections zero-tolerance policy for sexual abuse and sexual harassment.” PREA Training Curriculum – The KDOC PREA training curriculum was provided for review. The nine topics required in the standard were covered in the training. The training covers zero-tolerance, rights of inmates and staff, dynamics of abuse, avoiding inappropriate relationships, signs of sexual abuse, victim reactions, and response to reports. Training Records Review – The training records for ten new staff were requested and reviewed. All six staff completed the KDOC PREA training shortly after being hired. b) CoreCivic LAC policy 14-07-01 Sexual Abuse Prevention states “In addition to the general training provided to all employees, all full and part-time Employees transferring to a facility that houses a population whose gender is different from their previously assigned facility shall receive additional training specific to the population of the newly assigned facility.” c) CoreCivic LAC policy 14-07-01 Sexual Abuse Prevention requires staff to complete the KDOC PREA training annually. The annual training covers the refresher information requirement in the standard. However, refresher information is provided in staff brochures, posters throughout the facility and quick reference cards are given to all staff with information about first responder duties. d) CoreCivic LAC policy 14-07-01 states “Employees shall be required to confirm, by either electronic or manual signature, their understanding of the received training via the CoreCivic 14-7-1A PREA Policy and Training Acknowledgement Form and the Kentucky Department of Corrections PREA Acknowledgement Form. Signed documentation will be maintained in the employee's training file.” Document Review – A PREA Training Acknowledgement form is signed by staff when they complete the PREA training. The form has a statement about receiving and understanding the training they received. The staff agree to statement by signing the form. Training Documents – Training documentation for six veteran staff selected were provided for review. All six had completed the training annually in the last two years. This exceeds the standard of bi-annual training for staff. Staff Interviews - Twelve random staff interviewed said the training covered zero-tolerance policy; rights of residents and staff; dynamics of sexual abuse; signs and

	reactions of sexual abuse victims; how to avoid inappropriate relationships with residents; how to respond to a report of sexual abuse; how to protect evidence; mandatory reporting. Staff demonstrated a thorough knowledge of all topics and could clearly describe their responsibilities in response to a report of sexual abuse or sexual harassment. All staff hired in the last year said they had completed the training prior to working around inmates when they were hired at LAC. All veteran staff said they have completed the training annually. Based on the information from interviews, policies and documents reviewed, it has been determined the facility exceeds the provisions of the standard.

115.32	**Volunteer and contractor training**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states “As required by 28 C.F.R. § 115.32, all Volunteers and Contractors who have contact with offenders shall be trained annually on the following: The Department’s policy of zero-tolerance regarding sexual abuse and sexual harassment and how to report such incidents. Their responsibilities under the department’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Training shall be based on the level and amount of contact the Volunteer or Contractor has with offenders.” CoreCivic LAC policy 14-07-01 states “All civilians/volunteers/contractors who have contact with offenders on a recurring basis shall receive training on their responsibilities pertaining to sexual abuse and sexual harassment prevention, detection, reporting, and response as outlined in this policy.” Volunteer Interview – A volunteer said he was provided the zero-tolerance of sexual abuse and sexual harassment policy. He said he receives the training annually in a virtual format. The Chaplain goes over the training with him as well. When he completed the training, he signed an acknowledgement form. If he received a report from an inmate, he would immediately tell a security officer. He said he could not tell anyone else about the information from the report as it is confidential. Contract staff Interview – A Food Service contract staff was interviewed. He could describe an appropriate definition of zero tolerance. He said he would contact his immediate supervisor and the shift supervisor if an inmate were to report an incident of sexual abuse or sexual harassment or if they had a suspicion that an inmate was a victim of sexual abuse. He knew how to protect evidence and said he was required to write an incident report. b) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “The level and type of training provided to civilians/volunteers/contractors shall be based on the services they provide and level of contact they have with offenders. All civilians/

	volunteers/contractors who have contact with offenders shall be notified of the CoreCivic zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.” c) Volunteer and Contractor Training Records – Eight contract staff and six volunteers were randomly selected for training record review. All eight contract staff had completed the PREA training when they started at LAC. Four of the eight have been working at LAC for more than two years and completed the PREA training again in the last year. All six volunteers completed the PREA training when they started as volunteers at LAC. Based on the information provided from interviews, polices and documents reviewed, it has been determined the facility meets the standard.

115.33	**Inmate education**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-b) KDOC 14.7 Sexual Abuse Prevention policy states “During orientation at the Assessment and Classification Center and at each institution, an offender shall receive oral and written information about the department’s zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.” Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “Upon arrival at the facility, all offenders shall be provided with written information regarding sexual abuse prevention and reporting (e.g. offender handbook, CoreCivic 14-7-1AA Preventing Sexual Abuse brochure, etc.).” PREA Education Staff Interview – A Case Manager that provides inmates with a comprehensive PREA education when they arrive at the facility said he shows the PREA education video from the PRC to inmates in a group then goes over the inmate handbook and PREA brochure with them individually. He determines if the inmates have a disability or are LEP and provides accommodation based on the disability. A telephonic translator service is available for use if needed for LEP inmates or ASL for hearing impaired inmates. The PREA brochure is available in Spanish or braille. He said the facility can provide TTY or Captel equipment for hearing impaired as well. He asks each inmate if they have any questions after going over the brochure with them. He has the inmate sign a document indicating they received the education. He said he provides information about the external reporting to the Kentucky Justice Department and Rising Sun victim advocate organization. He also points out the posters that have the information for calling the PREA hotline or KJC in all housing units. Inmate Interviews – All inmates said they were provided the PREA reporting

	information and zero-tolerance policy the same day they arrived or during the first week. All inmates knew there was a policy of zero-tolerance of sexual abuse and sexual harassment. All inmates could remember more than one way to make a report of sexual abuse or sexual harassment. All Inmates said they see the posters in the facility with information about phone numbers they can call. Some inmates said they didn't think they needed the information, so they didn't pay attention. d) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states "In the event an offender has difficulty understanding provided information and/or procedures outlined in this policy, employees must ensure that such information is effectively communicated orally to such offenders on an individual basis. Auxiliary aids that are reasonable, effective, and appropriate to the needs of the offender shall be provided when simple written or oral communication is not effective." Document Review – some inmate PREA education materials are translated to Spanish. The PREA brochure, Inmate Handbook and posters are provided in Spanish. Inmate Interview – one inmate interviewed was not LEP, but said the Case Manager provided the materials to him in Spanish. e) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states "The facility shall maintain documentation of offender participation in educational sessions pertaining to sexual abuse and sexual harassment." Document Review - The PREA Brochure Acknowledgement and Orientation Completion Acknowledgement forms were reviewed for thirty inmates. Twenty-eight completed the comprehensive PREA education either the same day of arrival or within the next day or two. Two were completed several months after they had arrived. f) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states "In addition to providing such education, the facility shall ensure that key information is continuously and readily available or visible to offenders through posters, offender handbooks, or other written formats." The PREA Brochure and Inmate Handbook are given to all inmates. The Inmate Handbook has a section called Sexual Abuse Prevention & Intervention on page 2. This section provides specific instructions for inmates to report sexual abuse and sexual harassment. All inmates acknowledged receiving one when they arrived during interviews. The facility has PREA posters with information on reporting sexual abuse or sexual harassment and posters providing information about victim advocate services posted throughout the facility that this auditor observed during the tour. Based on the information from interviews, policies and documents reviewed, it has been determined the facility has demonstrated substantial compliance with the provisions of this standard.

115.34	**Specialized training: Investigations**

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-b) KDOC 14.7 Sexual Abuse Prevention policy states "All employees who conduct sexual abuse investigations shall receive specialized training in conducting such an investigation in a confinement setting. The training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecution referral." KDOC Specialized Investigations Training Curriculum – the investigations training curriculum was reviewed. The training included Miranda and Garrity warnings, Interviewing victims and suspects, report writing, first responders and evidence collection, investigation outcomes and prosecution referrals. Investigator Interview – The Facility Investigator said the specialized investigation training covered evidence collection, interviewing victims, report writing, what it takes to substantiate a case or refer for prosecution, and Miranda and Garrity warnings. He completed the training when he was an investigator for the Kentucky DOC. He said he completed it again after being hired by CoreCivic. c) Training Certificates & Training Records were provided for every employee designated as a facility investigator. All staff that were involved in investigations in the last twelve months have completed the training. Based on the information provided from interviews, polices and documents reviewed, it has been determined the facility meets the standard.

115.35	**Specialized training: Medical and mental health care**
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	a-b) KDOC 14.7 Sexual Abuse Prevention policy states "All full and part-time medical and mental health care practitioners who work regularly in the facility shall receive specialized training on the following: a. How to detect and assess signs of sexual abuse and sexual harassment. b. How to preserve physical evidence of sexual abuse. c. How to respond effectively and professionally to victims of sexual abuse and sexual harassment. d. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment."

	The policy reflects the requirements of this provision. Medical Staff Interview – The Health Care Director said the medical staff get the specialized medical training annually. She said the training covers how to detect signs of sexual abuse, how to protect evidence, how to respond to victims of sexual abuse, and what to do if she gets a report. She said the medical staff do not conduct forensic exams at the facility. She would arrange for a forensic exam at a hospital. Mental Health Staff Interview – The Mental health staff said she has completed the specialized medical training and PREA training annually since working at LAC. The training covers how to detect signs of sexual abuse, how to protect evidence, how to respond to victims of sexual abuse, and what to do if she gets a report. c) Specialized medical training completion documentation was provided for four contract medical staff. Two medical staff completed the specialized training during 2025 when they started work at LAC. Three medical staff completed the training annually since 2020. d) PREA training acknowledgements were reviewed for four medical staff. All training was completed in the last year and when they started working at LAC. Based on the information from interviews, policies and documents reviewed, it has been determined the facility exceeds the requirements of the standard by requiring the medical and mental health staff to complete the specialized medical training and PREA training annually.

115.41	**Screening for risk of victimization and abusiveness**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-b) KDOC 14.7 Sexual Abuse Prevention policy states “An offender shall be assessed during intake screening within seventy-two (72) hours of arrival at the Assessment and Classification Center and upon each transfer to another facility. Each objective risk screening shall include a review of any history of sexual abuse-victimization or sexually predatory behavior. The assessment report shall be completed in the Kentucky Offender Management System (KOMS).” Risk Screening Staff Interview – A Case Manager was interviewed that completed risk assessments on inmates at intake. He said he meets with each inmate on the day of arrival or the next day to conduct an interview to gather information from the inmate for completing the assessment. He reads the questions from the assessment form and documents the answers. He said he also reviews the inmate record for information on prior convictions and conduct. Inmate Interviews – Inmates said they could recall being asked questions about being

	a prior victim of sexual abuse, prior criminal history, violent or sexual conduct, disabilities, and if they felt vulnerable to sexual abuse in a private meeting with the Case Manager the same day or the day after they arrived. Some inmates couldn't remember all the questions they were asked but did recall being asked if they were ever a prior victim of sexual abuse. c-d) KDOC 14.7 Sexual Abuse Prevention policy states "The intake screening shall consider, at a minimum, the following criteria to assess an inmate for risk of sexual victimization: a. Whether the offender has a mental, physical, or developmental disability; b. The age of the offender; c. The physical build of the offender; d. Whether the offender has previously been incarcerated; e. Whether the offender's criminal history is exclusively nonviolent; f. Whether the offender has prior convictions for sex offenses against an adult or child; g. Whether the offender is or is perceived to be lesbian, gay, bisexual, transgender, intersex, or gender nonconforming; h. Whether the offender has previously experienced sexual victimization; and i. The offender's own perception of vulnerability." The policy requires the risk assessment to cover all factors in this provision. The KDOC PREA Risk Assessment form Risk of Sexual Victimization section has questions about prior victimization during incarceration or in the community; mental, physical, or developmental disabilities; age; physical build; prior convictions for sex offense against a child or adult, first incarceration, non-violent convictions only; LGBTI or gender non-conforming; and feelings of vulnerability. Risk Screening Staff interview – The Case Manager interviewed was asked to describe the factors considered for the risk of victimization. He said there are questions about prior victimization, sexual orientation and gender identity, prior sex offense convictions, age, physical build, and vulnerability. e) KDOC 14.7 Sexual Abuse Prevention policy states "The intake screening shall consider, at a minimum, the following criteria to assess an offender for risk of being sexually abusive: a. Prior acts of sexual abuse, b. Prior convictions for violent offenses, and

	c. History of prior institutional violence or sexual abuse, as known to the Department of Corrections." The policy requires the risk screening to assess for the factors required in this provision. The KDOC PREA Risk Assessment instrument was reviewed and found to have questions regarding prior perpetration of sexual abuse, institutional conduct violations for sexual conduct and violence, and prior sex offense or violent offense convictions for determining the potential for abuse. Risk Screening Staff Interview – The Case Manager interviewed was asked what factors are considered for determining if inmates are potential abusers. She said the risk screening has questions about prior perpetration; sex offense convictions; convictions for violent offenses; conduct for sexually inappropriate behavior and violence to determine if an inmate is a potential abuser. Risk Screening Instrument – The PREA Risk Assessment instrument was reviewed for thirty inmates randomly selected from the intake list for the last 12 months. Inmates were selected from each month of the 12 to provide a review of practice over the year. Thirty PREA Risk Assessments were completed within 72 hours of arrival at the facility. f) KDOC 14.7 Sexual Abuse Prevention policy states "Within 30 days of arrival to each facility, the offender's risk level shall be reassessed based upon any additional information received since the intake screening." "Reassessments shall include consultation with the inmate." This review is documented in KOMS as classification notes. Another PREA Risk Assessment is only completed when new information changes the outcome of the intake assessment. Risk Screening Staff Interview – The Case Manager interviewed said the Case Managers meet with inmates again prior to 30 days to ask follow up questions about prior victimization, disabilities and if the inmate feels vulnerable to sexual abuse since being at LAC as part of the assessment review. Inmate Interview – Most inmates said they could recall staff asking the questions again a second time around a month later. Some did not recall or thought it was months later. Risk Screening Re-assessment – A review of the PREA Re-assessments for thirty inmates was reviewed. The PREA Re-assessment is a review of the re-assessment or review of the intake assessment. The review consisted of case notes for each inmate that usually had a note that said 30-day review, no changes. There was no indication that the inmate was asked re-affirming questions to determine if there had been any change. Twenty-four re-assessments were completed within 30 days of the inmate's arrival. Six were completed past 30 days of arrival. One was not due at the time of the review. Four of the six late re-assessments were completed on the same day of arrival in the next month but did not take into account a 31 day month of arrival, making it one day late. These also occurred in the first half of the review period. The

	most recent re-assessments were completed within 30 days. A new sample of thirty assessments completed for inmates arriving after the audit review period during February, March and April was reviewed. The sample was randomly selected from the list of inmates arriving from February 11 to April 9, 2026. All thirty inmates selected had a 30-day reassessment completed within the 30 day time frame required by the standard. Recommendation – It is recommended that the facility document in the case notes what questions were asked of the inmate at the 30-day review. g) KDOC 14.7 Sexual Abuse Prevention policy states "A reassessment shall also occur when any new information is learned that bears on an offender's propensity for sexual victimization or abusiveness, such as an incident or new disclosure of sexual abuse." Document Review – A sexual abuse investigation had a substantiated outcome. A new PREA Risk Assessment was completed for the inmate victim and inmate perpetrator. Risk Screening Staff Interview - The Case Manager said he would do a new risk assessment if there was an event or information that would change the prior assessment information, like a substantiated PREA incident. h) KDOC 14.7 Sexual Abuse Prevention policy states "Offenders shall not be disciplined for refusal or nondisclosure of complete information in response to questions 1, 7, 8 or 9 asked in the risk assessment." Risk Screening Staff Interview – The Case Manager said inmates do not have to answer questions they are asked during the risk screening process and cannot be disciplined for refusing. The assessment would be completed based on the inmate record. i) KDOC 14.7 Sexual Abuse Prevention policy states "The dissemination of information related to and resulting from the assessment shall be controlled and limited to staff necessary to inform treatment plans and make security and management decisions regarding housing, beds, work, education and program assignments." Risk Screening Staff Interview – The Case Manager that performs risk screenings was asked if the information from the screening can be shared with other staff. He said only authorized staff are allowed to access the information because it is confidential. PREA Coordinator Interview – The PREA Coordinator said access to the 14-2B and partner agency risk assessments are secured in the inmate's files in record offices where access is limited to only those who need access such as Case Managers, and treatment personnel. The assessments on computers are protected by passwords and are not accessible by all staff. PREA Compliance Manager Interview – The PCM/AW said access to information from the risk assessments is limited to Case Managers, Unit Managers and other executive

	staff. Access to the assessment in KOMS must be granted. The policy reflects the provisions of the standard. The PREA Risk Assessment assessed the factors required by the standard. The intake assessments were being completed within the required time frame. However, during part of the review period the 30-day reassessments were being completed a day past the 30-day requirement due to thirty-one days in the month of the intake assessment being completed. A new sample was selected and found to meet the standard. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.

115.42	**Use of screening information**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	KDOC 14.7 Sexual Abuse Prevention policy states "The information gleaned from the intake screening shall be used to make housing, bed, program and work assignment decisions with the goal of keeping separate those offenders who are prone to sexual victimization from those who are prone to sexual aggression." PCM Interview – The PCM said when bed moves are completed, KOMS will alert staff if an inmate designated at high risk of victimization is being placed in a cell or bed location with an inmate designated high risk for perpetration of sexual abuse. Inmates that are high risk of victimization are not placed in the same cell or bunk area with an inmate that is a high risk of being an abuser. The Unit Team staff review the bed assignments weekly to ensure the placement is correct. Screening Staff Interview – A Case Manager that completes risk screenings said the results are used when placing inmates in bed assignments and program assignments. Inmates at high risk of victimization are not placed in the same cell or bunk area with inmates that are at a high risk of being abusive. He said the bed rosters are reviewed weekly to ensure these inmates are not housed together. Based on the information from interviews and policies reviewed, it has been determined the facility meets this standard.

115.43	**Protective Custody**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states "Victims of sexual abuse or

	those at high risk for abuse shall not be placed in involuntary protective custody or segregation unless all available alternatives have been assessed and documented and are not available. The facility may only hold the offender for twenty –four (24) hours in involuntary segregation while completing the assessment, and if the placement has to continue, must document why there are no other available alternatives and provide access to programs, education, work and other privileges to the extent possible.” Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “Offenders 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 offender in involuntary segregated housing for less than twenty-four (24) hours while completing the assessment.” The facility reported on the Pre-Audit Questionnaire no inmates at risk of sexual victimization being placed in segregation during the review period. Warden Interview – The Warden said if the staff that complete the risk assessment at intake feel an inmate might be at extremely high of a risk of victimization in general population, the Unit Manager will look for alternative open population housing placement that is safe as the priority. Use of restrictive housing would be a last resort. If an inmate is only safe in restrictive housing, a transfer would be requested. He said placement in segregation is reviewed in 24 hours and approved by him. He has not had to place an inmate in segregation that was high risk of victimization during the review period. b) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “Offenders placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If access to programs, privileges, education, or work opportunities is restricted, the facility shall document the following: The opportunities that have been limited; The duration of the limitation; and The reasons for such limitations” Staff that Supervise Segregation Interview – A Unit Manager said inmates in segregation are restricted have limited work opportunities and can access some programs through the tablet or education staff can visit them in RHU. c) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “Segregated housing shall be used only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of thirty (30) days.” The facility reported on the PAQ no inmates at risk of sexual victimization were placed in segregation for more than 30 days during the review period. Warden Interview – The Warden said an inmate has not been involuntarily placed in restrictive housing based on a high risk of victimization assessment in the last year.

Staff will look at all alternatives in housing prior to placing an inmate involuntarily in restrictive housing. An inmate’s placement in restrictive housing is reviewed weekly. The goal is to place them back in population when it is safe to do so. He said if they cannot place the inmate back in general population, a request to transfer the inmate to another facility will be made.

Staff that Supervise Segregated Housing – A Unit Manager that supervises the RHU was interviewed. She said that inmates involuntarily placed in restrictive housing due to high risk for sexual victimization would still have some access to education or other program materials through workbooks or tablets. Restrictions to privileges and programs would be documented in classification reviews. A review of placement in restrictive housing is conducted within 24 hours and then every seven days. The goal is to get them removed from RHU as soon as it is safe to do so.

d) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “If involuntary segregated housing is warranted as outlined above in J.2.b., documentation of such action shall clearly specify: The basis for the facility’s concern for the offender safety; and The reason why no alternative means of separation can be arranged.”

e) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “Every thirty (30) days, a review of each offender status will be conducted to determine whether there is a continuing need for separation from the general population.”

Segregation Staff Interview – The segregation housing unit (RHU) supervisor was interviewed. He said there were no inmates placed involuntarily in segregation during the review period that were determined to be too vulnerable to sexual abuse in population. Restrictions to programs, privileges, education and work opportunities would be documented. A review of the placement is conducted every 30 days after the initial placement review.

Based on the information from interviews and policies reviewed, it has been determined the facility meets the provisions of the standard.

115.51 Inmate reporting

Auditor Overall Determination: Meets Standard

Auditor Discussion

a) KDOC 14.7 Sexual Abuse Prevention policy states “An offender may report a sexual offense to any staff member and may also report using any of the listed multiple internal and external reporting methods, whether verbally, in writing, anonymously or a via a third party.”

Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states “Offenders shall be encouraged to immediately report pressure, threats, or instances of sexual abuse or sexual harassment, as well as possible retaliation by other offenders or employees for

	reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents." LAC provides several ways for inmates to make a report. To make a report Inmates can: · Submitting a sick call request and/or reporting to a Health Services staff member during sick call; · Verbally telling any employee, including the Chaplain; · Forward a letter, sealed and marked "confidential", to the Warden, Investigator or management staff; · Forwarding a letter to: CoreCivic Managing Director, Facility Operations, 5501 Virginia Way, Brentwood, Tennessee 37027; · Calling the KDOC's PREA 24 hour reporting hotline by dialing *7732 from any inmate phone or having someone on the outside call the hotline 1-833-362-7732; or by · Calling the KDOC's third-party reporting option (Kentucky Justice Cabinet) by dialing *5532 from any inmate phone or having someone outside call the third party at 502-564-7554. All of these reporting methods are provided in the Inmate Handbook. Random Staff Interviews – Staff interviewed were aware of several ways that an inmate could privately report sexual abuse and sexual harassment and could provide inmates with this information. All staff said the inmate could come to any staff to make a verbal report, write staff, tell family, or call a number on the offender phones. Inmate Interviews – Inmates were asked what ways they were aware of to report sexual abuse or sexual harassment. All knew they could call on the inmate phones to numbers they see on posters by the phones. All said they felt like they could go to any staff to make a verbal report. All knew they could write to staff. Most thought they could have their family contact the facility to make a report. Most were aware they could make an anonymous report on the phones by not providing their name. Some knew they could make a report through the tablets issued to them. Tour Observations – During the tour of the facility, PREA report posters were seen on the walls next to the phones or on the wall by the entrance in day rooms in every housing unit. The posters were large enough print and placed on the wall low enough that inmates would be able to read them. A test call was made from an inmate phone to the KDOC *7732. The PCM received the voicemail within 10 minutes and sent it to the auditor. Another call was placed to the Kentucky Justice Cabinet at *5532. An investigator answered the call and verified he was with the Kentucky Justice Cabinet. No pin number or inmate number was needed to make the call. This makes the call anonymous if the inmate does not provide their name. Most inmates knew this was a way to make an anonymous report.

	b) Core Civic LAC policy 14-07-01 states "Offenders may report sexual abuse or harassment by contacting the posted number for the external hotline to the Internal Investigations Branch of the Kentucky Justice and Public Safety Cabinet. This agency is not a part of Lee Adjustment Center, CoreCivic, or the Kentucky Department of Corrections. The offender may remain anonymous upon request." The policy requires the Kentucky Justice Cabinet to immediately forward the information to the The LAC Inmate Handbook provides information about how to report to an external entity, Kentucky Justice Cabinet, by dialing a number from the inmate phones or having someone on the outside call a phone number. PCM Interview – The PCM said external reports of sexual abuse and sexual harassment go to the Kentucky Justice Cabinet through the inmate phone system. Reports are immediately forwarded to him from the KJC. c) KDOC 14.7 Sexual Abuse Prevention policy states "Staff members shall immediately report all knowledge, suspicions or information of an incident of a sexual offense within a Kentucky or other correctional facility." Core Civic LAC policy 14-07-01 states "Employees must take all allegations of sexual abuse seriously, including verbal, anonymous, and third-party reports, and treat them as if the allegation is credible. Staff shall promptly document any verbal reports." The LAC Inmate Handbook provides information to inmates for reporting sexual abuse and sexual harassment to staff verbally, in writing, and through a third party. Inmate Interviews – All inmates knew they could to make a PREA report to any staff verbally or in writing. When asked how to make an anonymous report, most inmates thought they could put in a written note with no name and drop it in the mailboxes. Most were aware they could make an anonymous report on the phones by not providing their name. Information about anonymous reports was not found in the inmate handbook but was provided by staff at the PREA education. It is recommended that information about anonymous reports be added in the handbook. Random Staff Interviews – All staff said they are required to accept all verbal, anonymous and written reports of sexual abuse and sexual harassment from inmates and third parties like family or friends of inmates. d) KDOC 14.7 Sexual Abuse Prevention policy "Staff can privately report offender sexual abuse and sexual harassment directly to the warden or deputy warden of the facility, or by contacting the PREA hotline at the number posted in staff break areas." Core Civic LAC policy 14-07-01 states "Employees may privately report sexual abuse and sexual harassment of offenders by forwarding a letter, sealed and marked "confidential", to the Warden. CoreCivic employees may report PREA allegations involving staff on offender sexual abuse and harassment to the CoreCivic Ethics Line at 1-866-757-4448. This line is available 24 hours a day seven (7) days a week." Random Staff Interviews – All staff interviewed knew how to make a private report to their supervisor, the PCM, Warden or facility investigators. All staff knew there was a

	number they could call to make a private report as well. Investigation File Review – There were eight inmate verbal reports directly to staff and five inmate written reports to staff found in the review of seventeen investigations. Based on the information from interviews, tour observations, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.

115.52	**Exhaustion of administrative remedies**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	KDOC 14.6 Grievances policy states “Offenders who report sexual abuse via the offender grievance system shall have their report immediately forwarded to the Warden and it shall be assigned to a designated, trained investigator for a full investigation.” KDOC 14.7 Sexual Abuse Prevention policy states “Offenders who report sexual abuse via the offender grievance system shall have their report immediately forwarded to the warden and it shall be assigned to a designated trained investigator for a full investigation. The DOC does not have administrative procedures to address offender grievances regarding sexual abuse through the grievance system.” Though LAC and KDOC have a grievance policy and procedures, LAC claims exemption from this standard. FAQ July 2022 for 115.52 allows for an agency that has a grievance policy to claim exemption if the inmates are informed grievances reporting sexual abuse will not be processed through the grievance process and will be referred for investigation instead. A review of the Inmate Handbook page 14 found a notice to inmates stating grievances reporting sexual abuse would immediately be forwarded to the Facility Investigator and not be processed as a grievance. PCM Interview – The PCM said if an inmate files a grievance reporting sexual abuse, it will not be processed through the grievance procedures and referred for investigation to facility investigators. Intake Staff Interview – the Case Manager that provides the PREA education to inmates at intake said he informs the inmates that a grievance reporting sexual abuse would be immediately forwarded to the Facility Investigator and not processed was a grievance. One sexual abuse investigation reviewed was reported through a grievance and was immediately provided to the Facility Investigator for investigation. Based on the information from interviews, policies and documents reviewed, the facility has been determined to be exempt from this standard.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states "Offenders shall be provided access to outside victim advocates for emotional support services related to sexual abuse." "Such information shall also be included in the facility Offender Handbook. The facility shall enable reasonable communication between offenders and these organizations and agencies, in as confidential a manner as possible." The policy requires the information to be available through the offender handbook. Inmate Handbook – The LAC Inmate Handbook informs inmates they can get access to outside victim advocates that can provide confidential emotional support services for victims of sexual abuse. The handbook does not provide the contact information. Contact information is provided on posters were observed in all housing units next to the PREA reporting posters. Victim Advocate Handout – a brochure was provided for review that is given to inmates. It provides information about victim advocate services through the Rising Center. A toll free number was provided. Inmates can go to their Case Manager to call the number from the facility phones or call the number on the poster collect from the offender phone system. Tour Observations – During the facility tour, posters for the Rising Center were seen in housing unit next to the PREA posters. These posters provided information to inmates about services for victims of sexual assault. There were toll free phone numbers provided as well as the mailing address for the Rising Center. The signs were printed in bright colors and a print large enough for inmates to see at the level of posting. A test call was attempted from the offender phones. An 800 phone number had to be called collect. Staff on the tour told this auditor that the staff would call the number from an office for the inmate if they asked to call the victim advocate. Victim Advocate Interview – This auditor called the toll free number on the handout provided to the inmates. It went to an answering service KRCC. The person that answered said they would take down the name of the victim and location, then provide that to the Rising Center. This auditor called the number for the Rising Center and spoke to the Program Director. She said the Rising Center would provide victim advocate services to LAC inmates at the hospital. If the inmate had to go to Lexington, a Rising Center victim advocate will go the Lexington though it is outside of their region. Inmate Interviews – Most inmates were aware there was an outside organization that provided services to victims of sexual assault that they see on the posters. Some recalled being provided the information at intake by staff.

	Inmates that Reported Sexual Abuse Interviews – Two Inmates that reported sexual abuse said they offered a victim advocate either at the forensic exam or when the investigator interviewed them. One said the staff allowed him to call the victim advocate and for the victim advocate to come to the facility as well. b) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states "Offenders shall be informed, prior to giving them access, of the extent to which such communications shall be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws." Tour Observation – the Rising Center Posters inform inmates communications with the Rising Center are Confidential and privileged. This is printed on the bottom of the poster. PCM Interview - LAC does not have inmates detained solely for immigration detainers. All of their inmates are sentenced by a Kentucky Court. c) A copy of an MOU with the Kentucky Association of Sexual Assault Programs was provided for review. The MOU was effective until June 30 of 2024. The scope of services KASAP agrees to provide confidential emotional support services to victims of sexual abuse in the Kentucky Department of Correction which includes the Lee Adjustment Center. This can include VA services at the forensic exam, during investigative interviews and in person visits with the victim. The KASAP arranges services for LAC through the Rising Center. Lee Adjustment Center provides inmates with access to victim advocates by writing, a phone call through staff or collect call through the offender phone system. This information was not found in the inmate handbook. It is recommended the facility add this information to the inmate handbook, specifically the instructions for inmate's to make a collect call to the Rising Center. Based on the information from interviews, policies and documents reviewed, the facility has been determined to be exempt from this standard.

115.54	**Third-party reporting**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Kentucky DOC number for reporting sexual abuse and sexual harassment was found at https://corrections.ky.gov/About/Pages/Prison-Rape-Elimination-Act-(PREA).aspx and the number for CoreCivic was at https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea. Tour Observations – Posters were seen in housing units and in the visiting room with the KDOC phone number a third party could call to make a report of sexual abuse or

	sexual harassment. The inmates could provide friends or family with the number to make a report on their behalf. The posters were easy to read and not damaged. Inmate Handbook – The KDOC phone number for third party reports was published under Sexual Abuse Prevention and Intervention (PREA). The address for CoreCivic was provided for inmates or their family to send a written report to. Inmate Interviews – All inmates were aware there was a number either in the handbook or on posters they could provide to their family or friends to make a report on their behalf. Most inmates said they could report for another inmate as well. A test report was made to the KDOC phone number. The message was received and forwarded to this auditor. The KDOC staff on the tour notified this auditor of the message being received within 10 minutes of making the call. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the standard.

115.61	**Staff and agency reporting duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states “Staff members shall immediately report all knowledge, suspicions or information of an incident of a sexual offense within a Kentucky or other correctional facility. They shall also report any retaliation against someone who has reported such an incident and any knowledge of staff who neglect to report the above incidents or who, through neglect of duty or violation of responsibilities, may have contributed to an incident occurring.” Core Civic LAC policy 14-07-01 states All employees are required to immediately report: Any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in the facility in accordance with this policy, whether or not the area is under CoreCivic management authority; Retaliation against offenders or employees who have reported such an incident; and Any employee neglect or violation of responsibilities that may have contributed to an incident or retaliation. Random Staff Interview – All staff interviewed said staff must report any knowledge or suspicion of sexual abuse, sexual harassment or retaliation against a victim or witness, and staff failure to report an incident of sexual abuse or sexual harassment or retaliation. They all said the requirement was to report the information immediately. b) KDOC 14.7 Sexual Abuse Prevention policy states “All information in an intake screening, incident report or investigation of a sexual offense shall be kept

confidential except to the extent necessary to report to an appropriate supervisor, adequately investigate, provide treatment, or make security or management decisions."

Core Civic LAC policy 14-07-01 states "Apart from reporting to designated supervisors or officials, employees shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, and as specified in this policy, to make treatment, investigation, and other security and management decisions."

Random Staff Interviews – Staff were asked if they could share information the inmate reports to them with anyone? All staff said they could only share that information with their immediate supervisor, investigators, the PCM, Assistant Warden or Warden. Most said it is a need-to-know rule.

c) Core Civic LAC policy 14-07-01 states "At the initiation of providing medical care, both medical and mental health professionals will inform offenders of their professional duty to report and the limitations of confidentiality."

Medical Staff Interview – The Health Services Administrator said the inmates are informed of the Duty to Report incidents of sexual abuse that occurred in an institution to facility investigators. The medical staff also inform the inmate again when they see them for medical appointments. During the tour of the facility, this auditor had an informal conversation with another medical staff about the duty to report sexual abuse. The staff was aware of their duty to report and the requirement to inform the inmates.

Mental Health Staff interview – The mental health staff said she tells the inmates at the beginning of a session of her duty to report any information the inmate provides about an incident of sexual abuse that occurred in a correctional institution to the Facility Investigator.

d) PREA Coordinator Interview – There are no inmates under 18 at LAC. If the facility were to have a Vulnerable Adult victim of sexual abuse, a notification to law enforcement and the KDOC would trigger their notification to other state agencies as required.

Warden Interview – The Warden said if a report of sexual abuse is received from an inmate that is considered a vulnerable adult, they would contact the PREA Coordinator for CoreCivic and KDOC as well as the Adult Protective Services.

State Law Research – The state of Kentucky has a vulnerable adult statute KRS 209.020. The statute requires the facility to contact the Kentucky Department for Community Based Services/Adult Protective Services to report abuse of a vulnerable adult.

e) KDOC 14.7 Sexual Abuse Prevention policy states "Notifications for the purpose of an investigation shall be immediately made to the designated facility or agency investigator. In addition, all allegations of sexual abuse that involve potentially criminal behavior shall be referred for criminal investigation to the

	Kentucky State Police (KSP)." Core Civic LAC policy 14-07-01 states "All reports of sexual abuse and sexual harassment will be reported to the facility investigator." Warden Interview – The Warden said reports of sexual abuse are required to be referred to Facility Investigator. He said the Facility Investigator will provide all reports of sexual abuse to the Kentucky State Police for review and criminal investigation. Investigation Report review – a review of sixteen sexual abuse investigations found that reports were forwarded to facility investigators immediately. The Facility Investigator contacted the Kentucky State Police to provide the report in all sixteen sexual abuse investigations. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.

115.62	**Agency protection duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states "Upon learning that an offender was sexually abused, the staff member shall immediately ensure the safety of the alleged victim while reporting the information to the shift supervisor. The shift supervisor shall activate the coordinated response plan and ensure the following steps have been taken: The separation of the alleged victim and perpetrator." LAC reported on the Pre-Audit Questionnaire not having any incidents where an inmate was at substantial risk of imminent sexual abuse during the review period. Agency Head Interview – The Vice President said staff are required to take immediate action to protect an inmate that is in substantial risk of imminent sexual abuse by removing the inmate from the area or individuals where risks may be stemming from. Warden Interview – The Warden said if an inmate was in substantial risk of imminent sexual abuse, they would separate the inmate from the perpetrator and move the inmate to another open population housing unit if possible or offer PC in RHU if the inmate does not feel safe in population. In the case of a staff perpetrator, staff would be removed from contact with the inmate. Random Staff Interview – All staff interviewed said they would separate the victim form other inmates or the staff is the subject of the allegation and keep the inmate with them if there was a substantial risk of imminent sexual abuse. They would contact the shift supervisor or PCM immediately. Staff said they would bring the

	inmate to the Shift Supervisor office or another location that is safe, such as medical. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets all provisions of the standard.

115.63	**Reporting to other confinement facilities**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a, b) KDOC 14.7 Sexual Abuse Prevention policy states "Within seventy-two (72) hours of receiving an allegation that an offender was sexually abused while confined at another facility, the Warden shall notify the head of the facility where the alleged incident occurred. The notification shall be documented." Core Civic LAC policy 14-07-01 states "Upon receipt of an allegation that an offender was sexually abused while confined at another facility (e.g. while housed at another provider's facility, state facility, federal facility or local facility), the Warden will ensure that appropriate notification is made. The Warden shall contact the facility head or appropriate office of the facility where the alleged abuse took place as soon as possible, but no later than seventy-two (72) hours after receiving the allegation." Warden Interview – The Warden said he would forward reports of sexual abuse that occurred at another facility to the facility head of that facility within 72 hours. He would call the facility with the information first and then email the information to document it was provided. LAC provided documentation of one report from an inmate at LAC for an incident that occurred at another KDOC facility. The Warden emailed the Warden of another KDOC facility to provide the information reported by the inmate at LAC within 72 hours after the inmate reported to the staff at the facility. c) Core Civic LAC policy 14-07-01 states "The facility shall document the allegation, and the name and title of the person contacted. A copy of the statement of the offender shall be forwarded to the appropriate official at the location where the incident was reported to have occurred. All such contacts and notifications shall be documented on appropriate Incident Report forms. The form shall include the allegation, and any details learned from contact with the site where the alleged abuse took place." d) KDOC 14.7 Sexual Abuse Prevention policy states "All allegations received from other facilities shall be investigated." Core Civic LAC policy 14-07-01 states upon receipt of a notification from another facility that an offender was allegedly sexually abused while previously confined at the Lee Adjustment Center, the Warden shall ensure that an investigation is

	conducted in accordance with the section Administrative and Criminal Investigations of this policy. Agency Head Interview – These reports are usually received by the facility. If the PREA Coordinator receives a report, it is forwarded to the identified facility for investigation. If the facility received a report from another facility about an incident that occurred at the receiving facility, it is entered into the system and PREA protocols are followed, including assigning it for investigation. Warden Interview – The Warden said there was one report of alleged sexual abuse that was received from another facility during the review period. The alleged incident was from 2022 and very little information was provided by the victim. The information was given to the Facility Investigator and an investigation was completed. The facility reported receiving two allegations of sexual abuse from another facility. One was received through an anonymous call through the KDOC PREA hotline at another facility. The other was received from the Warden of another KDOC facility. Investigation Review – Two investigations of a alleged sexual abuse received from a former inmate at another KDOC facility were reviewed. The information was provided to the Facility Investigator on the same day it was received and an investigation was started in both cases. A prompt and thorough investigation was completed. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.

115.64	**Staff first responder duties**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-1) KDOC 14.7 Sexual Abuse Prevention policy section G Initial Reporting and Staff First Responder Duties outline the first responder policy for allegations of sexual abuse. a-2,3) The policy states "Upon learning that an offender was sexually abused, the staff member shall immediately ensure the safety of the alleged victim while reporting the information to the shift supervisor. The shift supervisor shall activate the coordinated response plan and ensure the following steps have been taken: a. The separation of the alleged victim and perpetrator. b. The security and protection of any crime scene to keep potential evidence in place for examination and investigation. c. Notifications made to the warden, investigator, and other designated agency and facility leadership and all required incident reporting procedures.

	d. The only persons permitted to enter a secured crime scene shall be Kentucky State Police, the assigned investigator or medical staff as needed. e. A log shall be maintained of anyone entering the crime scene and at what time he entered and exited. Anyone entering the crime scene shall be videotaped as additional documentation. f. The area shall remain secured as a crime scene until verification of a completed investigation and released by the investigating authority." a-4) "If the incident occurred within the previous ninety-six (96) hours, the alleged victim and alleged perpetrator shall not take any actions that could destroy physical evidence which includes: washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating." Core Civic LAC policy 14-07-01 states "If the abuse occurred within a time period that still allows for the collection of physical evidence, the alleged victim shall be instructed not to 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, the alleged abuser shall be instructed not to take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating." Investigation Report Review – There were sixteen investigations of sexual abuse reviewed. In five investigations, the inmate victim had to be separated from the perpetrator. There were four incidents reported that allowed for the collection of evidence at the scene and through a forensic examination. b) Core Civic LAC policy 14-07-01 states "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 notify security staff." Staff Interviews – All twelve security staff interviewed were asked to describe their responsibilities and steps they are required to complete when an inmate makes an alleged report of sexual abuse/sexual assault. Security staff said they were required to separate the victim from the perpetrator, protect evidence on the victim and at the scene and notify the Shift Supervisor. Security staff said they may be asked to take the inmate victim to medical or protect the scene if another security staff comes to take custody of the inmate. Medical and contract staff interviewed said they were required to contact the Shift Supervisor's office immediately after an inmate reports sexual abuse or sexual harassment to them. They knew keep the inmate separate from other inmates and how to protect evidence until a security staff could arrive. Inmate Interviews – Two inmates were interviewed that reported sexual abuse. Both said they were separated from other inmates when they reported the incident of sexual abuse. Both were told not to change clothes, eat, brush their teeth or allowed

	to go to the bathroom. Staff stayed with them until they were taken to medical. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.

115.65	**Coordinated response**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Lee Adjustment Center provided a Sexual Assault Action Plan for review. The plan is specific to the Lee Adjustment Center. The plan contains information pertaining to the roles and actions for first responders, medical and mental health staff, investigators, Kentucky State Police, and facility executive staff in response to allegations of sexual abuse of an inmate. The plan describes the procedures to follow once a report of sexual abuse is received to include reporting to appropriate staff, evidence protection and collection, investigation that involves coordination between facility investigators and Kentucky State Police, and medical and mental health response and aftercare. Information is provided on where to take an inmate victim for a forensic medical examination and the process for transport. Warden Interview – The Warden said the facility has a plan for response to an allegation of sexual abuse/assault. The plan provides direction to first responders for protection of the victim and evidence, tells shift supervisors the actions to be taken in response and notification of the Kentucky State Police. Based on the information from the Warden's interview and the plan reviewed, the facility meets the standard.

115.66	**Preservation of ability to protect inmates from contact with abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Warden provided a memorandum that states the KDOC or CoreCivic LAC do not have a collective bargaining agreement. LAC can separate staff from an inmate that alleges sexual abuse as needed. Therefore, this standard is not applicable.

115.67	**Agency protection against retaliation**
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states "Retaliation by or against any party, staff or offender, involved in a complaint or report of sexual abuse or sexual harassment shall be strictly prohibited. Retaliation in and of itself, shall be grounds for disciplinary action and will be investigated." b & e) KDOC 14.7 Sexual Abuse Prevention policy states "Emotional support services shall be provided as well as appropriate measures taken to protect any individual who expresses a fear of retaliation." Agency Head Interview – The Vice President said retaliation monitoring is provided for both inmates and staff with meetings every 30 days up to 90 days. Staff look for actions that can be perceived as retaliation such as housing or job changes for inmates or shift changes for staff. The victim of sexual abuse or sexual harassment, witnesses and any other individual involved in reporting the incident will be monitored for retaliation. Warden Interview – We keep the victim separate from the abuser and the PCM conducts retaliation monitoring. They can move inmates or staff that are retaliating against a victim. They can also do a housing change if the victim is concerned with several inmates retaliating. Staff Designated Retaliation Monitoring – The PCM said in cases of sexual abuse he has an initial meeting with the victim and then meets with them every 30 days up to 90 days or more if needed. He meets with the victim once a month. The inmate can contact him if there are concerns between meetings. He can move the victim if there are concerns with other inmates in the housing unit; he can offer the victim PC in RHU; move, discipline or suspend staff if there is evidence about retaliation. He can refer the victim to mental health if there are concerns with fear of retaliation. Inmates that Reported Sexual Abuse – Two inmates that reported sexual abuse that were interviewed said they had meetings with the PCM for retaliation monitoring once a month. Neither reported any concerns. c-d) KDOC 14.7 Sexual Abuse Prevention policy states "Monitoring shall occur for at least ninety (90) days following an allegation of sexual abuse or sexual harassment. In cases when monitoring offenders, periodic status checks shall be conducted by the PREA Compliance Manager as needed, but at least once every thirty (30) days. Status checks shall be conducted more often if concerns are expressed by the offender." Core Civic LAC policy 14-07-01 states "Ensure that thirty/sixty/ninety (30/60/90) day retaliation monitoring is conducted by the designated staff following a report of sexual abuse to protect against potential retaliation against offenders or employees. This shall include periodic status checks of offenders and review of relevant documentation." Staff designated Retaliation Monitoring – A Case Manager said the retaliation

	monitoring is being completed by Case Managers for the inmates on their caseload when needed. She said when monitoring for retaliation she reviews housing assignments, jobs, discipline reports in addition to meeting with the inmate victim or witness to ask if they have experienced retaliation. She also checks with the Unit Manager for concerns with retaliation as well. She said there were no incidents or appearances of retaliation during the review period. If the victim did report retaliation to him, he would do an investigation based on the report. Document Review – Retaliation monitoring forms were provided for review for sixteen incidents of sexual abuse and one incident of sexual harassment. The forms provide the incident date and the date the monitoring begins. There is a checklist of concern the inmate may have and protection measures employed at each meeting. The protection measures include housing unit change, facility transfer, removal of alleged abuser, emotional support services offered. The reported concerns can be disciplinary report, housing unit change, program change, work reports/assignment. There is a column for each meeting from the initial to the 90-day meeting. There were also notes provided with the form that summarize the meeting with the inmate. The document review found that monitoring began from two months to seven months after the inmate reported the incident of sexual abuse. One investigation involved three inmate victims but documentation of monitoring for retaliation was only provided for one inmate that was seven months after the report was made when it was discovered the prior PCM did not complete monitoring. An inmate victim received no documented monitoring prior to transferring to another facility. f) KDOC 14.7 Sexual Abuse Prevention policy states “Monitoring shall cease if the investigation determines that the allegation is unfounded.” Corrective Action Required: Retaliation monitoring was started late in nine investigations of sexual abuse and not provided for all inmate victims immediately after a report of sexual abuse. Retaliation monitoring documentation will be reviewed for inmates that are currently being monitored and for any new reports of sexual abuse that occur during the corrective action review period to determine if the current practice meets the standard. **Corrective Action Completed:** The CoreCivic PREA Coordinator completed retaliation monitoring training with LAC staff designated to monitor for retaliation during the last day of the onsite audit. Documentation of the training completion attendance was provided. The facility provided documentation of retaliation monitoring for five inmates that reported sexual abuse. Monitoring began at or shortly after the inmate reported sexual abuse. Staff documented a review of protection measures such as housing, facility transfer, removal of alleged inmate abusers, and emotional support services offer. Staff also documented a review of disciplinary reports, housing changes, program changes, and work reports or assignment changes. Staff also documented notes for each meeting with the inmate on an additional page. Monitoring ended prior to 90 days in all five due to facility transfer or a finding of unfounded. Based on the information from interviews, policies and documents reviewed, it has been determined the facility now meets all provisions of the standard.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states "Victims of sexual abuse or those at high risk for abuse shall not be placed in involuntary protective custody or segregation unless all available alternatives have been assessed and documented and are not available. The facility may only hold the offender for twenty –four (24) hours in involuntary segregation while completing the assessment, and if the placement has to continue, must document why there are no other available alternatives and provide access to programs, education, work and other privileges to the extent possible." Core Civic LAC policy 14-07-01 Sexual Abuse Prevention states "Offenders 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 offender in involuntary segregated housing for less than twenty-four (24) hours while completing the assessment." Warden Interview – The Warden said if the staff feel an inmate might be at high risk of victimization in general population after reporting sexual abuse, the Unit Manager will look for alternative open population housing placement that is safe as the priority. Use of restrictive housing would be a last resort. If an inmate is only safe in restrictive housing, a transfer would be requested. He said placement in segregation is reviewed in 24 hours and approved by him. He has not had to place an inmate in segregation that was high risk of victimization during the review period. Segregation Staff Interview – A Unit Manager that is the supervisor of restricted housing was interviewed. She said there were no inmates placed involuntarily in segregation during the review period that were determined to be too vulnerable to sexual abuse in population after making a report. Restrictions to programs, privileges, education and work opportunities would be documented in classification hearings. A review of the restricted housing placement is conducted every week after the initial placement review. Document Review – No alleged victim was involuntarily placed in segregation after a report of sexual abuse in any of the sexual abuse investigations reviewed. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.

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

	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states “All allegations of sexual abuse and sexual harassment shall be promptly, thoroughly and objectively investigated, including third-party and anonymous reports.” Core Civic LAC policy 14-07-01 states “The Warden shall ensure that an administrative investigation and a referral for a criminal investigation, where appropriate, are completed for all allegations of sexual abuse and sexual harassment.” Facility Investigator Interview – The Facility Investigator said he is immediately notified of the report, and investigations can be initiated either on the same day of the report or within a few days depending on the circumstances of the type of incident. b) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states “Investigations into allegations of sexual abuse must be investigated by an employee who has received training in the investigation of sexual abuse cases.” Facility Investigator Interview – The Facility Investigator said he has completed the specialized investigation training with NIC when he was an investigator with KDOC. He said it covered evidence collection, interviewing victims, report writing, what it takes to substantiate a case or refer for prosecution, and Miranda and Garrity warnings. c) KDOC 14.7 Sexual Abuse Prevention policy requires Investigators to: Gather and preserve all direct and circumstantial evidence, including any available physical and DNA evidence, and any available electronic monitoring data; interview the alleged victim, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy requires investigations to include investigative facts, physical evidence, and testimonial evidence. Facility Investigator Interview – The Investigator said he gathers the available information about the initial report to first responders and then plans to interview the victim. After the interview with the victim, he may review video evidence, interview potential witnesses, review the background before interviewing the alleged perpetrator. Investigation Report Review – Seventeen completed administrative investigations were reviewed. All administrative investigations included information about interviews with the victim, witnesses, and the alleged perpetrator. A review of video evidence and the background of the victim and subject, both inmate and staff, was documented in all investigatgions. It was documented in four investigations that the victim was transported to a hospital for a forensic examination. d) Investigator Interview – The investigator said all reports of sexual abuse are forwarded to the Kentucky State Police for review and possible criminal investigation.

The KSP would do compelled interviews and consult with local prosecutors. He will contact the KSP for updates on the case.

Investigation files were not made available to the facility from KSP and could not be reviewed.

e) KDOC 14.7 Sexual Abuse Prevention policy states “The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the individual’s status as an offender or staff member. An offender who alleges sexual abuse shall not be required to submit to a polygraph examination or other truth-telling device as a condition to proceed with the sexual abuse investigation.”

Facility Investigator Interview – The Facility Investigator said he is not trained to use a truth telling device. He said policy prohibits the use of a truth telling device on a victim.

f) KDOC 14.7 Sexual Abuse Prevention policy states “Administrative investigations that result in a substantiated case of sexual abuse shall include an effort to determine whether staff actions or failures to act contributed to the abuse.”

Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states “The administrative investigation shall include an effort to determine whether staff actions or failures to act contributed to the abuse. Credibility shall be assessed on an individual basis and shall not be determined by the person's status as an offender or employee.”

Facility Investigator Interview – The Investigator said he reviews the actions of staff to determine if their actions contributed to the sexual abuse. He also reviews the response of staff to the report or if they failed to report immediately as required.

g) KDOC 14.7 Sexual Abuse Prevention policy states “Investigations shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, the review of prior complaints and reports of sexual abuse involving the suspected perpetrator, and investigative facts and findings.”

Investigation Report Review - Seventeen completed administrative investigation case files were reviewed. All seventeen completed investigations were documented in investigation report. The facility was not provided with a criminal investigation report for alleged sexual abuse investigated by the Kentucky State Police.

h) Facility Investigator Interview - The Facility Investigator said the Kentucky State Police will determine if there is a criminal violation that needs to be a referred to the prosecutor.

i) Core Civic LAC policy 14-07-01 states “All case records associated with claims of sexual abuse, including incident reports, investigative reports, offender information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling shall be retained in

	accordance with CoreCivic Policy 1-15 Retention of Records and the Kentucky Department of Corrections Record Retention Schedule.” The CoreCivic Record Retention Schedule 1-15B was provided for review. It requires PREA Investigations Files and written reports to be retained for 5 years after the inmate release or pos-employment of the alleged abuser. j) KDOC 14.7 Sexual Abuse Prevention policy states “The departure of the alleged perpetrator or victim from the employment or control of the facility or department shall not provide a basis for terminating an investigation.” Facility Investigator Interview – The Facility Investigator said if the staff resign prior to completing the staff interview, he will continue the investigation by attempting to contact the staff by phone. If an inmate victim or perpetrator is transferred prior to interview, he will contact the next facility to arrange the interview. If the inmate is released, he will attempt to contact them by phone with available contact information. l) KDOC 14.7 Sexual Abuse Prevention policy states “Criminal Investigations into allegations of Sexual Abuse will be conducted by the Kentucky State Police in accordance with the Code of Federal Regulations, Title 28, Part 115.21, Evidence Protocol and Forensic Medical Examinations.” Facility Investigator Interview – The Facility Investigator said the Kentucky State Police completes all criminal investigations for LAC. He said KSP does not provide a copy of their investigation report. He can contact the local post to get updates when KSP decides to conduct a criminal investigation. Investigation File Review – It was documented in administrative investigations if KSP was pursuing a criminal investigation or if they determined a criminal investigation was not required. It appears the Facility Investigator has communication with the KSP investigator; however it is recommended the communication is documented in email and retained by the facility. Based on the information from interviews, policies and documents reviewed, it has been determined the facility has demonstrated substantial compliance with the provisions of the standard.

115.72	**Evidentiary standard for administrative investigations**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	KDOC 14.7 Sexual Abuse Prevention policy states “No standard higher than a preponderance of the evidence shall be imposed in determining whether allegations

	of sexual abuse or sexual harassment are substantiated for administrative investigations." Facility Investigator Interview – The Facility Investigator said he uses the evidence standard of preponderance of the evidence to determine the outcome for administrative investigations. Criminal investigations are conducted by the Kentucky State Police. Investigation File Review – Sixteen completed administrative investigations that occurred during the review period, and one completed administrative investigation completed after the onsite audit were provided for review. The evidence standard used to determine the outcome of the investigations was found to be based on a preponderance of evidence in all cases. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets this standard.

115.73	**Reporting to inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) Core Civic LAC policy 14-07-01 states "Following completion of an administrative or criminal investigation, the allegation will be classified as follows 115.73 (a)(b)): a. Substantiated – An incident shall be classified as substantiated if the results of the investigation determine that the allegation did occur. b. Unsubstantiated – An incident shall be classified as unsubstantiated if the results of the investigation determine that the evidence was insufficient to make a final determination of whether or not the allegation occurred. c. Unfounded – An incident shall be classified as unfounded if the results of the investigation determine the allegation did not occur. The CoreCivic policy reflects the requirements of this provision. b) Facility Investigator Interview – The Investigator said KSP completes all criminal investigations. He requests the investigation report but does not get a response. He said he will follow up with the KSP investigator to find out if they are filing charges with the prosecutor or not pursuing the investigation further. PCM Interview – The PCM/AW said the Kentucky State Police conduct all criminal investigations of sexual abuse. The facility refers all allegations of sexual abuse to the KSP. He said KSP does not investigate all sexual abuse allegations. They usually let the facility know they will or will not be pursuing the investigation. The Facility

	Investigator will notify the inmate if KSP is conducting the investigation and filing charges with the prosecutor or if they did not pursue the investigation. Recommendation: This auditor recommends the Facility Investigator send a written request for the investigation status and outcome to KSP Investigators periodically after providing a report of sexual abuse to KSP. The written request should be emailed to document the communication. c) CoreCivic LAC policy 14-07-01 states “Following an offender allegation that an employee has committed sexual abuse against the offender, the facility shall subsequently inform the offender (unless the facility has determined that the allegation is unfounded) whenever: a. The employee is no longer posted within the offender unit as a result of the findings of the investigation; b. The employee is no longer employed at the facility as a result of the allegation; c. The facility learns that the employee has been indicted on a charge related to sexual abuse within the facility; or d. The facility learns that the employee has been convicted on a charge related to sexual abuse within the facility.” d) CoreCivic LAC policy 14-07-01 states “Following an offender allegation that he/she has been sexually abused by another offender, the facility shall subsequently inform the alleged victim whenever: a. The facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or b. The facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.” The CoreCivic policy reflects the requirements of this provision. e) CoreCivic LAC policy 14-07-01 states “All offender notifications or attempted notifications shall be documented on the KYDOC Offender Notification-PREA Alleged Sexual Abuse form or the KYDOC Offender Notification-PREA Alleged Sexual Abuse by Staff Member form as appropriate. The offender shall sign the bottom of the form or in the Comments section verifying that such notification has been received. The signed forms shall be filed in the offender institutional file.” Warden Interview – The Warden said the Facility Investigator or PCM will notify the inmate of the outcome of investigations in writing using a KDOC Offender Notification form.

	Facility Investigator Interview – The Facility Investigator said an investigator or PCM notifies the victim of the outcome for sexual abuse investigations. Outcomes are either substantiated, unsubstantiated or unfounded. Inmate Interviews – Two inmates were interviewed that reported sexual abuse at LAC. One could not recall if he was notified of the investigation outcome and one said he was provided the outcome in writing. Document Review – a KDOC Offender Notification form was provided in fifteen of the sixteen investigations that were reviewed. One investigation was an anonymous report from another facility. The PCM or Facility Investigator signed all notifications. Only three inmates signed in the comments box indicating they received the notice of outcome. The KDOC policy requires the inmate to sign in the comment box. Having an inmate signature verifies the inmate was notified of the outcome. It is recommended that LAC use the CoreCivic form for notification or the KDOC add an inmate signature line on the form. Six of the Notices were completed months after the close of the investigation and dated December of 2025. Though there is no required time frame to complete the notification in the standard, it appears the notices were completed after a review in December of 2025 discovered they were not completed five to nine months after the investigation close date. The KDOC Offender Notification form was provided for an investigation that closed after the onsite audit to show current practice. The form was dated three weeks prior to the Warden's review date, the date staff told this auditor was the close of an investigation. Due to the inconsistency in providing a properly documented investigation outcome to the inmate victim, the KDOC Offender Notification forms will be reviewed for completed investigations f) CoreCivic LAC policy 14-07-01 states "The facility's obligation to notify the offender as outlined in this section shall terminate if the offender is released from CoreCivic custody." Corrective Action Required: Outcome notifications will be reviewed for completed investigations during the corrective action period to determine compliance with the standard. Notifications must be signed by the inmate or refusal documented and be documented soon after the close date of the investigation. **Corrective Action Completed:** Five inmates were notified of the outcome for sexual abuse investigations. Two were notified by the investigator at LAC. Three had been transferred to another facility prior to the conclusion of the investigation, however the LAC sent the completed Offender Notification – PREA form to the receiving facility for the inmate to be notified and sign the form. The signed forms were provided as verification of the inmate being provided with the investigation outcome though it is not required after the inmate transfers.

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

	Auditor Discussion
	a) KDOC 3.22 Staff Sexual Offenses policy contains the definition for sexual abuse and sexual harassment of an inmate by staff, contractor or volunteer. The policy provides the prohibited behaviors for staff and the "final action" for those behaviors. Staff found to have violated the policy "shall be subject to disciplinary action up to and including dismissal, based upon the findings of the investigation." "Any staff member found to have engaged in sexual abuse based upon the findings of the investigation may be terminated." b) CoreCivic LAC 3-36 Employee Corrective Action policy states "CoreCivic reserves the right to effect immediate termination as warranted by the conduct at issue and circumstances." There were no substantiated staff sexual abuse investigations during the review period. CoreCivic LAC policy 14-07-01 states "Employees shall be subject to disciplinary sanctions up to and including termination for violating CoreCivic's sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for employees who have engaged in sexual abuse." c) CoreCivic LAC 3-36 Employee Corrective Action policy states "Corrective Action normally will be taken in a progressive sequence according to the following schedule." The schedule is Documented verbal Counseling, Level 1 to Level 3 Corrective Action, and Termination. CoreCivic LAC policy 14-07-01 states "Disciplinary sanctions for violations of CoreCivic policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the employee's disciplinary history, and the sanctions imposed for comparable offenses by other employees with similar histories." d) CoreCivic LAC policy 14-07-01 states "All terminations for violations of CoreCivic sexual abuse or sexual harassment policies, or resignations by employees who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies." Warden Interview – The Warden said if there is a substantiated finding in a sexual abuse investigation where the staff are the perpetrator, the staff will be subject to discipline review that will more than likely result in termination. This will be determined on a case-by-case basis. The policies reflect the requirements for each provision of the standard. Based on the information from interviews and policies reviewed, it has been determined the facility meets the provisions of the standard.

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

	Auditor Discussion
	a-b) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states "Any civilian or contractor who engages in sexual abuse shall be prohibited from contact with offenders and shall be reported to law enforcement agencies and to any relevant licensing body. Any other violation of CoreCivic sexual abuse or sexual harassment policies by a civilian or contractor will result in further prohibitions." There was no contract staff or volunteer involved in a sexual abuse or sexual harassment incident that had a substantiated outcome in any of the investigation case files reviewed. Warden Interview – The Warden said he would use a gate closure on a contract staff or volunteers suspected of sexual abuse of an inmate to prevent entry into the facility while the allegation is being investigated. If there is a substantiated incident of sexual abuse involving a contract staff or volunteer, they would be referred to the licensing board when applicable. If there was a criminal violation, the Kentucky State Police would make a referral to the prosecutor based on the criminal investigation. Based on the information from interviews and policies reviewed, it has been determined the facility meets all provisions of the standard.

115.78	**Disciplinary sanctions for inmates**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states "Offenders may be disciplined for substantiated incidents of offender-on-offender sexual abuse according to CPP 15.2." KDOC 15.2 Rules Violations and Penalties policy provides a definition for sexual assault and sexual behavior. Sexual behavior is a Category IV major violation and sexual assault is a Category VII major violation. Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states "All offenders found guilty of sexual abuse shall be institutionally disciplined in accordance with the facility disciplinary procedures." "Because the burden of proof is substantially easier to prove in an offender disciplinary case than in a criminal prosecution, an offender may be institutionally disciplined even though law enforcement officials decline to prosecute." b) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states "Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the offender disciplinary history, and the sanctions imposed for comparable offenses by other offenders with similar histories."

	Warden Interview – The Warden said sanctions for perpetrators of sexual abuse are the circumstances of the case, the inmate's prior discipline history and sanctions given for similar offenses to other inmates. Document Review – LAC had one substantiated inmate-on-inmate sexual abuse case during the review period. The facility failed to subject the inmate perpetrator to the inmate disciplinary process. This does not follow the requirements of the standard or the facility policy. c) KDOC 14.7 Sexual Abuse Prevention policy states "If an offender has pending disciplinary sanctions for alleged offender-on-offender sexual abuse, consideration shall be given as to whether the offender's mental disabilities or mental illness contributed to his or her behavior when determining what level of sanction, if any, will be imposed." Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states "The disciplinary process shall consider whether an offender mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed." Warden Interview – The Warden said the inmate's mental health and other mitigating factors can be considered in deciding sanctions. d) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states "If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the alleged perpetrator to participate in such interventions as a condition of access to programming or other benefits." Mental Health Staff interview – The Mental Health staff said she can provide therapy for known perpetrators of sexual abuse. She can do an assessment and review the incident details. She tries to determine what the triggers are for abusive behavior. She said she will focus on what the inmate needs. The follow-up services are not required for participation in other programs. e) KDOC 14.7 Sexual Abuse Prevention policy states "Offenders may not be disciplined for sexual abuse of a staff member if the staff member consented." Core Civic LAC policy 14-07-01 states "An offender may be disciplined for sexual conduct with an employee only upon a finding that the employee did not consent to such contact." The facility provided a disciplinary case against an inmate for sexual assault for inappropriate sexual contact with staff during the review period. The staff did not consent to the contact and wrote a discipline report on the inmate. f) KDOC 14.7 Sexual Abuse Prevention policy states "An offender may be disciplined for reporting a false allegation of sexual abuse or sexual harassment only where the facility can demonstrate the false allegation was knowingly made in bad faith. A report made in good faith based upon a reasonable belief that the alleged

	conduct occurred shall not constitute a false report or lying even if an investigation does not establish evidence sufficient to substantiate the allegation." g) Core Civic LAC policy 14-07-01 Sexual Abuse Prevention policy states "Sexual activity between offenders is prohibited in all CoreCivic facilities, and offenders may be disciplined for such activity. Such activity shall not be deemed sexual abuse if it is determined that the activity is not coerced." Document Review – The facility reported 5 incidents of discipline for consensual sexual activity between inmates in the review period. The discipline case documents were provided for all ten inmates and appeared to be consensual with no coercion. The behavior violated the KDOC policy 15.2. Corrective Action Required: LAC had one substantiated inmate-on-inmate sexual abuse case during the review period. The facility failed to subject the inmate perpetrator to the inmate disciplinary process. This does not follow the requirements of the standard or the facility policy. The PREA coordinator must provide training that covers the requirements of this standard to the staff responsible for submitting discipline reports for substantiated inmate sexual abuse. Documentation of the training curriculum and staff attendance will be provided to the auditor. Corrective Action Completed: The CoreCivic PREA Coordinator provided a refresher information email and directive to staff during the post onsite audit period that contained the requirements of the standard with provision (a) that requires a formal disciplinary process to be completed for inmate perpetrators of sexual abuse in a substantiated investigation finding. This corrective action is completed at the interim audit report due to the infrequency of substantiated findings. If there is a substantiated finding prior to the final report, this standard will be updated. Based on the information from the corrective action completed, interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.

115.81	**Medical and mental health screenings; history of sexual abuse**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-b) KDOC 14.7 Sexual Abuse Prevention policy states "When an assessment indicates an offender has experienced victimization or previously been a perpetrator, staff shall ensure the offender has been offered a follow-up for counseling and monitoring with the appropriate medical or mental health professional within fourteen (14) days of the assessment." Inmate Interviews – Inmates that disclosed being a prior victim of sexual abuse were interviewed. All reported being seen by mental health within a few days after

	informing staff they were a prior victim of sexual abuse. Risk Screening Staff Interview – The Case Manager said if an inmate is a prior victim of sexual abuse or a prior perpetrator of sexual abuse (convicted sex offender) they make a referral to mental. Document Review – Thirty risk screenings were randomly selected and reviewed. Eleven inmates either reported being a prior victim of sexual abuse or were a prior perpetrator of sexual abuse. Documentation of mental health referrals was provided for all eleven inmates. Eight had mental health referrals documented several months and up to a year after arrival. Only three were completed within the required time frame of 14 days after arrival. This does not meet the standard. d) KDOC 14.7 Sexual Abuse Prevention policy states “The dissemination of information related to and resulting from the assessment shall be controlled and limited to staff necessary to inform treatment plans and make security and management decisions regarding housing, beds, work, education and program assignments.” Tour Observation – Paper mental health and medical records are retained in locked cabinets and a locked office in medical and mental health areas. The electronic records are in a system that is limited to mental health and medical personnel by login access for authorized staff. The risk screening information is retained in a login access electronic system that is restricted to authorized staff. e) KDOC 14.7 Sexual Abuse Prevention policy states “Medical and mental health professionals shall obtain informed consent from the offender prior to reporting information related to a prior sexual victimization that did not occur in a facility, unless the offender is under 18 years old.” Medical Staff Interview – The Health Services Administrator said medical staff would need consent from the inmate to release information to investigators or other staff about an incident of sexual abuse that did not occur in a correctional facility. She said there were no informed consents completed for a report of sexual abuse outside of an institution during the last year. Mental Health Interview – The mental health staff said an inmate would have to sign a release of information for her to share information about an incident of sexual abuse that did not occur in a correctional facility. She said there were no informed consents completed during the review period for a report of sexual abuse outside of an institution. Corrective Action Required: Eight mental health referrals for prior victims and prior perpetrators were documented several months and up to a year after the inmate arrival. Only three were completed within the required time frame of 14 days after the inmate arrival after December of 2025, during the last three months of the sample. The KDOC PREA Coordinator provided training covering this standard’s requirements for the staff that complete the risk assessments on February 5, 2026. Documentation of the training and attendance were provided. A sample of risk

	assessments will be reviewed for inmates that arrived after the training to verify the correction in practice. Mental health referrals will be reviewed for any prior victims or prior perpetrators during the post-audit period. **Corrective Action Completed:** An additional sample of thirty randomly selected intake risk assessments was reviewed after the onsite audit. Thirteen inmates reported being a prior victim of sexual abuse or were a prior perpetrator of sexual abuse requiring a mental health referral within 14 days of arrival. A KDOC PREA Risk Assessment Medical and Mental Health Recommendation form was completed within 14 days of arrival for Twelve of the thirteen inmates demonstrating substantial compliance with the standard. One was completed more than 14 days after arrival at the facility. All required referrals were completed.

115.82	**Access to emergency medical and mental health services**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) KDOC 14.7 Sexual Abuse Prevention policy states "In coordination with the hospital, the Medical Department shall request the forensic medical examination be performed by a Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) or other qualified medical practitioner. The efforts to provide SAFEs or SANEs shall be documented." Core Civic LAC policy 14-07-01 states "The Health Services Department is responsible for medical stabilization and assessment of the victim until transported to an outside medical provider, if medically indicated, for collection of evidence and any necessary medical treatment." Medical Staff Interview – The Health Services Administrator interviewed said she would work with KSP to arrange for the victim of a sexual assault to be provided with a forensic exam at a local hospital that had a SANE on shift at the time. She said the first choice is Marcus and Wallace Hospital that is closer to the facility. If they do not have a SANE on duty, they will go to the University of Kentucky medical center. Medical staff at LAC can check for emergent medical issues resulting from injuries during the assault and stabilize the victim. Mental Health Staff Interview – The Mental Health Staff interviewed said crisis counseling services are offered and provided to inmate victims of sexual abuse. Investigation Review – Inmates that reported sexual abuse were provided a medical evaluation in the medical services department immediately after reporting. Four inmates that reported incidents of sexual abuse were required to be sent to the hospital for a forensic exam. Documentation was provided that verified the inmates were provided the exam. The investigation case file documentation indicates facility medical staff evaluated the victim immediately after reporting sexual abuse and

	worked with KSP to arrange for the forensic exam. Inmate Interview – An inmate that reported sexual abuse said he was transported to the hospital for a forensic exam after he was seen in the facility medical department. b) First Responder Interviews – All staff at LAC are considered first responders. All staff said they would protect the victim, notify the shift supervisor and wait for other custody staff and medical staff to respond or they may be asked to take the inmate to medical. c) Medical staff interview – Medical staff said victims of sexual assault would be provided follow up treatment for STI. If the inmate chooses not to go to the forensic exam or the time frame doesn't allow for a forensic exam, the facility medical staff can provide the STI testing and treatment. Inmate Interview – An inmate that reported sexual abuse said he was seen by medical after he returned to the facility. d) KDOC 14.7 Sexual Abuse Prevention policy states "The examination shall be at no cost to the offender." Core Civic LAC policy 14-07-01 states "All victims of sexual abuse shall have access to forensic medical examinations, whether onsite or at an outside facility, without financial cost, where the exam is necessary to obtain evidence or is medically appropriate." Inmate Interview – An inmate that went to the hospital for a forensic exam said he was not charged for the exam. Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.

115.83	**Ongoing medical and mental health care for sexual abuse victims and abusers**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-c) KDOC 14.7 Sexual Abuse Prevention policy states "All offenders who have been victims of sexual abuse in any correctional facility shall be offered medical and mental health evaluations and as deemed appropriate, any necessary treatment related to the sexual abuse. This includes timely and 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." Medical Staff Interview – The Health Services Administrator said all inmates that have

	been a victim of sexual abuse would be provided medical and mental health follow up services. This may include wound treatment or dispensing medication for prophylaxis. Medical staff will also complete a mental health referral. Mental Health Staff Interview – Mental health staff said treatment for victims of sexual abuse are developed based on symptoms presented. She said mental health counseling follow up services and treatment would be offered and provided to an inmate victim of sexual abuse. A referral could be made to outside services if they are released. Inmate Interview – An inmate that reported sexual abuse said he is being provided follow up medical and mental health services. f) KDOC 14.7 Sexual Abuse Prevention policy states "This also includes timely and comprehensive information about emergency contraception, pregnancy testing, sexually transmitted infection testing and prophylaxis, and lawful pregnancy-related medical services deemed appropriate by the medical practitioner." Inmate Interview – An victim of sexual abuse said he was tested for STI's and is receiving follow-up medications. g) KDOC 14.7 Sexual Abuse Prevention policy states "Current and previous victims of sexual abuse shall receive any medical and mental health services related to the sexual abuse at no cost to the offender." Inmate Interview – An inmate that went to the hospital for a forensic exam said he was not charged for the exam. h) KDOC 14.7 Sexual Abuse Prevention policy states "Mental health practitioners shall attempt to conduct an evaluation on all known offender-on-offender perpetrators within sixty (60) days of learning of such abuse and provide treatment as deemed appropriate." Mental Health Staff interview – The Mental Health Director said she provides therapy for abusers. She does an assessment and reviews the incident details. She tries to determine what the triggers are for abusive behavior. Corrective Action Required: One investigation of sexual abuse had a substantiated outcome. The inmate perpetrator was not referred to mental health by staff within 60 days as required by this provision of the standard. The PREA Coordinator will provide training on the requirements of this provision to all staff involved in the referral process. Documentation of the training will be provided. **Corrective Action Completed:** The CoreCivic PREA Coordinator provided a refresher directive to LAC staff responsible for ensuring victims and perpetrators of substantiated sexual abuse investigations are referred to mental health. Staff were reminded of the requirement in an email from the PREA Coordinator. The email was provided as documentation of the correction and uploaded to the supplemental folder.

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-b) KDOC 14.7 Sexual Abuse Prevention policy states “All facilities shall conduct a review, ordinarily within thirty (30) days, of the conclusion of every sexual abuse investigation unless the allegation was determined to be unfounded.” Core Civic LAC policy 14-07-01 states “The Warden will ensure that a post investigation review of a sexual abuse incident is conducted at the conclusion of every sexual abuse investigation, unless the allegation has been determined to be unfounded.” “Such review shall ordinarily occur within thirty (30) days of the conclusion of the investigation.” Document Review – LAC completed eight sexual abuse investigations that had outcomes of either substantiated or unsubstantiated during the review period and required an incident review. Seven of the eight Sexual Abuse Incident Review forms document a review that was completed within 30 days of the investigation closing date. One review was completed beyond 30 days from the close of the investigation. The current PCM discovered the review was missed and had the team complete the review. The incident reviews ordinarily occurred within 30 days of the investigation completion. c) KDOC 14.7 Sexual Abuse Prevention policy states “The review team shall consist of upper-level management officials with input from line supervisors, investigators, and medical or mental health practitioners.” Core Civic LAC policy 14-07-01 states “In addition to the Warden, the incident review team shall include upper-level facility management and the facility SART, with input from line supervisors, investigators, and medical or mental health practitioners.” Warden Interview – The Warden said each sexual abuse investigation is reviewed by a team that consists of the investigator, PCM/Assistant Warden, medical staff, mental health staff, Unit Manager. Document Review – All eight reviews documented a review team that consisted of the PCM, Upper Level management, Line Supervisors, Investigator, and medical or mental health. d-e) Core Civic LAC policy 14-07-01 states “Sexual Abuse Prevention policy states “The review team shall: 1. Consider whether the allegation or investigation indicated a need to revise policies or practices to better prevent, detect or respond to sexual abuse. 2. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender or intersex identification, status, or perceived status; gang affiliation; or was motivated or otherwise caused by other

	group dynamics at the facility. 3. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse. 4. Assess the adequacy of staffing levels in that area during different shifts. 5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff. All findings and recommendations for improvement will be documented on the Kentucky Department of Corrections Sexual Abuse Incident Review Report and the CoreCivic 14-7-1F Sexual Abuse Incident Review Report. Completed 14-7-1F forms will be maintained in the investigative file and forwarded to the Warden, the facility PREA Compliance Manager, and the FSC PREA Coordinator." Warden Interview – The Warden said the review teams looks at that may have contributed to the incident, staffing patterns, video camera availability, and who was involved. PCM Interview – The PCM said the incident review team reviews the investigation to see that it was prompt, thorough and properly documented. They review all evidence such as video, interviews, staffing, whether the victim was transgender, gay, bisexual or gender non-conforming. The review is documented on a form and provided to the Warden. Incident Review Team Interview – A Unit Manager was one member of the incident review team interviewed. She said the review team reviews all information involved in the investigation. They look at video evidence, staffing patterns, classification history of inmates involved, the history of the perp and victim. They also review the retaliation monitoring, notice of outcome and referral to mental health. The review is documented on a form and sent to the Warden for approval and then sent to the PREA Coordinator. She said if the team has recommendations for changes in policy, video monitoring or modifications for a blind spot, it is documented on the form. Document review – The eight Sexual Abuse Incident Reviews covered all five areas separately required by the standard on a form that is signed by all members. The form includes any recommendations from the review team and approval or denial by the Warden. If the recommendation is not approved, a space is provided for the Warden to document the reason for not implementing the recommendation. Based on the information from interviews, policies and documents reviewed, it has been determined the facility demonstrated substantial compliance with all provisions of the standard.

115.87	**Data collection**

Auditor Overall Determination: Meets Standard

Auditor Discussion

a) KDOC 14.7 Sexual Abuse Prevention policy states "Data shall be collected for every allegation of sexual abuse using the PREA investigating screens in KOMS designed to contain the data necessary to answer all questions for the Survey of Sexual Violence requested annually from the Department of Justice for the set of definitions established in 28 C.F.R.§115.5 and 28 C.F.R.§115.6. All data collected shall be securely retained."

Core Civic LAC policy 14-07-01 states "The facility will ensure that all Incident Reports on all allegations of Sexual Abuse and Sexual Harassment are forwarded electronically to the CoreCivic PREA Coordinator and appropriate FSC staff."

PREA Coordinator Interview – The CoreCivic PREA Coordinator said Lee Adjustment Center collects incident based data through the KDOC KOMS program under the contract with KDOC. CoreCivic has its own incident collection system, but LAC does not use it. She said the facility still provides the information to her from the KOMS reports for use in completing the CoreCivic annual PREA report and the SSV report for DOJ, if requested.

b-c) KDOC 14.7 Sexual Abuse Prevention policy states "Each facility shall document the number of allegations, completed investigations, Sexual Abuse Incident Reviews, offender notifications and outside SANE or SAFE exams on a monthly report. The monthly report shall be submitted monthly to the central office PREA Coordinator along with the facilities tracking spreadsheet."

A review of the CoreCivic PREA webpage at https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea found the CoreCivic PREA Annual Reports from 2013 to 2024. The annual reports compared the current year's data to previous years.

d) CoreCivic policy 14-7-01 states "All case records associated with claims of sexual abuse, including incident reports, investigative reports, offender information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling shall be retained in accordance with CoreCivic Policy 1-15 Retention of Records and the Kentucky Department of Corrections Record Retention Schedule."

The incident-based data is collected in KOMS investigations. Each investigation file reviewed included the incident data. The data collected was found to be the same as the data necessary to complete the annual SSV incident forms.

f) CoreCivic policy 14-2 states "Upon request, CoreCivic shall provide all such data from the previous calendar year to the Department of Justice no later than June 30th or at a date requested by that Department."

PREA Coordinator Interview – The CoreCivic PREA Coordinator said the Department of Justice requested a Survey of Sexual Victimization for LAC 2024 data since the last

	the last audit. She provided the SSV summary for review. Based on the information from interviews, policies and documents reviewed, the facility meets all provisions of this standard.

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) CoreCivic policy 14-2 states "The FSC PREA Coordinator shall review all aggregated sexual abuse data collected in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, to include Identifying problem areas and taking corrective action on an ongoing basis." Document Review – The CoreCivic Annual PREA Report for 2024 was provided for review. The report includes information about identified problem areas and corrective actions. The CoreCivic PREA Annual Reports from 2013 to 2024 were found on the CoreCivic PREA webpage at https://www.corecivic.com/the-prison-rape-elimination-a-ct-of-2003-prea. Agency Head Interview – The CoreCivic Vice President said PREA data is reviewed on a regular basis and compiled in an annual report. He reviews and approves the annual report. The PREA Coordinator said she gathers PREA data from the facilities and combines it in an annual CoreCivic PREA Report that is posted on the CoreCivic website. The report is used to assess and improve the PREA program. PREA Compliance Manager Interview - The PREA Compliance Manager at LAC said the PREA incident data is entered into the Incident Reporting Database as well as the KOMS for the KDOC. All sexual abuse incident reviews are sent to the CoreCivic PREA Coordinator for review. Information for the PREA annual report can be gathered from the IRD and incident reviews. He also provides a PREA annual report to the PREA Coordinator for LAC that summarizes PREA incidents and investigations for the year. Identified corrective actions from the sexual abuse incident reviews are provided in the report as well. b) CoreCivic policy 14-2 states "CoreCivic will prepare an annual report of its findings and corrective actions for each facility, as well as the agency as a whole. Such report shall include a comparison of the current year's aggregated data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse." Document Review – The CoreCivic Annual PREA Reports for 2024 was provided for

	review. The annual report compared the current year's data to previous years for all CoreCivic facilities and summarized corrective actions from each facility and the agency. The CoreCivic PREA Annual Reports were found on the CoreCivic website at https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea. c) CoreCivic CCDF policy 14-2 states "The CoreCivic Annual report shall be approved by the company Chief Corrections Officer and made available to the public through the CoreCivic website." Agency Head Interview – The CoreCivic Vice President said PREA data is reviewed on a regular basis and compiled in an annual report. He reviews and approves the annual report. Document Review – The CoreCivic Annual PREA Reports for 2024 was provided for review. The report was signed by the Vice President. No personal identifying information was found in the report. d) CoreCivic policy 14-2 states "Specific material may be redacted from the reports when publication would present a clear and specific threat to the safety and security of a facility, but the nature of the material redacted must be indicated." Interview – The PREA Coordinator said the annual report does not include the identity or personal and medical information for inmates or staff. A review of the CoreCivic webpage https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea found PREA Annual Reports from 2013 to 2024. Based on the information from interviews, policies and documents reviewed, the facility meets all provisions of this standard.

115.89	**Data storage, publication, and destruction**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) CoreCivic policy 14-2 states "All case records associated with claims of sexual abuse, including incident reports, investigative reports, inmate/detainee information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling shall be retained in accordance with CoreCivic Policy 1-15 Retention of Records." PREA Coordinator Interview – The PREA Coordinator said files and information from investigations are retained in the IRD Incident Report Database. The IRD is a secure database with limited access to authorized staff. Tour Observation – During the tour of the administration office area, the PREA Compliance Manager's office was visited. A locked filing cabinet was observed that

contained the records for PREA incidents.

b) CoreCivic policy 14-2 states "The CoreCivic Annual report shall be approved by the company Chief Corrections Officer and made available to the public through the CoreCivic website."

Document Review – The CoreCivic Annual PREA Report for 2024 was provided for review. These report was found on the CoreCivic website at https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea.

c) CoreCivic policy 14-2 states "Before making aggregated sexual abuse data publicly available, CoreCivic shall remove all personal identifiers."

Document Review – The CoreCivic Annual PREA Report for 2024 was provided for review. No personal identifiers were found on the report.

d) CoreCivic policy 14-2 states "The agency shall 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."

A review of the CoreCivic webpage https://www.corecivic.com/the-prison-rape-elimination-act-of-2003-prea found PREA Annual Reports for more than ten years to 2013.

Based on the information from interviews, policies and documents reviewed, the facility meets all provisions of this standard.

115.401 Frequency and scope of audits

Auditor Overall Determination: Meets Standard

Auditor Discussion

a) CoreCivic policy 14-12 states "Each CoreCivic facility shall be audited at least once in each PREA Audit cycle by a certified PREA Auditor external to CoreCivic to ensure compliance with the PREA National Standards. The FSC PREA Coordinator shall coordinate and schedule all external audits in coordination with the KDOC PREA Coordinator."

A review of the CoreCivic webpage for Lee Adjustment Center at https://www.corecivic.com/facilities/lee-adjustment-center found three PREA audit reports posted for 2015, 2020 and 2023.

b) PREA Coordinator Interview - CoreCivic has been receiving audits in its facilities every year since 2014. The PREA Coordinator said CoreCivic attempts to have one-third of its facilities audited each year, however the clients may make changes to their audit schedule that prevents CoreCivic from meeting that goal. A state DOC could move the CoreCivic facility audit to correct the state's one-third

	goal. This is out of CoreCivic's control. h) This auditor was allowed access to all areas of the facility during the facility tour. i) This auditor was provided with all documents requested, either electronic or hard copy. m) This auditor was allowed to interview inmates in a private area during the onsite audit. n) Inmates were allowed to send confidential correspondence to this auditor.

115.403	**Audit contents and findings**
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	f) PREA Coordinator Interview - CoreCivic has been receiving audits in its facilities every year since 2014. The PREA Coordinator said CoreCivic attempts to have one-third of its facilities audited each year, however the clients may make changes to their audit schedule that prevents CoreCivic from meeting that goal. A state DOC could move the CoreCivic facility audit to correct the state's one-third goal. This is out of CoreCivic's control. A review of the CoreCivic webpage for Lee Adjustment Center at https://www.corecivic.com/facilities/lee-adjustment-center found three PREA audit reports posted for 2015, 2020 and 2023.

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

	facility does not have female inmates.)	
115.15 (c)	**Limits to cross-gender viewing and searches**	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	na
115.15 (d)	**Limits to cross-gender viewing and searches**	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	**Limits to cross-gender viewing and searches**	
	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.)	na
115.18 (b)	**Upgrades to facilities and technologies**	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency’s ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.21 (a)	**Evidence protocol and forensic medical examinations**	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the	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.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	**Evidence protocol and forensic medical examinations**	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	**Evidence protocol and forensic medical examinations**	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes

	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	**Evidence protocol and forensic medical examinations**	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	**Evidence protocol and forensic medical examinations**	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.21 (h)	**Evidence protocol and forensic medical examinations**	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	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).)	yes
115.31 (a)	**Employee training**	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	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.)	yes
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.)	na
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	**Screening for risk of victimization and abusiveness**	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	**Screening for risk of victimization and abusiveness**	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	**Screening for risk of victimization and abusiveness**	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.41 (d)	**Screening for risk of victimization and abusiveness**	
	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?	no
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.)	na
115.51 (c)	**Inmate reporting**	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	**Inmate reporting**	

	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	**Exhaustion of administrative remedies**	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.52 (b)	**Exhaustion of administrative remedies**	
	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.)	na
	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.)	na
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.)	na
	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.)	na
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.)	na
	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,	na

	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.)	na
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.)	na
	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.)	na
	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.)	na
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.)	na
	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.).	na
	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.)	na
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days?	na

	(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.)	na
	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.)	na
	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.)	na
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.)	na
115.53 (a)	**Inmate access to outside confidential support services**	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	na
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	**Inmate access to outside confidential support services**	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	**Inmate access to outside confidential support services**	
	Does the agency maintain or attempt to enter into memoranda of	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.)	yes
115.73 (c)	**Reporting to inmates**	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has	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?	no
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).	na
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.)	na
115.83 (e)	**Ongoing medical and mental health care for sexual abuse victims and abusers**	
	If pregnancy results from the conduct described in paragraph §	na

	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.)	yes
115.86 (a)	**Sexual abuse incident reviews**	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	**Sexual abuse incident reviews**	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	**Sexual abuse incident reviews**	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	**Sexual abuse incident reviews**	

	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology 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.)	na
115.87 (f)	**Data collection**	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	**Data review for corrective action**	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.88 (b)	**Data review for corrective action**	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	**Data review for corrective action**	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
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