

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of facility:		FCC-Oakdale	
Physical address:		2105 East Whatley Road Oakdale, LA 71463	
Date report submitted:		October 23, 2014	
Auditor Information		Bruce L. Denny	
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Date of facility visit:		September 9-11, 2014	
Facility Information			
Facility mailing address: <i>(if different from above)</i>			
Telephone number:		318-335-4466	
The facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input checked="" type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
Name of PREA Compliance Manager:		Angel L. Adan, Associate Warden	Title: Associate Warden & PREA Coordinator
Email address:		aadan@bop.gov	Telephone number: 318-335-4070
Agency Information			
Name of agency:		Federal Bureau of Prison	
Governing authority or parent agency: <i>(if applicable)</i>		United States Department of Justice	
Physical address:		320 First Street NW, Washington, DC 20534	
Mailing address: <i>(if different from above)</i>			
Telephone number:		202-307-3198	
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Agency-Wide PREA Coordinator			
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AUDIT FINDINGS

NARRATIVE:

On September 9 through September 11, 2014, an audit was conducted of FCC-Oakdale.

A complete tour of the facility was conducted on September 9-10, 2014. All areas of the facility and operations were visited and observed.

Documents reviewed for this audit included: policy, institutional supplement, contracts, staff training records, personnel files, volunteer training records, sexual abuse and harassment complaints, and training curriculums. Formal interviews were scheduled through random selection of staff and offenders. All required interviews with staff and offenders were completed.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Federal Correctional Complex (FCC) is located in central Louisiana, Allen Parish, approximately 47 miles south of Alexandria, Louisiana. The complex consists of the Federal Correctional Institution (FCI) a low security component, Federal Detention Center (FDC), a low security component, and Satellite Prison Camp (SPC), a minimum security component. The mission of the facility is very complex and demanding; yet, the facility is well managed, clean, and well maintained. The complex has a seasoned staff with a great deal of experience in correctional practices. The executive staff manages all components of the complex and many staff have responsibilities in multiple locations at the facilities that make up the complex.

The Federal Correctional Institution is a low security institution that houses adult male offenders who have been convicted of federal crimes. There are four housing units inside the 43 acre secure perimeter of the institution which houses approximately 1425 federal offenders. The housing units use a variety of configurations. Some of the units have two-man cells; others have six-man mini-dorms. The 64 cell Special Housing Unit (SHU) was constructed and became operational on January 2, 1989. Generally, the cells in SHU are occupied by two offenders, but single cells are available when needed.

The FCI is a secure unit with a double fencing system augmented by multiple layers of razor ribbon and an alarm system. Two armed security patrols operate 24-hour per day. Both secure compounds utilize extensive video surveillance.

The Federal Detention Center, the second facility built on the Complex grounds, is a low security institution that houses adult male offenders who have been convicted of federal crimes. The FDC was dedicated on April 10, 1990. Its original mission was to provide a centralized location for the Bureau of Immigration and Customs Enforcement to house sentenced aliens convicted of crimes in local, state, and federal jurisdiction, as well as those who have completed their sentences and are awaiting hearings and/or deportation. In November of 2013 the mission was changed and now houses designated sentenced offenders only. The FDC is located adjacent to the FCI, on a 100 acre site that includes the Federal Prison Camp (SCP) and has 30 acres inside the secure perimeter. The secure perimeter at the FDC consists of a double fence with man barrier wire, and an electronic alarm system. The security of

the perimeter is supplemented by armed perimeter patrol vehicles. The FDC has three housing units inside the secure perimeter of the institution that house approximately 844 offenders.

Each of the L-shaped housing areas at the FDC have two pods with 168 beds in 84 cells. Each pod is configured in a mezzanine upper and lower construction. Each cell has a large window with a view to the outside, lockers, chairs, bulletin board, toilet, lavatory and mirror, and a place to hang up clothing. Each Pod has ten showers, three television rooms, and emergency exits. Skylights provide windows for the dayrooms. The 64 cell-128 bed Special Housing Unit is available for those at the FDC, but also is used to house offenders from other BOP facilities. The SHU has four (six man) exercise areas for SHU offenders which provide for recreation/exercise 5 days a week. The SHU also contains a recreational library, law library, laundry, and food service area.

In November of 1993, the Federal Prison Camp (SPC), the third facility built at the complex, was dedicated as a satellite facility to house approximately 175 minimum security offenders. Offender housing is available in two housing pods with 144 beds in a dormitory fashion and with 36 bunk beds in each pod. Also, there are 2 additional living areas consisting of a 21 man room consisting of triple bunks and a 10 man room consisting of double bunks. In addition, the facility provides a full service kitchen, a dining room, outdoor eating area, visiting room, a chapel, library, and medical clinic.

Offenders housed at the SCP provide a stable workforce throughout the complex in areas such as food service, mechanical services, and landscape. Offenders also perform community service projects in the local communities.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 2

Number of standards met: 40

Number of standards not met: 0

Number of standards not applicable 1

Standard number here	§115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

All offenders at FCC Oakdale receive a comprehensive presentation on the Sexuality Abuse Behavior Prevention and Intervention Program during the admission and orientation program. They also receive an associated pamphlet from Central Office. All offenders are made aware the BOP has a zero tolerance policy regarding sexual abuse and sexual harassment, and they have the right to be free from retaliation for reporting such incidents. Offenders are educated on definitions of sexually abusive behavior; prevention strategies to minimize risk of sexual victimization while in BOP custody; methods of reporting an incident of sexually abusive behavior against oneself, and for reporting allegations of sexually abusive behavior involving other offenders, to include reporting procedures directly to regional staff, or to an outside agency if desired; treatment options and programs available to offender victims of sexually abusive behavior; and the monitoring, discipline, and/or prosecution of sexual perpetrators.

At the beginning of each shift, a recorded message plays over the intercom informing offenders of Oakdale's Zero Tolerance Policy on sexual abuse and harassment. This message is played in both English and Spanish.

Standard number here **§115.12 - Contracting with other entities for the confinement of inmates**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

The agency does contract with other entities for the confinement of offenders and has a contract monitor. The contracts were discussed and reviewed to ensure the private facilities adopted and complied with PREA standards, and provided for monitoring compliance with PREA standards.

Standard number here **§115.13 – Supervision and Monitoring**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

As of September 3, 2013, a total of 131 additional cameras, 79 to the FCI and 52 to the FDC had been added to the complex since August 20, 2012. Monitoring deters sexually abusive behavior so the offenders are protected as a result of the additional surveillance. The offenders' privacy is further protected by the use of a buzzer for alerting when opposite gender are on the unit.

Standard number here **§115.14 – Youthful Inmates**

Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

X This standard is not applicable as the complex does not house youthful offenders.

Standard number here **§115.15 – Limits to Cross-Gender Viewing and Searches**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. No cross gender strip searches have been conducted. 115.5 (b) does not go into effect until 2015.

Standard **§115.16 – Inmates with Disabilities and Inmates who are Limited**

number here **English Proficient**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

The facility ensures that offenders with disabilities and offenders with limited English skills have an opportunity to engage in or benefit from the agency's efforts to eliminate sexual abuse or harassment.

Standard number here **§115.17 – Hiring and Promotion Decisions**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

The agency does not allow hiring of anyone who has been convicted of sexual abuse in a prison or jail. Appropriate background checks are done on all employees, contractors, and volunteers. PS 5324.11 Sexual Abusive Behavior Prevention and Intervention Program addresses this standard. Verified via interviews and documentation.

Standard number here **§115.18 – Upgrades to Facilities and Technology**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

As of September 3, 2013, a total of 131 additional cameras, 79 to the FCI and 52 to the FDC had been added to the complex since August 20, 2012. Monitoring deters sexually abusive behavior so the inmates are protected as a result of the additional surveillance. The inmates' privacy is further protected by the use of a buzzer for alerting when opposite gender are on the unit.

Standard number here **§115.21 – Evidence Protocol and Forensic Medical Examinations**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

FCC Oakdale has current agreements with both Lake Charles Memorial Hospital and Mamou Savoy Hospital to conduct SAFE/SANE evaluations. The facility has also entered into a gratuitous services agreement with St. Laundry-Evangeline Sexual Assault Center to provide crisis counseling services and victim advocacy services. FCC Oakdale employs four licensed psychologists, all of whom are qualified through rigorous training and continuing education to provide supportive counseling following trauma. Finally, all staff have access to outlines of

first responder responsibilities on the Sallyport web page and through laminated "pocket cards" provided by the institution.

Standard number here **§115.22 – Policies to Ensure Referrals of Allegations for Investigations**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

5324.11 Sexual Abusive Behavior Prevention and Intervention Program addresses this standard.

Standard number here **§115.31 – Employee Training**

X Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

All staff received training on preventing Sexual Abusive Behavior and also on PREA during annual training. Psychology staff provided extensive training on PREA to all staff.

Standard number here **§115.32– Volunteer and Contractor Training**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Volunteers and contractors receive the same training on preventing Sexual Abuse Behavior and PREA as regular staff members. Psychology staff provided extensive training on PREA to all staff.

Standard number here **§115.33 – Inmate Education**

X Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. Interviews with staff confirm that substantial efforts are made to ensure all offenders have received the training. Interviews with offenders confirm they were aware of the posters throughout the facility and access via the TRULINCS (electronic messaging system for offender) making them aware of this resource.

Standard number here **§115.34 – Specialized Training: Investigations**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

All of FCC Oakdale staff have received additional training on investigations by completing an National Institute of Corrections training (beyond their BOP trainings).

Standard number here **§115.35 – Specialized training: Medical and mental health care**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Medical and mental health staff completed training on the following topics: PREA and Medical and Mental Health Care: A Trauma-Informed Approach; PREA Specialty Training: Module 1 Detecting and Assessing Signs of Sexual Abuse and Harassment; PREA Specialty Training Module 2: Preserving Physical Evidence; PREA Specialty Training Module 3: Effective and Professional Responses; PREA Specialty Training Module 4: Reporting and the PREA Standards; and Why PREA Matters: Understanding Sexual Trauma in Custody.

The Chief Psychologist has provided additional training for Mental Health Staff during Psychology Department meetings and also during Health Services Department meetings.

Standard number here **§115.41 – Screening for Risk of Victimization and Abusiveness**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Offenders receive screening for risk of victimization and abusiveness the same day of their arrival by both Correctional Systems Staff and Unit Team Staff. All newly designated offenders receive an individualized intake screening by a psychologist, who also screens for risk of victimization and abusiveness.

Standard number here **§115.42 – Use of Screening Information**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Offenders identified at risk for victimization or abusiveness are included in the weekly SIS report discussed during the Special Housing Unit Meeting. This ensures that investigative staff, health services, staff, psychology staff, and unit team staff can provide input.

Standard number here **§115.43 – Protective Custody**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

At the time of the audit, there had been no allegations which would bring this standard in to play. Interview with staff confirm that they are aware of appropriate and inappropriate use of protective custody.

Standard number here **§115.51 – Inmate Reporting**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. At the beginning of each shift, the Control Center plays a recorded message over the intercom informing offenders of Oakdale’s Zero Tolerance Policy on sexual abuse and harassment. This message is played in both English and Spanish. The message also includes various methods of how to behavior. Interviews confirmed offenders are aware of multiple ways to report privately report incidents of sexually abusive

Standard number here **§115.52 – Exhaustion of Administrative Remedies**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Notices are posted in all departments and in all units providing a method of reporting sexual abuse outside of the local institution. This is addressed in Program Statements.

Standard number here **§115.53 – Inmate Access to Outside Confidential Support Services**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Psychology staff has arranged with local rape crisis services to provide the offenders with outside emotional support services related to sexual abuse (a list of agencies with contact information is located on the FCC Oakdale Menu Page PREA link). Offenders will be provided reasonable access to the agency’s victim advocates. The offenders will be informed that the allegation will be reported and that calls will be monitored. Psychology or Chaplaincy Services may also provide victim advocate services.

Offenders are also provided this information in the A & O handbook, specifically:

Counseling Programs for Victims of Sexually Abusive Behavior

Most people need help to recover from the emotional effects of sexually abusive behavior. If you are the victim of sexually abusive behavior, whether recent or in the past, you may seek counseling and/or advice from a psychologist or chaplain. Crisis counseling, coping skills, suicide prevention, mental health counseling, and spiritual counseling are all available to you.

Contact your local Rape Crisis Center (RCC): FCC Oakdale has a Memo of Understanding (MOU) with a local RCC. Psychology Services can provide you with the contact information for the hotline services or for victim advocacy accompaniment during the examination, or for counseling. There is a possibility these calls will be monitored. You may also seek assistance through Psychology Services.

Standard number here **§115.54 – Third-Party Reporting**

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

This has been confirmed via interview with offenders.

Standard number here **§115.61 – Staff and Agency Reporting Duties**

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

This issue is addressed in PS 5324.11 and was substantiated via interview with offenders and staff. All staff at FCC Oakdale have been provided with laminated pocket cards that outline first responder responsibilities. Interviews with random staff at all levels demonstrate they know what steps to take to protect offenders.

Standard number here **§115.62 – Agency Protection Duties**

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

All staff at FCC Oakdale have been provided with laminated pocket cards that outline first responder responsibilities. Interviews with random staff at all levels demonstrates they know what steps to take to protect offenders.

Standard number here **§115.63 – Reporting to Other Confinement Facilities**

- Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 outlines the procedures to take to respond to allegations that an offender was sexually abused while confined at another facility. Interviews with the warden, associate warden, and PREA Compliance Manager demonstrated they all know the procedure to follow.

Standard number here **§115.64 – Staff First Responder Duties**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 outlines the procedures to take to respond to allegations of sexual abuse for security as well as non-security staff. Interviews of all staff regardless of whether they were security or non-security showed staff knew what to do. Staff were aware of ensuring the offenders' safety as well as securing physical evidence to ensure it is not destroyed or contaminated.

Standard number here **§115.65 – Coordinated Response**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

The facility has a plan to coordinate actions to be taken in response to an incident of reported sexual abuse among staff first responders, medical, mental health, practitioners, investigators, and facility leadership.

Standard number here **§115.66 – Preservation of ability to protect inmates from contact with abusers**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Standard number here **§115.67 – Agency protection against retaliation**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

A system is in place for monitoring retaliation. At the time of the audit, there had been no sexual abuse allegations.

Standard number here **§115.68 – Post-Allegation Protective Custody**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. To date, segregation has not been used to protect any offender concerning sexual allegations.

Standard number here **§115.71 – Criminal and Administrative Agency Investigations**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. 115.71(k) A review of the Domestic Investigations and Operational Guide for the FBI, 2011 demonstrates that FBI agents have training and guidelines in accordance with investigations. OIG training for PREA was implemented in January of 2014. To date, the facility has not had any incidents warranting investigation by the FBI or OIG concern a complaint regarding sexual abuse.

Standard number here **§115.72 – Evidentiary Standard for Administrative Investigations**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 outlines that a preponderance of the evidence is the standard to be used when or if allegations are substantiated. Confirmed during interview with the facility investigator.

Standard number here **§115.73 – Reporting to Inmate**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. A review of the records demonstrate compliance.

Standard number here **§115.76 – Disciplinary sanctions for staff**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 Sexual Abusive Behavior Prevention and Intervention Program addresses this standard.

Standard number here **§115.77 – Corrective action for contractors and volunteers**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 3420.11 outlines employees code of conduct and also applies to contractors and volunteers.

Standard number here **§115.78 – Disciplinary sanctions for inmates**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

This standard is addressed in PS 5324.11 and PS 5270.11. Offender on offender sexual conduct (not forced) will result in an incident report. This report results in a disciplinary hearing being conducted on the offenders. Staff and offender sexual activity will be subject to disciplinary action and/or criminal prosecution.

Standard number here **§115.81 – Medical and mental health screenings; history of sexual abuse**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. Verified via offender interviews and documentation.

Standard number here **§115.82 – Access to emergency medical and mental health services**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Verified via interviews and documentation; this issue is addressed in PS 5324.11.

Standard number here **§115.83 – Ongoing medical and mental health care for sexual abuse victims and abusers**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard.

Standard number here **§115.86 – Sexual abuse incident reviews**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. Offenders will be offered medical and mental health evaluations to those who were sexually abused including follow-up services. This was confirmed by interviews with Medical and Mental Health staff.

Standard number here **§115.87 – Data Collection**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. Data is collected from several sources. The main source is the TRUINEL system. The PREA Coordinator has access to information in TRUINEL.

Standard number here **§115.88 – Data Review for Corrective Action**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

The Annual Report covers the period from August 2012 to December 2012.

Standard number here **§115.89 – Data Storage, Publication, and Destruction**

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

PS 5324.11 addresses this standard. Data is strictly controlled throughout the agency.

AUDITOR CERTIFICATION:

The auditor certifies that the contents of the report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.

/s/

Bruce L. Denny

Auditor Signature

Date October 23, 2014