

PREA Facility Audit Report: Final

Name of Facility: Regional Brig Marine Corps Installations East

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 11/15/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Jodi L Upshaw	Date of Signature: 11/15/2024

AUDITOR INFORMATION	
Auditor name:	Upshaw, Jodi
Email:	upshawjodi@hotmail.com
Start Date of On-Site Audit:	09/24/2024
End Date of On-Site Audit:	09/26/2024

FACILITY INFORMATION	
Facility name:	Regional Brig Marine Corps Installations East
Facility physical address:	1039 Duncan Street, Camp Lejeune, North Carolina - 28547
Facility mailing address:	

Primary Contact

Name:	Gene Rued
Email Address:	gene.rued@usmc.mil
Telephone Number:	910-451-7457

Warden/Jail Administrator/Sheriff/Director	
Name:	CWO4 De la Rosa, Johnny
Email Address:	johnny.d.delarosa.mil@usmc.mil
Telephone Number:	910-451-7459

Facility PREA Compliance Manager	
Name:	Gene Rued
Email Address:	gene.rued@usmc.mil
Telephone Number:	(910) 451-7457

Facility Health Service Administrator On-site	
Name:	LCMDR Love, AMber
Email Address:	amber.l.love11.mil@health.mil
Telephone Number:	910-451-1834

Facility Characteristics	
Designed facility capacity:	60
Current population of facility:	27
Average daily population for the past 12 months:	42
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Mens/boys

<p>Which population(s) does the facility hold? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)</p>	
<p>Age range of population:</p>	18-47
<p>Facility security levels/inmate custody levels:</p>	Level I - 1 year (MDO, MED, MAX)
<p>Does the facility hold youthful inmates?</p>	No
<p>Number of staff currently employed at the facility who may have contact with inmates:</p>	98
<p>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</p>	18
<p>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</p>	18

AGENCY INFORMATION	
Name of agency:	United States Marine Corps
Governing authority or parent agency (if applicable):	
Physical Address:	3000 Marine Corps Pentagon, Room 2C253, Washington, Dist. Columbia - 20350
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:

Name:	Chief Warrant Officer 4 Karen Dymora
Email Address:	karen.dymora@usmc.mil
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Juan Quintero	Email Address:	juan.quintero@usmc.mil

Facility AUDIT FINDINGS	
Summary of Audit Findings	
<p>The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.</p> <p>Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.</p>	
Number of standards exceeded:	
3	<ul style="list-style-type: none"> • 115.15 - Limits to cross-gender viewing and searches • 115.32 - Volunteer and contractor training • 115.33 - Inmate education
Number of standards met:	
42	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-09-24
2. End date of the onsite portion of the audit:	2024-09-26

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?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Interviewed a victim advocate at SAPR to verify services provided to the facility.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	60
15. Average daily population for the past 12 months:	42
16. Number of inmate/resident/detainee housing units:	2
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	27
19. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
20. 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
21. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
22. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
23. 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
24. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	0

<p>25. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>26. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>27. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>28. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>During the onsite review there were no prisoners to interview that were disabled, identified as LGBTQI, disclosed prior sexual victimization during the risk assessment, or reported an incident.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>30. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>98</p>
<p>31. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>0</p>

<p>32. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>2</p>
<p>33. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>On the first day of the onsite review there were two (2) food service contractors that entered the facility.</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>11</p>
<p>35. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p> <input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p>
<p>36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>I randomly selected prisoners from the facility roster for age, race, ethnicity, length of time at the facility, and housing assignment.</p>
<p>37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>

38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	There were no specialized prisoners to interview during the onsite and interviews with random prisoners were oversampled.
Targeted Inmate/Resident/Detainee Interviews	
39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	0
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
40. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p>40. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Due to military entrance requirements applicants must be English proficient for entrance on duty.</p>
<p>41. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>41. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>41. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Due to military entrance requirements applicants must meet minimum physical standards for entrance on duty.</p>
<p>42. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>42. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>42. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Due to military entrance requirements applicants must meet minimum physical standards for entrance on duty.</p>
<p>43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>43. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>43. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Due to military entrance requirements applicants must meet minimum physical standards for entrance on duty.</p>
<p>44. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>44. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>44. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Due to military entrance requirements applicants must be English proficient for entrance on duty.</p>
<p>45. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>45. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>45. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Review of eleven (11) intake risk assessments and interviews with eleven (11) prisoners confirmed that none identified as lesbian, gay, bisexual, transgender or intersex.</p>
<p>46. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>

<p>46. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>46. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Review of eleven (11) intake risk assessments and interviews with eleven (11) prisoners confirmed that none identified as transgender or intersex.</p>
<p>47. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>47. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>47. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Review of eleven (11) intake risk assessments and interviews with eleven (11) prisoners confirmed that none reported a sexual abuse.</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>

<p>48. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>48. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Review of eleven (11) intake risk assessments and interviews with eleven (11) prisoners confirmed that none disclosed prior sexual victimization.</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>49. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Review of eleven (11) prisoner files and interviews with eleven (11) prisoners confirmed that none were placed or ever placed in segregated housing for risk of sexual victimization.</p>

<p>50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>During the onsite review, random prisoners were oversampled due to no targeted prisoners being housed at the facility.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>51. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>5</p>
<p>52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>If "Other," describe:</p>	<p>Random selection choices included male and female staff that were assigned to each shift.</p>
<p>53. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>54. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>There were no barriers in completing staff interviews.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	

<p>55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>8</p>
<p>56. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>58. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>59. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

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

<p>63. Provide any additional comments regarding selecting or interviewing specialized staff.</p>	<p>The Brig is small facility and some staff were assigned numerous job duties which resulted in several staff being interviewed under several protocols.</p>
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SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

<p>64. Did you have access to all areas of the facility?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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Was the site review an active, inquiring process that included the following:

<p>65. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>66. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>67. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>68. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>69. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>The Auditor was provided access to all areas of the facility, tested prisoner telephones and the grievance process.</p>
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Documentation Sampling

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

<p>70. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>71. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>Staff were randomly selected for interview and then file reviews were completed on those selected.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

72. 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	1	1	X	X
Staff-on-inmate sexual abuse	0	0	0	0
Total	1	1	0	0

72. Explain why this information could not be provided.

There was one case that involved prisoner on prisoner sexual abuse. The case is currently pending criminal investigation with NCIS.

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

74. 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	1	X	X	X	X
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	1	X	X	X	X

74. Explain why this information could not be provided.

There was one case that involved prisoner on prisoner sexual abuse. The case is currently pending criminal investigation with NCIS.

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

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

75. Explain why this information could not be provided.

There was one case that involved prisoner on prisoner sexual abuse. The case is currently pending criminal investigation with NCIS.

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.

76. 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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

78. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	1
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<p>79. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>81. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>82. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>1</p>
<p>87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>1</p>
<p>89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
91. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
92. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
93. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
94. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	One case is still pending investigation with NCIS and the outcome has not been determined. In 2024 there was a sexual misconduct investigation in which an administrative investigation determined the allegation to be unfounded.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
95. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input checked="" type="radio"/> Yes <input type="radio"/> No
95. Enter the TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS who provided assistance at any point during this audit:	1

Non-certified Support Staff

96. 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

97. Who paid you to conduct this audit?

The audited facility or its parent agency

My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

A third-party auditing entity (e.g., accreditation body, consulting firm)

Other

Identify the entity by name:

Creative Corrections

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Marine Corps Corrections Program (MCO) 1620.3B - V6 4. Headquarters Marine Corps Corrections Organizational Chart 5. MCIEAST Regional Brig Organizational Chart 6. Prison Rape Elimination Act (PREA) Coordinator Appointment Letter

7. Prison Rape Elimination Act (PREA) Compliance Manager Appointment Letter
8. Interviews Conducted: PREA Coordinator, PREA Compliance Manager
9. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility stated the agency has a written policy mandating zero-tolerance for all forms of sexual abuse and sexual harassment. The facility further states the policy outlines how it will implement the agency's approach to preventing, detecting and responding to sexual abuse and sexual harassment.

Provision (a):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures and MCO 1620.3B V6 states, "The Brig will maintain a zero-tolerance policy approach in all cases of sexual abuse, sexual harassment or sexual misconduct in accordance with the United States DOJ. Bureau of Justice Statistics, PREA Prisons and Jail Standards. The Brig will ensure its policies, procedures, and practices protect prisoners from all acts of sexual misconduct or harm. The Brig's policy governing PREA includes, at a minimum, the following areas: prevention planning, response planning, training and education. screening for risk of sexual victimization and abusiveness, reporting, official response following a report, investigations, discipline, and medical and mental health care." The facility has a written policy mandating zero-tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates. In addition, the policy outlines how MCIEAST Regional BRIG will implement the agency's approach to preventing, detection, and responding to sexual abuse and sexual harassment. Review of the policy confirmed it includes definitions for prohibited behaviors and sanctions for those found to have participated in those behaviors. The policy further describes strategies and responses to reduce and prevent sexual abuse and sexual harassment of inmates.

Provision (b):

Marine Corps Corrections Program (MCO) 1620.3B - V6 states, "The Head of Corrections shall appoint, in writing, an upper-level agency PREA coordinator with sufficient time and authority to develop, implement, and oversee Marine Corps Corrections Program efforts that comply with PREA standards in all Marine Corps MCFs." The facility provided and the Auditor reviewed the Headquarters Marine Corps Corrections Organizational Chart. Review of the chart confirmed the PREA Coordinator is the MCIEAST Regional BRIG Commanding Officer. Interview with the PREA Coordinator/Brig Commanding Officer confirmed he has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards at all facilities. The interview further confirmed he has direct access to the Marine Corps Corrections Head through the Marine Corps Corrections Deputy and Corrections Support Assistant.

Provision (c):

	<p>Marine Corps Corrections Program (MCO) 1620.3B - V6 states, "PREA Compliance Managers, provided with sufficient time and authority to coordinate MCF efforts to comply with the PREA standards, shall be appointed in writing by the MCF CO. The PREA Compliance Manager is a primary duty assignment of at least an E-6/GS-09 and is responsible to the MCF CO. Additionally, they shall be identified in the MCF organization chart and shall liaise with Law Enforcement, Investigations and Corrections Branch, MCICOM PREA Coordinator." MCIEAST Regional BRIG has employed a designated PREA Compliance Manager. Interview with the PREA Compliance Manager confirmed he has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. Review of the MCIEAST Regional BRIG organizational chart confirmed the PREA Coordinator reports to the BRIG Officer who reports to the Brig Commanding Officer.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Marine Corps Corrections Program (MCO) 1620.3B - V6 4. Memorandum of Understanding Between United States Marine Corps, Assistant Deputy 5. Commandant Plans, Policies, and Operations (Security) and Sheriff, New Hanover County, North Carolina 6. Interviews Conducted: Contract Administrator 7. Auditor Observations

	<p>Provision (a)(b):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “The Brig is not responsible for contracting as described in this standard. For the purposes of this standard, CMC DC I&L (Corrections) is responsible for contracting with agencies or other entities. The agency policy, reference (b), is used to show compliance with this standard during the conduct of PREA audits.” MCO 1620.3B V6 states, “For the purposes of this standard, Law Enforcement, Investigations and Corrections Branch, MCICOM is responsible for contracting with agencies or other entities. Any new, revised, or renewed agreement shall provide for the entity’s obligation to adopt and comply with the PREA standards and to provide for monitoring to ensure compliance with PREA standards.” MCIEAST Regional Brig contracts with one agency for the confinement of female prisoners.</p> <p>Review of the Memorandum of Understanding between the United States Marine Corps, Assistant Deputy Commandant Plans, Policies, and Operations (Security) and the Sheriff, New Hanover County, North Carolina confirmed the contract requires the New Hanover County Sheriff’s Office to adopt and comply with PREA standards and keep a copy of the facility’s most recent PREA audit. Review of New Hanover County Sheriff’s Office website (https://www.nhcgov.com/937/Prision-rape-Elimination-Act) confirmed an annual report was displayed to determine compliance with §115.88.</p> <p>Further research confirmed a PREA audit was conducted on January 10, 2024, with a final report submitted on April 7, 2024 (https://files.nc.gov/dac/documents/2024-05/Final). Monitoring is conducted through requirement both parties will ensure audits and other records pertinent to the agreement will be retained by each organization for at least three (3) years. Interview with the Agency Contract Administrator indicated MCIEAST Regional BRIG has one contract for the confinement of female prisoners. Contract monitoring is conducted through submission of reports by way of audits.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act

(PREA) Procedures

1. MCIEAST Regional BRIG PREA Staffing Plan for 2024 and 2023
2. Annual Review of Standard Operation Procedures 2021, 2022, and 2023
3. Samples of Intermediate-level or Higher-level Supervisor Unannounced Rounds
4. Interviews Conducted: BRIG Commanding Officer/PREA Coordinator, PREA Compliance

Manager, Intermediate-level or Higher-level Supervisors, Security Staff

5. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility stated the agency has developed, documents and makes its best effort to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable video monitoring, to protect inmates against sexual abuse. The facility reviews the staffing plan annually. Intermediate-level or Higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment that covers all shifts and the facility prohibits staff from alerting other staff that such rounds are occurring. In the last year the average daily population of MCIEAST Regional BRIG was fifty-two (52) prisoners and the staffing plan is based on the facility's rated capability of seventy-five (75) prisoners. There has not been any deviations to the staffing plan in the last year.

Provision (a):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Security Operations Chief, will develop. document. and make their best efforts to comply on a regular basis with a security staffing plan that provides for adequate levels of staffing. and where applicable. video monitoring, to protect prisoners against sexual abuse. The written staffing plan is developed sufficiently in advance for internal review and further submission to CMC DC J&L (Corrections) by 31 May, each calendar year. The staffing plan will conform to direction and allocations as directed by the Brig Officer (BO). In calculating adequate staffing levels and determining the need for video monitoring. the Brig will use the PREA staffing analysis in accordance with reference (d) and will take into consideration: Generally accepted detention and correctional practices; Any judicial findings of inadequacy; Any findings of inadequacy from Federal investigative agencies; Any findings of inadequacy from internal or external oversight bodies; All components of the brig's physical plant (including "blind-spots" or areas where staff

or prisoners may be isolated; The composition of the prisoner population; The number and placement of supervisory staff; Institution programs occurring on a particular shift; Any applicable regulations or standards; The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and Any relevant factors.”

The auditor reviewed the Brig’s 2023 and 2024 staffing plan which considered all elements of provision (a) of the standard. Interviews with the Brig Commanding Officer and PREA Compliance Manager confirmed the staffing plan is reviewed annually and considers all elements of provision (a). During the onsite audit, the Auditor observed adequate staffing levels in all areas of the facility.

Provision (b):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “In circumstances where the staffing plan is not complied with, the Duty Brig Supervisor (DBS) will document and justify all deviations from the plan in the daily morning report and notify the BO on weekends and holidays. The annual staffing plan review will analyze the causes and effects of the six most common reasons for deviation from the staffing plan and shall propose corrective actions or alternatives necessary to optimize the effectiveness and productivity of existing staff. The analysis will also take into consideration the average daily number of prisoners and the current staffing plan.” The facility listed several examples of when the Brig may have a deviation to the staffing plan; however, there were no deviations to document. The Auditor finds provision (b) not applicable.

Provision (c):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Whenever necessary. but not less than annually, the BO, in consultation with the MC DC I&L (Corrections) PREA Coordinator. will assess. determine. and document whether adjustments are needed for the following: The staffing plan established pursuant to paragraph (l) of this section; The Brig’s deployment of video monitoring systems and other monitoring technologies with regard to financial resources availability and architectural review boards; and The resources the Brig has available to ensure adherence to the staffing plan. Any requests for additional staff will be forwarded with justification to CMC DC I& L (Corrections).”

The auditor reviewed the 2023 and 2024 staffing plan signed by the Brig Commanding Officer and PREA Compliance Manager. During the annual reviews, the Brig considered whether adjustments were needed to the staffing plan and deployment of video monitoring systems to protect prisoners against sexual abuse.

	<p>Provision (d):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “The CO, BO, PREA Compliance Manager, Security Operations Chief, Staff NCO’s and Duty Brig Supervisors will conduct regular and random unannounced rounds to identify and deter staff and prisoner sexual abuse and sexual harassment. Such policy and practice shall be implemented for night shifts as well as day shifts. These rounds will be documented in the post logbooks with full entries and highlighted by a yellow marker both in GHY and RHU prisoner living areas. The daily DBS report should document these rounds and the times should match the logbook entries. Over time (weekly), the unannounced rounds will cover all shifts and all areas of the Brig. Staff members are prohibited from alerting other staff members that these supervisory rounds are occurring. unless such announcement is related to the legitimate operational functions of the Brig.”</p> <p>During the onsite review the Auditor observed logbooks in each housing unit. Annotated in the logbooks in yellow highlighter were supervisor unannounced rounds. Further review of the logbooks confirmed the rounds were conducted at random times and on each shift. Interview a higher-level staff member who conducts the rounds confirmed that they are completed once per shift and the times are random. Interviews with five (5) security officers confirmed that they are not allowed to notify other staff that these rounds are occurring.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act

(PREA) Procedures

3. Headquarters Marine Corps Corrections Organizational Chart
4. MCIEAST Regional Brig Organizational Chart
5. Prison Rape Elimination Act (PREA) Coordinator Appointment Letter
6. Prison Rape Elimination Act (PREA) Compliance Manager Appointment Letter
7. Interviews Conducted: PREA Coordinator, PREA Compliance Manager, Security Staff
8. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states that the Brig does not house youthful offenders.

Provisions (a)(b)(c):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states , "In the rare instance a prisoner under the age of 18 is confined. the DBS will comply with PREA standards pertaining to youthful prisoners and notify the BO as soon as possible but no later than the end of the shift. Prisoners under the age of 18 will be housed separately. Assignment to restrictive housing does not meet this standard. As a part of the separate housing assignment, prisoners will not be placed in a housing unit in which the prisoner will have sight, sound, or physical contact with any adult prisoner through use of a shared dayroom or other common space, shower area, or sleeping quarters. In areas outside of housing units, the facility will either: Maintain sight and sound separation between prisoners under 18 and adult prisoners, or Provide direct staff supervision (escort) when juveniles and adult prisoners have sight, sound, or physical contact. Video monitoring is considered indirect supervision, and is therefore not sufficient to comply with the standard of direct supervision. The Brig will make its best effort to avoid placing prisoners under 18 in isolation to comply with these provisions. Absent exigent circumstances, juveniles are permitted to participate in large-muscle exercises, any legally required special education services, program and work opportunities. For each instance where juveniles are denied the aforementioned requirements, the DBS shall document the exigent circumstances for the denial in each DBS Report."

Interviews with the Brig Commanding Officer, PREA Compliance Manager and random security staff confirmed the Brig does not house youthful offenders. Requirement to enter military service require the potential applicant to be of the age of majority, although parents may sign for an applicant to enter service prior to their 18th birthday, the age requirement will need to be met within a short amount of time following entrance on duty.

Conclusion:

Based upon review and analysis of all available evidence, the auditor has determined that this standard is not applicable to the Brig.

115.15	Limits to cross-gender viewing and searches
	<p data-bbox="256 188 991 221">Auditor Overall Determination: Exceeds Standard</p> <hr/> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1430 412">The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol data-bbox="256 524 1474 1151" style="list-style-type: none"> <li data-bbox="256 524 1123 557">1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) <li data-bbox="256 602 1406 669">2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act <li data-bbox="256 714 620 748">3. (PREA) Procedures <li data-bbox="256 792 1378 860">4. MCIEAST Regional Brig Frisk Searches on Transgender-Intersex Prisoners Signed Training Roster <li data-bbox="256 904 1458 972">5. Policy Letter 2-17 Conduct of Searches for Transgender and Intersex Prisoners within Marine Corps Confinement Facilities <li data-bbox="256 1016 1474 1084">6. Interviews Conducted: PREA Coordinator, PREA Compliance Manager, Random Security Staff, Random Prisoners <li data-bbox="256 1128 655 1162">7. Auditor Observations <p data-bbox="256 1263 1414 1386">In the Pre-Audit Questionnaire (PAQ), the facility stated they do not conduct cross gender strip searches or cross gender visual body cavity searches and have not conducted any in the past twelve (12) months.</p> <p data-bbox="256 1487 496 1520">Provisions (a)(c):</p> <p data-bbox="256 1565 1474 2058">MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states “Brig staff will not conduct cross-gender strip searches or cross-gender visual body cavity searches meaning a search of the anal/genital opening) except in exigent circumstances (to ensure safety or to preserve evidence) or when performed by medical practitioner in accordance with references (e) and (f). Body cavity searches are only performed by qualified medical personnel when authorized by the CO or designee. and only when there is a reasonable belief that a person is concealing contraband in or on their person in accordance with reference. All cross-gender strip searches will be annotated in the Brig Strip Search Log, Brig Log and DBS Report and prisoner medical record. These events will be identified as significant events in the Brig Log (e.g. highlighted, color coded, searchable, etc.). Cross-gender frisk searches of prisoners are not permitted except in exigent</p>

circumstances in accordance with reference (c). Cross-gender frisk searches will be documented in the Brig Log and identified as a significant event (e.g., highlighted, color coded, searchable. etc.) and annotated in the DBS report. The Brig only processes female prisoners in the Receiving and Release area and then transfers them to an approved County Jail for pre-trial or post-trial confinement.”

The Brig does not conduct cross gender strip searches or cross gender visual body cavity searches; therefore, no logs of these searches were available. The Brig does not house female prisoners. The Auditor reviewed Brig SOP which confirmed should one of these searches be conducted it would be documented. Interviews with female security staff confirmed that cross gender strip searches of male inmates would be documented but none have occurred. Interviews with eleven prisoners further confirmed they had not been strip searched by a female staff member.

Provision (b):

MCIEAST Regional BRIG does not house female offenders; therefore, this provision of the standard is not applicable.

Provision (d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Security staff will allow prisoners to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genital in except in exigent circumstances or when viewing is incidental to routine cell checks to include viewing via video cameras. Brig staff will announce their presence when entering a prisoner housing unit or area where prisoners or the opposite gender be located by loudly stating “MALE ON DECK” or “FEMALE ON DECK.” Brig staff should be aware of the Plan of the Day and, to the maximum extent possible, limit the number of official visits to dorms during recreation, shower call and times when prisoners are most susceptible to unauthorized viewing.”

Review of the Brig SOP confirmed it has policies in place that enable male prisoners to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. During the onsite review, the auditor reviewed signage on housing unit doors directing opposite gender to announce their presence prior to entry. During the onsite review the auditor heard opposite gender staff announcing themselves upon entry into housing units. Interviews with female security staff confirmed the announcement is made every time entry is made into a housing unit. Interviews with random prisoners

additionally confirmed they hear the opposite gender announcements, and they are being made several times a day. The Brig has a policy in place that during shower times female security staff are not allowed in the housing units. A sign is placed on the door of the unit directing female staff not to enter during this time.

Provision (e):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Brig staff will not search or physically examine a transgender, intersex, or gender non-conforming prisoners for the sole purpose of determining the prisoner's genital status. Upon initial receipt and prior to search, if the prisoners genital status is unknown, it may be determined during conversations with the prisoner, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical officer."

Review of the Brig SOP confirmed staff will not search transgender, intersex, or gender on-conforming prisoners for the sole purpose of determining genital status. Interviews with five (5) security staff confirmed these types of searches were not allowed. During the onsite review there were no transgender or intersex prisoners for the Auditor to interview.

Provision (f):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Per reference (m), the training section will ensure annual training of all security staff in conducting crossgender frisk searches, and searches of transgender and intersex prisoners, in a professional and respectful manner and in the least intrusive manner possible consistent with security needs."

The auditor reviewed signed training rosters and Policy Letter 2-17 that contain material instructing staff on how to conduct cross gender pat down searches and searches of transgender and intersex inmates in a professional and respectful manner and in the least intrusive manner consistent with security needs. Interviews with random security staff confirm that training is received during initial corrections training and refresher training is received yearly that includes cross gender pat down searches, transgender, and intersex prisoner searches.

Conclusion:

Based on examination and analysis of the evidence, the auditor has determined the facility has exceeded the requirements of this standard. No corrective action is required.

<p>115.16</p>	<p>Inmates with disabilities and inmates who are limited English proficient</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Memorandum for Record on Prisoners with Disabilities and Prisoners who are Limited English Proficient 4. Interviews Conducted: Brig Commanding Officer, PREA Compliance Manager, Intake Staff, Random Security Staff 5. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility stated they take appropriate steps to ensure 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.</p> <p>Provision (a)(b):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The CO or designee shall consult with a qualified Americans with Disabilities Act (ADA) Coordinator and take appropriate steps to ensure that prisoners with disabilities (e.g. prisoners who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities) have an equal opportunity to participate in or benefit from all aspects of the Brig's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps include, when necessary, to ensure effective communication with prisoners who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Written materials are</p>
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provided when necessary in formats or through methods that ensure effective communication with prisoners with disabilities. including prisoners who have intellectual disabilities, limited reading skills, or who are blind or have low vision. The Brig is not required to take actions that would result in a fundamental alteration in the nature of a service. program. or activity. or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title 11 of the ADA 28 CFR 35.164. Access to such services and materials are provided in the Prisoner Rules and Regulations, in printed materials or posted in the housing units. Reasonable steps shall be taken to ensure meaningful access to all aspects of the facility's efforts to prevent, detect. and respond to sexual abuse and sexual harassment to prisoners who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Linguistic services may be accessed via Military One Source via <http://militaryonesource.mil> or call 1-(800)342-9647. At the installation level, the MCIEAST G2 Department would be the best resource for a requested interpreter.”

There are stringent guidelines military applicants must meet for entry into military duty, presumptive disqualifications include limited English skills, deafness, blind or psychiatric disabilities. Should any of these disabilities incur or manifest while on active duty the Brig has established methods to ensure meaningful access to the agency's efforts to prevent, detect, and respond to sexual abuse and harassment will be provided. During the onsite review, the Auditor observed PREA posters displayed in the intake area, housing units and multi-purpose room. Interview with Intake staff confirmed prisoners initially are required to read and sign an acknowledgement of the Brig's zero-tolerance policy as part of the confinement intake process. Should a language other than English need to be utilized, staff would call the interpreter line from Military One Source, or request assistance from MCIEAST G-2 for blind, low vision, or hearing disabled prisoners. Utilization of these services would be documented on the intake form. Interviews with five (5) security officers confirmed they were aware of these services to utilize if needed. Interviews with eleven (11) prisoners confirmed none of them had a need to utilize these services.

Provision (c):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Prisoner interpreters, prisoner readers, or other types of prisoner assistants are prohibited except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise prisoner's safety, the performance of first-responder duties, or the investigation of the prisoner's allegations.” Interviews with five (5) security staff confirmed they would not utilize another prisoner to interpret for another except in an extreme emergency, however, they further stated they have never had to utilize another prisoner for interpretation services in exigent circumstances. There were no prisoners to interview housed at the Brig who spoke another language other than English.

	<p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Annual NCIC Record Check 4. Staff NCIC Checks 2023 and 2024 5. Interviews Conducted: PREA Compliance Manager (Submits NCIC Requests) <p>In the Pre-Audit Questionnaire (PAQ), the facility stated agency policy prohibits the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse, been convicted of engaging or attempting to engage in sexual activity or has been civilly or administratively adjudicated to have engaged in sexual activity described by this standard. The facility further reported there have been ninety (90) employee and eighteen (18) contractor criminal background record checks conducted in the last twelve (12) months on those who may have contact with inmates.</p> <p>Provisions (a)(b)(c)(d)(e)(f)(g)(h):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Brig will not employ, or promote anyone who may have contact with prisoners, and will not enlist the services of any contractor who</p>

may have contact with prisoners who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997; Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section. Civilian personnel convicted of a felony are ineligible for employment in a confinement facility as per references (e) and (f).

The Brig will consider any incidents of sexual harassment in determining whether to hire, retain, promote anyone, or to enlist the services of any contractor, who may have contact with prisoners. Before hiring new employees, who may have contact with prisoners, the BO will: Conduct a National Crime Information Center (NCIC) criminal background records check as per reference (b) and b); and Consistent with Federal State, and local laws, make 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. The BO, or designee will process criminal background records check (NCIC) as per reference (b), before the facility enlists the services of any contractor or volunteer who may have contact with prisoners. The BO will request criminal background NCIC background checks at least annually on current staff, contractors and volunteers who may have contact with prisoners, or have in place a system for otherwise capturing such information for current staff. The Company Office will collect and save needed information from personnel, for the annual NCIC background checks. DC I&L Corrections Branch will conduct an NCIC check on all submitted names from the BO or PREA Compliance Manager. These NCIC checks and PII personal information, are maintained with the PREA Compliance Manager and the Brig Company office. The BO or designee will ask direct questions of all applicants and staff who may contact with prisoners regarding previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. New employees will be required to complete enclosure (9), for screening purposes. The CO will also impose upon staff a continuing affirmative duty to disclose any such misconduct. The BO will review proposed staff assignments in advance for standards compliance. Military members deemed unqualified per provisions of paragraph (a) above will not be recommended for promotion/advancement. Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Appropriate administrative or disciplinary actions will be referred to the applicable civilian or military activity for action. Unless prohibited by law, the Brig will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.”

The auditor reviewed completed NCIC background checks for staff and contractors for 2023 and 2024. Questions required of provision (a) are asked upon assignment to the Brig and at PREA initial and refresher training. At initial training and refresher training

	<p>staff sign a continuing affirmative duty to disclose such misconduct. Applicants for military duty or for contractor positions within the government sign a statement on applications giving notice that material omissions or false information will be grounds for termination. Interview with the PREA Compliance Manager confirmed background checks are conducted of staff and contractors on an annual basis. The interview additionally confirmed all lawful information would be provided for potential employers requesting information from the Brig about applicants who previously were employed by the Brig.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.18	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Interviews Conducted: Brig Commanding Officer, PREA Compliance Manager 4. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states the Brig has not designed or acquired any new facility or planned any substantial expansion or modification of existing facilities or installed or updated a video monitoring system, electronic surveillance system or other monitoring technology since the last PREA audit.</p> <p>Provisions (a)(b):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "When designing or acquiring any new features or planning any substantial expansion or modification of existing facilities. CMC DC J&L (Corrections) will consider the effect of the design, acquisition, expansion, or modification upon the Brig's ability to protect prisoners from sexual abuse. When installing or updating a video monitoring system, electronic surveillance system. or</p>

	<p>other monitoring technology, the BO will consider how such technology may enhance the Brig's ability to protect prisoners from sexual abuse. All Brig and technology upgrades must be coordinated with the BO/CO. Physical Security. Information Technology and Financial Management staff.”</p> <p>Interviews with the Brig Commanding Officer and PREA Compliance Manager confirmed the Brig has not designed or acquired a new facility, planned any substantial expansions or modifications of the Brig or installed or updated the video monitoring system, electronic surveillance system or monitoring technology since the last PREA audit.</p> <p>Conclusion:</p> <p>Based upon review and analysis of all available evidence, the auditor has determined that this standard is not applicable to the Brig.</p> <p>Recommendation:</p> <p>The camera system currently utilized by the Brig is sufficient for supervision and monitoring prisoners; however, the Brig could benefit from a system upgrade in order to maximize efforts in providing prisoner supervision.</p>
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115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Memorandum of Understanding Camp Lejeune Base PREA Support 4. SAPR Poster 5. Interviews Conducted: PREA Compliance Manger, Random Security Staff, SAFE/SANE Staff, Random Security Staff 6. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states the NCIS Agency is responsible for conducting either administrative or criminal sexual abuse investigations. The Agency investigators follow a uniform evidence protocol and the protocol is developmentally appropriate for youth as applicable. The facility additionally reported SAFE/SANE examinations would be conducted at the Camp Lejeune Naval hospital and there has not been any SAFE/SANE examinations in the last twelve (12) months.

Provision (a)(b):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Investigations regarding alleged sexual abuse reported cases, will be referred to the Naval Criminal Investigative Service (NCIS) in accordance with reference (f). NCIS will follow its protocols for collection of evidence. Brig staff will secure the scene and prisoners until investigators arrive. All sexual misconduct and harassment alleged reported cases are referred to trained Brig military investigators or sent out to the CID office for their own investigation. These are administrative investigations due to the nature of the reported offenses but still taken very serious when reported. The Brig staff will not conduct any criminal investigation involving rape or forms of sexual abuse, under PREA policies and procedures. All assigned investigators will follow NCIS, and Navy Bureau of Medicine and Surgery (BUMED) protocols for evidence collection and medical examinations for administrative proceedings and criminal prosecutions in accordance with reference (i). For juveniles, NCIS follows appropriate uniform evidence protocols that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions."

NCIS would perform investigations for allegations of sexual abuse. Investigation protocols maximizes the potential for obtaining usable physical evidence for administrative and criminal prosecutions. This protocol is developmentally appropriate for youth and applied to not only Brig investigations, but any investigations conducted by NCIS in support of Camp Lejeune and Marine/Navy operations at the base. Interviews with five (5) random security officers confirmed NCIS would complete investigations of sexual abuse that occurred at the Brig.

Provision (c)(d)(e)(h):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Brig Medical Officer (MO) will offer all victims of sexual abuse access to forensic medical examinations at the Camp Lejeune Naval Hospital, without financial cost, where evidentiary or medically appropriate. The Brig MO will refer all prisoners of sexual abuse to the Naval Hospital where qualified practitioners are available in accordance with reference (g). Such examinations shall be performed by Sexual Assault Forensic Examiners (Safes) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners and shall be documented by the MO. The health care professionals at those facilities will

document patient history, injuries, and make a determination if referral to a mental health facility other than the Brig is required. The MO will ensure such documentation is maintained in the prisoner medical record. Counseling for sexually transmitted infection (STI) treatment and follow-up will be conducted as appropriate. Upon learning of a sexual assault, the first staff member to receive the report will inform the DBS or designee who will then attempt to make available to the victim, a Sexual Assault and Response Coordinator (SARC) or Uniform Victim Advocate (UVA) in accordance with references (f) and (h). All efforts to secure services from a SARC or UVA will be documented (e.g., email, DBS Report, etc.). The SARC will subsequently offer support to, and accompany the victim through the forensic medical exam process and investigatory interviews. Victims may also request emotional support services, crisis intervention, information and referrals anonymously via the DOD SAFE Helpline (Operated by the Rape, Abuse & Incest National Network (RAINN)) at (877)995-5427, or those listed. The DoD Safe Helpline 24 hotline will be made available to prisoners and will not be recorded or monitored. The PREA Compliance Manager in cooperation with the BO may contact a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services. The PREA Compliance Manager will maintain copies of agreements or documentation showing attempts to enter into such agreements. If a rape crisis center is not available, the UVA or SARC will provide emotional support, crisis intervention, information and referrals and document all efforts to support the victim as per reference (e.g., email, log, letter, etc.). As requested by the victim, and if available, the victim advocate, qualified community-based organization staff member, or a combination thereof, will accompany and support the victim through the forensic medical examination, and referrals. For the purposes of this standard, the installation SARC serves as a qualified agency staff member. These individuals are screened through the SAPR Program and have received training concerning sexual assault and forensic examination issues in general before undertaking victim advocate duties as per reference.”

Interview with SAFE/SANE staff confirmed victims of sexual abuse would be transported to the Camp Lejeune Naval Hospital for an examination, at no charge. A victim advocate would be provided for support during the exam and during investigatory interviews. In addition, the victim advocate would provide emotional support, crisis intervention, information and referrals as needed. During the onsite review, there were no prisoners who reported sexual abuse or sexual assault for interview. The Brig only utilizes and has available trained qualified staff for support concerning sexual assault and forensic examination issues.

Provision (f)(g):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “To the extent the Brig is not responsible for investigating allegations of sexual abuse, CMC DC I&L Corrections will request that the investigative agency follow the requirements of paragraphs (a) through (d) of this section. The Marine Corps Corrections System does not use outside State or DOJ

	<p>components to investigate allegations of sexual abuse and sexual harassment.” The Auditor has determined provisions (f) and (g) are not applicable.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act 3. (PREA) Procedures 4. Memorandum of Understanding Camp Lejeune Base PREA Support 5. Interviews Conducted: Brig Commanding Officer, Investigation Staff 6. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states the agency requires a criminal and/or administrative investigation to be completed for all allegations of sexual abuse and sexual harassment. The facility further reported there have been two (2) allegations of sexual abuse and harassment received in the past twelve (12) months in which one (1) was referred for a criminal investigation and one (1) was referred for an administrative investigation.</p> <p>Provision (a)(b):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “All allegations of sexual abuse or rape, will be immediately reported to the Naval Criminal Investigative Service (NCIS) for a criminal investigation. The Brig’s policy is to ensure that reported allegations of sexual abuse</p>

or rape, are referred to NCIS in accordance with reference (f) for investigation or an appropriate Military Criminal Investigation Organization (MCIO). All sexual harassment and misconduct reported cases, should be investigated by trained military assigned investigators, for administrative investigations and actions. The CID office, could be sent these cases as well, under a case by case basis, if needed. All referrals will be documented by the command investigators. The PREA Compliance Manager will assign a sequential case control number in the following format for each case, in a calendar year: (Example: 0001-YYYYMMDD). The PREA Compliance Manager will ensure the policy is published on the facility's website or make the policy available through other means."

The auditor reviewed eleven (11) investigation files of allegations that occurred since the last audit at the Brig. Review of files confirm an administrative investigation was completed for all allegations. The auditor reviewed MCIEAST Regional Brig PREA website which additionally confirmed all investigations would be completed for all allegations of sexual assault, sexual abuse, and sexual harassment. Interview with the Brig Commander and PREA Compliance Manager confirmed allegations are sent NCIS for investigation, if the case is not criminal it would then be sent back to the facility for an administrative investigation.

Provision (c)(d)(e):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Marine Corps Corrections System does not use outside State or DOJ components for investigating allegations of sexual abuse and sexual harassment." The Auditor has determined these provisions are not applicable to the Brig.

Conclusion:

Based on examination and analysis of the evidence, the auditor has determined the Brig is compliant with this standard. No corrective action is required.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act

(PREA) Procedures

3. PREA PowerPoint Presentation for Staff
4. PREA Refresher Training Signed Acknowledgement & Statement of Understanding
5. Interviews Conducted: PREA Compliance Manager, Random Security Staff
6. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states that all staff who have contact with inmates have been trained on the elements of this standard. The training is documented by a signature on sign in sheets and must be completed on annually.

Provision (a)(b)(c)(d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Training Chief is responsible for the training of all staff members during pre-service and annually thereafter. Training delivery may be delegated. Any certified PREA trainer will be qualified to conduct such training by completing, at a minimum, the following six National Institute of Corrections (NIC) PREA courses: a. Behavioral Health Care for Sexual Assault Victims in a Confinement Setting, b. PREA Coordinators' Roles and Responsibilities, c. PREA Audit Process and Instrument Overview, d. Investigating Sexual Abuse in a Confinement Setting, e. Medical Health Care for Sexual Assault Victims in a Confinement Setting, and f. Your Role: Responding to Sexual Abuse. Staff training will include individual completion of the NIC course PREA: Your Role Responding to Sexual Abuse at <http://nic.learn.com> and the supplemental facility-specific training conducted annually. Staff trained by NCTI-based instructors prior to signature of this policy will adhere to this policy during subsequent refresher training. Facility supplemental training will cover at a minimum the following topics: The facility's zero-tolerance policy for sexual abuse and sexual harassment; How to fulfill staff responsibilities under facility sexual abuse, sexual harassment or sexual misconduct, sexual assault, prevention, detection, reporting, and response policies and procedures; Prisoners' right to be free from sexual abuse and sexual harassment; The right of prisoners and staff to be free from retaliation for reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and sexual harassment in confinement; The common reactions of sexual abuse and sexual harassment victims; How to detect and respond to signs of threatened and actual sexual abuse; How to avoid inappropriate relationships with prisoners; How to communicate effectively and professionally with prisoners, including, lesbian, gay, bisexual, intersex, and gender nonconforming prisoners; How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; Definitions of sexual misconduct; and Prevention and warning signs. Staff awaiting orientation who are expected to have interaction with prisoners will receive the training outlined for volunteers, contractors and interns and sign a document as such. The Brig's

training curriculum is tailored to address male prisoners and provides information on female prisoner processing. All staff receive training outlined in paragraph (2) above during pre-service training. The facility provides each employee with refresher training every year to ensure that all employees know the Brig's current sexual abuse and sexual harassment policies and procedures. The Training Chief documents staff members understanding of the training by utilizing the PREA Staff Training Acknowledgement form. An electronic copy of the NIC training certification and Enclosure (I) are forwarded to the PREA Compliance Manager for file, archive and audit."

The auditor reviewed the staff PREA training PowerPoint slides and confirmed it includes all elements of provision (a). The auditor additionally reviewed signed Staff PREA Refresher Training Acknowledgement & Statement of Understandings for staff assigned at the Brig, which included this statement, "I have read and fully understand the written instructions and policies above." Interviews with random security staff confirmed that all had received PREA training upon assignment to the Brig and have received PREA training annually thereafter.

Conclusion:

Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. PREA PowerPoint Training Slides 4. Volunteer/Contractor/Intern PREA Training and Acknowledgement & Statement of Understanding Forms for 2022, 2023 and 2024 5. Interviews Conducted: Volunteer and Contractor who have Contact with Prisoners.

6. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states 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. The facility further reported that thirty-six (36) contractors and volunteers have been trained in the last year.

Provision (a)(b)(c):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "All volunteers, contractors, and interns who have contact with prisoners will be trained on their responsibilities under the Brig's sexual abuse and sexual harassment prevention, detection, and response policies. This training will be provided by a qualified instructor and prior to any unescorted contact with prisoners. The level and type of training provided to volunteers, contractors, and interns will be based on the services they provide and level or contact they have with prisoners, but all volunteers and contractors who have contact with prisoners shall be notified of the facility's zero-tolerance policy regarding sexual abuse, sexual harassment or sexual misconduct and informed how to report such incidents. The Training Chief maintains documentation confirming that volunteers, contractors, and interns understand the training they have received and will maintain such files for audits. When volunteers, contractors and interns attend employee training, it will be documented. An electronic or hard copy of the Volunteer/Contractor/Intern training acknowledgement form will be forwarded to the PREA Compliance Manager for file archive and audit."

Training is documented by a signature on the PREA Training and Acknowledgement & Statement of Understanding Forms. Volunteers and Contractors receive the training at the same level of staff assigned at the Brig. Interview with the PREA Compliance Manager confirmed Volunteers and Contractors receive PREA training at initial assignment and annually thereafter. The Auditor interviews a Contractor and a Volunteer during the onsite review and confirmed through interviews both had received initial PREA training and had received it annually thereafter.

Conclusion:

Based on examination and analysis of the evidence, the auditor has determined the facility exceeds this standard based on the comprehensive initial and annual training provided to Volunteers and Contractors. No corrective action is required.

115.33	Inmate education
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

The Auditor reviewed, analyzed and retained the following evidence related to this standard:

1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ)
2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures
3. Prisoner Handbook
4. Prisoner PowerPoint Training Slides
5. Signed Intake Acknowledgements
6. Interviews Conducted: Intake Staff, Random Prisoners
7. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states one hundred and twenty-two (122) prisoners have received inmate education at intake explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. The facility further reported sixty-seven (67) prisoners had a length of stay for more than thirty (30) days.

Provision (a)(b)(c)(d)(e)(f):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "During the intake process, prisoners will receive information orally and in writing addressing the Brig's zero-tolerance policy regarding sexual abuse, sexual harassment and sexual misconduct and how to report incidents or suspicions or sexual abuse, sexual harassment or sexual misconduct. The DBS will also address prevention, intervention, self-protection, treatment and counseling information per the PREA Intake Information Sheet. Within 14 days of intake the Programs Section and PREA Compliance Manager is responsible to provide comprehensive education to prisoners either in person, verbally, or through video training, regarding their rights to be free from sexual abuse, sexual harassment, sexual misconduct and to be free from retaliation for reporting such incidents, and regarding facility policies and procedures for responding to such incidents. This training is provided by a qualified instructor, usually the assigned PREA Compliance Manager or designee. Current prisoners who have not received such education shall be educated within one year of the effective date or the CMC DC I& L (Corrections) Policy Letter 1-14 and shall receive education upon transfer from another facility to the extent that the policies and procedures differ from those of the previous facility. The Brig provides prisoner education in formats accessible to all prisoners, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled

as well as to prisoners who have limited reading skills. Upon completion or training, the PREA Compliance Manager ensures prisoners sign the PREA Prisoner Training Acknowledgement form and place the form in the prisoner’s record. A copy of the prisoner training acknowledgement form shall be filed with the PREA Compliance Manager for file and future audits. In addition to providing such education, the Programs section and PREA Manager will ensure that key PREA information is continuously and readily available or visible to prisoners in housing units and other communal areas such as the library through posters, prisoner handbooks, or other written formats.”

Upon entry into the confinement facility prisoners are required to stand in front of a PREA informational poster and acknowledge understanding of the zero-tolerance and reporting instructions for the Brig. Once the prisoner has completed intake they are placed into the Restrictive Housing Unit for indoctrination. Prisoners are required to read and comprehend the Prisoner Handbook material, which includes PREA education. In order to “graduate” into the General Housing Population the prisoner must pass a written test. During this period the prisoner is provided with PREA PowerPoint slides and is able to review and study the material for as long as the prisoner would like to review and comprehend the material. The auditor observed PREA posters placed in the housing units, intake area, and multi-purpose room.

Review of prisoner files confirmed completion of the indoctrination test, zero-tolerance and reporting acknowledgements. Interview with intake staff confirmed PREA education is provided upon intake and signed acknowledgement. Interviews with eleven (11) prisoners confirmed they were required to observe and acknowledge the zero-tolerance and reporting instructions poster upon intake, they were required to take a test which included PREA information, and viewed the PREA PowerPoint training slides.

Conclusion:

Based on the review and analysis of all the available evidence, the auditor has determined the agency has exceeded this standard. No corrective action is needed.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act

(PREA) Procedures

3. NCIS Investigators Certificates of Completion for PREA: Investigating Sexual Abuse in a Confinement Setting by the National Institution of Corrections
4. Interviews Conducted: PREA Compliance Manager, Investigator
5. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states that the agency has a written policy requiring investigators are trained in conducting sexual abuse investigations in a confinement setting. The Brig reported there are two (2) investigators assigned to administrative investigations and NCIS would complete the criminal investigations

Provision (a)(b)(c):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "In addition to the general training provided to all staff pursuant to 115.31 investigators shall receive training in conducting sexual abuse investigations in a confinement setting. The National Institute of Corrections (NIC) "Investigating Sexual Abuse in a Confinement Setting" course, located at <http://nic.learn.com> meets the minimum requirement for this standard. This may be coordinated through the PREA Compliance Manager. Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warning, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Completion certificates will be forwarded electronically to the Training Chief and PREA Compliance Manager for file, archive, and audit."

The Auditor is familiar with the National Institution of Corrections Investigator curriculum and finds it compliant. Interviews with an Investigator confirmed they conduct administrative or criminal investigations at the Brig. Interview and review of training documentation with the Investigator that conducts administrative investigations at the Brig confirmed he had received general PREA training required under 115.31 and the specialized training required of this standard. Interviews further confirmed they were knowledgeable and could articulate interview techniques, the difference between Miranda and Garrity, and direct evidence versus circumstantial evidence.

Provision (d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Marine Corps Corrections System does not use outside State or DOI components for investigating allegations of sexual abuse and sexual harassment." The Auditor finds this provision is not applicable to the Brig.

	<p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.35	Specialized training: Medical and mental health care
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. PREA: Behavioral Health Care for Sexual Assault Victims in a Confinement Setting Certificates from the National Institution of Corrections 4. PREA: Medical Health Care of Sexual Assault Victims in a Confinement Setting Certificates from the National Institution of Corrections 5. Interviews Conducted: Medical Staff, Mental Health Staff 6. Auditor Observations <p>Provisions (a)(b)(c)(d):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "All medical and mental health care practitioners who work regularly in the Brig, will receive the training mandated for staff under 115.31 and complete the "Medical Health Care for Sexual Assault Victims in a Confinement Setting" and "Behavior Health Care for Sexual Assault Victims" located at http://nic.learn.com, which includes at a minimum: How to detect and assess signs of sexual abuse and sexual harassment; How to preserve physical evidence of sexual abuse; How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and How and to whom to report allegations or suspicions or sexual abuse and sexual harassment. Brig medical staff will not conduct sexual assault forensic examinations. Brig medical and mental health personnel will ensure documentation of completed training in reference to this standard is scanned and</p>

	<p>forwarded to the Training Chief and PREA Compliance Manager for file. All other part-time medical and mental health care practitioners will complete the Volunteer, Contractor, Intern training and NIC courses identified above.”</p> <p>The Auditor is familiar with the National Institution of Corrections curriculum for PREA Medical and Mental Health providers and finds the training material compliant. Interviews with the facility medical and mental health staff indicated the facility does not conduct SANE exams. The medical and mental health staff reported they are required to attend general PREA training every year. Review of staff files confirmed all had received general PREA training required in §115.31 and have received the specialized training.</p> <p>Provision (b):</p> <p>Medical staff at the Brig do not conduct forensic examinations. These examinations are conducted at the Camp Lejeune Naval Hospital. The Auditor finds this standard not applicable.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.41	Screening for risk of victimization and abusiveness
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Screening for Risk of Victimization and Abusiveness Form 4. Interviews Conducted: Intake Staff, Classifications Staff, Random Prisoners 5. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states the agency does have a policy that requires all inmates be assessed during intake and upon transfer to another</p>

facility for risk of sexual abuse by other inmates or sexual abusiveness toward other inmates. The facility further reported seventy-eight (78) prisoners were assessed within 72 hours of arrival at the Brig and sixty-seven (67) were reassessed within thirty (30) days of arrival.

Provisions (a)(b)(c)(d)(e)(h)(i):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "All prisoners except for (Female Confinements) will be assessed by the DBS and assigned Medical Staff within 24 hours of arrival at the Brig utilizing the objective screening instrument (Screening for Risk of Victimization and Abusiveness Form). Females that are processed at this facility, will complete this form, when they are sent to the local approved County Jail for confinement with PREA policies/procedures. The intake screening, at a minimum, considers the following criteria to assess prisoners for risk of sexual victimization: Whether the prisoner has a mental, physical, or developmental disability; The age of the prisoner; The physical build of the prisoner; Whether the prisoner has previously been incarcerated; Whether the prisoner's criminal history is exclusively nonviolent; Whether the prisoner has prior convictions for sex offenses against an adult or child; Whether the prisoner is or is perceived to be lesbian, gay, bisexual, transgender, intersex, or gender nonconforming; Whether the prisoner has previously experienced sexual victimization; The prisoner's own perception of vulnerability; and Whether the prisoner is detained solely for civil immigration purposes. The intake screening considers the following criteria to assess prisoners for risk of being sexually abusive: Prior acts or sexual abuse; Prior convictions for violent offenses; and History of prior institutional violence or sexual abuse. as known to the facility. An assigned Programs counselor, will maintain important prisoner PREA information and it will be placed on an Excel spreadsheet known as a PREA Tracker to keep confidential stats on the important questions answered by confined prisoners. The PREA Tracker should be on the share-drive, and have a pass code for those staff that need direct access to the information to view or update the spreadsheet. These stats are used to help the Brig staff with a need to know, concerning past personal sexual history, personal problems, mental health issues, and for other details on the confined prisoner. Medical personnel will provide any new information to the Programs Chief and assigned counselor as needed for the C&A Board or weekly entries. Prisoners may not be disciplined for refusing to answer, or for not disclosing complete information in response to questions asked pursuant to paragraphs above. The Risk or Victimization and Abusiveness Form will be maintained in the Programs Counselor office area, in a file cabinet, with a PII Privacy statement attached with a "Need to know protection" security of information. After each calendar month is completed, the folder is then forwarded to the PREA Compliance Manager for management, safe keeping and yearly filing stats. Dissemination of the information contained on the form shall be on a need to know basis (e.g. CO, BO, Programs Chief, medical personnel, PREA Compliance Manager. etc.) to ensure that sensitive information is not exploited to the prisoner's detriment by staff or other prisoners. Medical and mental health personnel will track all prisoners identified as being at risk for victimization or abusiveness and which are transgender or intersex. These prisoners will be reassessed as directed by

above. Access to the identified prisoners will be on a need to know basis. (e.g. CO, BO, MO, medical personnel, PREA Compliance Manager, etc.).”

The Auditor reviewed an Alpha Report and Screening for Risk of Sexual Victimization and Abusiveness form. The Risk form does take into consideration all of elements required of provision (d) of the standard. Interview with Intake staff confirmed the initial assessment is completed as part of the intake process and completed within hours of intake. Review of prisoner files confirmed the assessment was completed upon intake. There were no prisoners who disclosed prior sexual victimization or identified as lesbian, gay, bisexual, transgender, intersex, or gender nonconforming. Interviews with eleven (11) prisoners confirmed they were given the risk assessment upon arrival at the Brig.

Provisions (f)(g):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Within 14 days of arrival at the Brig, a Programs Chief will reassess the prisoner's risk of victimization or abusiveness based upon any additional, relevant information received since the intake screening. A prisoner's risk level will be reassessed by medical and mental health personnel when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information, or conviction that bears on the prisoner’s risk of sexual victimization or abusiveness. In these occurrences the Programs Chief will be notified and the reassessment will be documented on a Standard Form (SF) 600 and in the counselor's weekly entry.”

Auditor review of prisoner files confined at the Brig for more than thirty (30) days confirmed the reassessment was conducted at fourteen (14) days after confinement. An interview with Classification staff confirmed this practice. Due to the prisoner having to have an indoctrination period of at least seven (7) days, the Auditor found this practice being completed too soon after the intake process. A recommendation was made and practice established and implemented onsite that the reassessment be conducted after fourteen (14) days.

Provisions (h)(i):

Interviews with Intake and Classification staff confirmed prisoners would not be disciplined for failing to disclose information asked on the risk assessment. The Auditor observed prisoner files in a locked cabinet. When files were taken out of the cabinet a privacy notice was placed on top of the file to identify sensitive information was enclosed.

Conclusion:

Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.

115.42	Use of screening information
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1430 412">The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol data-bbox="256 456 1458 860" style="list-style-type: none"> <li data-bbox="256 456 1123 490">1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) <li data-bbox="256 524 1406 602">2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures <li data-bbox="256 636 1166 669">3. Screening for Risk of Victimization and Abusiveness Form <li data-bbox="256 703 1458 781">4. Interviews Conducted: PREA Compliance Manager, Classification Staff, Intake Staff <li data-bbox="256 815 655 848">5. Auditor Observations <p data-bbox="256 972 1466 1128">In the Pre-Audit Questionnaire (PAQ), the facility states the agency does utilize the information from the risk screening to inform housing, bed, work, education and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p data-bbox="256 1173 496 1207">Provisions (a)(b):</p> <p data-bbox="256 1240 1474 1610">MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Programs Section and Classification & Assignment (C&A) Board uses information from the risk screening required by 115.41 to determine housing, cell assignment, work, education, and programing assignments, with the goal of keeping separate those prisoners at high risk of being sexually victimized from those at high risk or being sexually abusive. The BO will make recommendations to the CO on ensuring the safety or each prisoner by relying on the C&A board process, the Programs section and recommendations from medical and mental health personnel."</p> <p data-bbox="256 1644 1461 1890">The Auditor reviewed several Screenings for Risk of Victimization and Abusiveness forms. No forms reviewed indicated a prior or potential victim. Interview with staff responsible for the risk screening confirmed that at initial confinement a prisoner is housed in the restrictive housing unit for an indoctrination period. Although no intakes had established a risk of victimization, staff could articulate the identification and need to report information to a supervisor for additional housing review.</p> <p data-bbox="256 1924 608 1957">Provisions (c)(d)(e)(f)(g):</p> <p data-bbox="256 2002 1474 2080">MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "CMC DC J&L (Corrections) is responsible to designate</p>

the place of confinement for transgender or intersex prisoners. Upon assignment, the C&A Board considers, on a case-by-case basis housing and programming assignments to ensure the transgender or intersex prisoner's health and safety, and whether the placement would present management or security problems. Placement and programming assignments for each transgender or intersex prisoner will be re-assessed using the Risk of Victimization and Abusiveness Form at least twice each year to review any threats to safety experienced by the prisoner. The results of these assessments will be briefed at the C&A Board. A transgender or intersex prisoner's own views with respect to their own safety will be given serious consideration during the C&A process. Upon reception, transgender and intersex prisoners will be given the opportunity to elect if they want to shower separately from other prisoners. At any time they may request to elect to change their shower call preference (i.e. separate, joined). In order to maintain good order and discipline, the Brig CO or designee will make the final decision on how shower call will be conducted. If a prisoner's request for shower call with the other prisoners is denied, the reason will be documented. This standard will be adhered to according to the physical plant capabilities of the Brig. Lesbian, gay, bisexual, transgender, and intersex (LGBTI) prisoners are not housed in dedicated housing units solely on the basis of such identification or status unless otherwise directed by higher authority."

Interviews with the PREA Compliance Manager and Classification staff confirmed that placement and program assignments for transgender and intersex inmates are reassessed every six (6) months with consideration given to the inmate's own views of safety. The auditor observed showers within the housing units during the onsite audit. All showers are for one person only and provided privacy. During the onsite review there were no lesbian, gay, bisexual, transgender or intersex prisoners for the Auditor to interview.

Conclusion:

Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The Auditor reviewed, analyzed and retained the following evidence related to this standard:

1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ)
2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures
3. Interviews Conducted: Brig Commanding Officer, Staff Assigned to the Restrictive Housing Unit
4. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states the agency does have a policy that inmates at high risk for sexual victimization will not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available means of separation from likely abusers. The facility further reported that there have been no inmates at risk for sexual victimization placed in involuntary segregated housing in the past twelve (12) months.

Provisions (a)(b)(c)(d)(e):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Prisoners at high risk for sexual victimization will not be placed in involuntary restricted housing unless an assessment of all available alternatives has been made by the C&A Board, and a determination has been made that there is no available alternative means of separation from likely abusers. If an immediate assessment cannot be made, the prisoner may be held in restrictive housing for no more than 24 hours while the assessment is being conducted.

Prisoners placed in restrictive housing for this purpose will continue to have access to programs, privileges, education, library, social services, counseling services, religious services and guidance, recreational, and work opportunities to the greatest extent possible. If access to programs, privileges, education, or work opportunities are restricted, the Programs section will document such restrictions as listed below on the DD Form 509 and Special Handling Letter/Supplemental Form. The opportunities that have been limited; The duration of the limitation; and The reasons for such limitations. Prisoners will be assigned to involuntary restrictive housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. If an involuntary restrictive housing assignment is made pursuant to paragraph (2) of this section, the following will be documented in the prisoner record or electronic database information system (e.g., Naval Justice Information System (NJIS), Corrections Management Information System (CORMIS)) when available: The basis or concern for the prisoner's safety; and The reason why no alternative means of separation can be arranged. The C&A Board shall review the status of each prisoner assigned to Protective Custody every seven days to determine whether there is a continuing need for separation from the general population."

	<p>The Brig has a restrictive housing unit utilized for indoctrination, disciplinary, and administrative segregation. Should separation become necessary for a prisoner for protection, they would be assigned to this unit. Interview with the Brig Commanding Officer confirmed that the Brig does not place inmates at high risk for sexual victimization or alleged sexual abuse in the restrictive housing unit. Interview with Classification staff confirmed that should an involuntary segregation housing need to occur, the prisoner would be afforded a review every thirty (30) days. Interviews with five (5) random security officers additionally confirmed that should an inmate need to be removed from general population, they would be housed in the restrictive housing unit. Staff further confirmed access to programming, privileges and education would be continued. There were no inmates assigned to involuntary segregated for the auditor to interview.</p> <p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act 3. (PREA) Procedures 4. Prisoner Handbook 5. PREA Sexual Assault Reporting Poster 6. SAPR Poster 7. MCIEAST Regional PREA Poster 8. Staff PREA Training PowerPoint Slides 9. Interviews Conducted: PREA Compliance Manager, Random Security Staff, Random Prisoners, 10. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states the agency has provided multiple internal ways for inmates to privately report sexual abuse and sexual harassment and it has provided one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency.

Provisions (a)(b):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "PREA requires a criminal investigation be conducted for all incidents of sexual abuse, including anonymous and third-party reports. As such 'restricted reporting' as provided in references (f) and (h) does not provide for an investigation and is NOT an available reporting option in Marine Corps confinement facilities. Anonymous and third party reports will be investigated based on information provided in the anonymous report. All reports will be forwarded to NCIS for a criminal investigation or in some cases of sexual harassment or sexual misconduct; Military Police Investigators (MPI's) may investigate administrative style investigations or sent to CID for further reviews and thorough investigating with an external review. to show no conflict of interest in any alleged case. Prisoners have multiple internal ways to privately report sexual abuse, sexual harassment, retaliation by other prisoners or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. If a prisoner does not feel comfortable reporting such reports to their immediate supervisor, a report can be made to a staff member other than the prisoners' immediate supervisor to include, but not limited to their counselor, medical and mental health personnel, PREA Compliance Manager etc. This can be reported either verbally or in any written form. A report can be submitted anonymously through a third party or by submitting a DD 510 Prisoner Request Form to the Brig CO or B0's mailbox. The DoD Sate Helpline and the MCIEAST Inspector Generals (IG) Hotline are external entities which afford prisoners the ability to anonymously report sexual abuse or sexual harassment incidents. In accordance with PREA and DoD policy, anonymous and third party reports are forwarded to the Brig CO and investigated by NCIS. Prisoners also have access to those external entities listed on the PREA Resource Information Sheet and other available resources (internal and external) to report sexual abuse or sexual harassment. The Marine Corps Corrections System does not confine prisoners solely for civil immigration purposes."

The auditor observed PREA posters throughout the facility and posted by the telephones. Posters included telephone numbers for the Sexual Assault Prevention and Response lines and the MCI-East Inspector General (IG) hotline. Interviews with 5 (five) random security staff confirmed there are multiple ways for a prisoner to report abuse, which included reference to the posters in the facility. Interviews with eleven (11) random prisoners additionally confirmed they knew how to report or knew where to look for a number to report and referenced the posters and the Prisoner Handbook.

	<p>Provisions (c)(d):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Staff will accept reports made verbally, in writing, anonymously, or from third parties. Reports will be immediately documented and forwarded to the DBS or other appropriate supervisor. If a supervisor is the alleged perpetrator, the staff member will report to a different supervisor in their chain of command (e.g. Operations Chief, Brig Officer, etc.). Staff may privately report sexual abuse and sexual harassment of prisoners via the DoD Safe Helpline, SJ\RC, SAPR, Inspector General (IG), etc.”</p> <p>The Auditor reviewed the staff PREA training and confirmed it contains verbiage and procedures for staff to accept reports made verbally, in writing, anonymously, and from third parties. Training additionally instructs staff to document verbal reports. Interviews with five (5) random security staff confirmed they knew how to make a private report. Interviews further confirmed that all reports would be accepted: verbal, writing, anonymous and from third parties and all reports would be documented immediately</p> <p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Interviews Conducted: Grievance Designee 4. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states the agency does have a policy for addressing inmate grievances related to sexual abuse. The facility reported in the</p>

last year one (1) grievance was filed, the grievance was decided on within ninety (90) days.

Provision (a):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Marine Corps Corrections System has an administrative process to address prisoner grievances regarding sexual abuse."

Provisions (b)(c)(d)(e)(f):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "There is no time limit on when a prisoner may submit a grievance regarding an allegation of sexual abuse, sexual harassment, sexual misconduct or any other type of grievance. Prisoners are not required to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse, sexual harassment or sexual misconduct. Nothing in this section restricts the Brig's ability to defend against a prisoner lawsuit on the grounds that the applicable statute of limitations has expired. For the purposes of the Marine Corps Corrections System, the following will be adhered to regarding allegations of sexual abuse: Allegations Involving Sexual Misconduct: For allegations of sexual misconduct, facilities will process IAW procedures found in reference (f). A prisoner who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint; Such grievance is not referred to a staff member who is the subject of the complaint; The Brig issues a final 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 prisoners in preparing any administrative appeal; The Brig may claim an extension of time to respond of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. In these cases, the Brig CO will notify the prisoner in writing of any such extension and provide a date by which a decision will be made; Third parties, including other prisoners, staff members, family members, attorneys, and outside advocates are permitted to assist prisoners in filing requests for administrative remedies relating to allegations or sexual abuse, and are also permitted to file such requests on behalf of prisoners; If a third party files such a request on behalf of a prisoner, the Brig may require as a condition of processing the request, that the alleged victim agree to have the request filed on their behalf and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process; and If the prisoner declines to have the request processed on their behalf, the Brig will document the prisoner's decision. Allegations Not Involving Sexual Misconduct: The Brig may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse. Any portion(s) of the grievance not involving sexual misconduct will be handled in accordance with appropriate procedures found in references (f) and (h). Additionally, the following will be adhered to: The Brig CO or designee will issue a final decision on the merits or any portion of a grievance not involving sexual misconduct within 30 days of the initial filing of the grievance. The Brig CO will provide prisoners with a final decision as per paragraph 2a above. The Brig CO or designee will respond to all

	<p>prisoner grievances.”</p> <p>Interview with the facility Grievance Officer designee indicated the facility does have administrative procedures for dealing with offender grievance regarding sexual abuse. The procedures include a formal appeal process. Grievances alleging sexual abuse are considered emergency grievances and will be responded to immediately. There is no time limit imposed for filing a grievance and the offenders are not required to utilize the informal grievance procedures. Locked grievance boxes are located in all housing units. Grievances are picked up daily and any allegation involving sexual abuse is immediately forwarded to supervision for investigation. The Auditor reviewed eleven (11) investigation files and determined the allegation had not been received through the grievance process, therefore, no interview was conducted with an offender who reported sexual abuse or sexual assault through the grievance process.</p> <p>Provision (g):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “The facility may discipline a prisoner for filing a grievance related to alleged sexual misconduct only when it has been determined that the prisoner filed the grievance in bad faith.: Interview with the Grievance Officer designee confirmed there had not been any prisoners disciplined for filing a grievance alleging sexual abuse or in bad faith.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. PREA Informational Board Posters

4. MCI-EAST Regional Brig PREA Sexual Assault Reporting Poster
5. Memorandum for Record of PREA Support from Base Agencies
6. Interviews Conducted: Random Prisoner
7. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states SCCF does provide inmates with access to outside victim advocate services for emotional support related to sexual abuse. The facility additionally reported it does inform inmates, prior to giving them access of the extent to which communications will be monitored.

Provisions (a)(b)(c):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Prisoners will have access to outside victim advocates for emotional support services related to sexual abuse by calling the Sexual Assault Line. Mailing addresses and telephone numbers, including the toll-free DoD Safe Helpline. or other local, State, or national victim advocacy or rape crisis organizations will be available. Reasonable communication between prisoners and these organizations and agencies is permitted in accordance with privileged communications (e.g., legal phone booth, privilege correspondence, designated unrecorded phone numbers, etc.) The Brig will inform prisoners, 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. Prisoners are informed via the Intake Information Sheet, prisoner rules and regulations, posters or other printed materials displayed in the housing units, library, and multi-purpose room. The PREA Compliance Manager in coordination with the BO will maintain relationships or attempt to enter into Memorandums of Understanding or other agreements with community service providers that are able to provide prisoners with confidential emotional support services related to sexual abuse. The PREA Compliance Manager will maintain copies or agreements or document showing attempts to enter into such agreements."

The Auditor reviewed the SAPR poster which confirms it provides a PREA Crisis Hotline to all victims in confinement. The hotline is operated twenty-four (24) hours a day, seven (7) days a week, at no cost to the victims. The services provided include immediate advocacy, crisis counseling, emotional support, Victim's Rights information, victim compensation information and crisis intervention services to the offender victim.

During the on-site audit, the auditor observed the facility PREA posters in the housing units, intake area, and multipurpose room. The MCI-EAST Regional Brig poster provides three (3) reporting methods, to include reporting anonymously and to an outside agency, and provides phone numbers for contacting the confidential PREA Rape Crisis Advocacy hotline. In addition to the PREA posters, prisoners are notified

	<p>of the advocacy hotline through the Prisoner Handbook and PREA training conducted upon intake.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.54	Third-party reporting
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states it has established a method to receive third party reports of sexual abuse and sexual harassment.</p> <p>Provision (a):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Procedures for third-party reporting of sexual abuse and sexual harassment on behalf of prisoners will be posted in the housing units, visitation area, library and on the Brig website."</p> <p>The auditor observed posters in the housing units, on the intake walls, and the multi-purpose room walls that directed visitors to make a report by calling the SAPR number or IG hotline number.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is fully compliant with this standard that the agency has established a method to receive third-party reports of sexual abuse and sexual harassment.</p>

115.61	Staff and agency reporting duties
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1430 412">The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol data-bbox="256 456 1458 860" style="list-style-type: none"> <li data-bbox="256 456 1123 490">1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) <li data-bbox="256 524 1406 680">2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures <li data-bbox="256 714 1458 792">3. Interviews Conducted: Brig Commanding Officer, PREA Compliance Manager, Random Security <li data-bbox="256 826 655 860">4. Auditor Observations <p data-bbox="256 972 1437 1173">In the Pre-Audit Questionnaire (PAQ), the facility states it requires all staff to report any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility. The facility additionally reported that staff are prohibited from revealing any information related to a sexual abuse to anyone other than the extent necessary.</p> <p data-bbox="256 1218 485 1252">Provision (a)(b):</p> <p data-bbox="256 1285 1474 1688">MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Staff will immediately report to the DBS for immediate action: Any knowledge, suspicion, or information regarding an incident of sexual abuse, sexual harassment or sexual misconduct that occurs in any facility; Any retaliation against prisoners or staff who report such an incident; and Any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Staff will not reveal any information related to a sexual abuse report to anyone other than on a need to know basis in order to make treatment, investigation, and other security and management decisions (e.g.. designated supervisors or officials, medical, SAPR, CO, BO, etc.).”</p> <p data-bbox="256 1800 1458 1912">The Auditor reviewed the facility PREA PowerPoint curriculum and confirmed all staff are trained on their responsibilities for reporting any knowledge, suspicion or information they may receive regarding sexual abuse or sexual harassment.</p> <p data-bbox="256 1935 1474 2092">Interviews with five (5) random staff indicated they were knowledgeable on the requirements to immediately report to their shift commander would notify the NCIS if they receive any such information, or witness an incident of sexual abuse or sexual harassment. In addition, they could articulate that all information related to sexual</p>

abuse or sexual harassment shall not be revealed or discussed with any other than to the extent necessary, for treatment, investigations or other security and management decisions.

Provision (c):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Unless precluded by Federal, State or local law, Brig medical and mental health practitioners are required to report sexual abuse pursuant to paragraph (l) of this section and to inform prisoners of the practitioner's duty to report, and the limitation or confidentiality, at the initiation of services."

Interviews with medical and mental health staff confirmed they are mandatory reporters and are required to report an incident of sexual abuse or sexual harassment. Prisoners are informed of the limitations of confidentiality prior to the delivery of services. In addition, the Auditor observed, during the medical and mental health assessment completed during intake, the offender was informed of the limitations of confidentiality and provided samples of behaviors that must be reported.

Provision (d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "If the alleged victim is under the age of 18 or considered an vulnerable adult under a State or local vulnerable person's statute, the Brig will report the allegation under applicable mandatory reporting laws."

Interviews with the Brig Commanding Officer and PREA Compliance Manager confirmed the Brig does not house juvenile offenders; however, if an allegation was received that a vulnerable adult had been sexually abused or assaulted, the facility would make notification to the state or local services.

Provision (e):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Restricted Reporting as defined in the DoD and Marine Corps SAPR Program is not an available reporting option under PREA and the facility staff shall report all allegations of sexual abuse, sexual harassment and sexual misconduct, including third-party and anonymous reports to NCIS in accordance with references (f) and (h)."

Interviews with the Brig Commanding Officer and PREA Compliance Manager indicated all allegations are reported to the NCIS Investigators, immediately upon receipt of the allegation.

Conclusion:

Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.

115.62	Agency protection duties
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1430 412">The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol data-bbox="256 456 1406 815" style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act 3. (PREA) Procedures 4. Interviews Conducted: Brig Commanding Officer, Random Security Staff 5. Auditor Observations <p data-bbox="256 860 1477 1016">In the Pre-Audit Questionnaire (PAQ), the facility states that if an inmate is subject to substantial risk of imminent sexual abuse it will take immediate action to the protect the inmate. The facility additionally reported there has not been an inmate subject to substantial risk of imminent sexual abuse in the past year.</p> <p data-bbox="256 1061 443 1095">Provision (a):</p> <p data-bbox="256 1128 1477 1453">MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “When it is discovered a prisoner is subject to a substantial risk of imminent sexual abuse, the DBS will be notified and take immediate action (e.g., separate victim from alleged abuser, placement on protective custody, etc.) to protect the prisoner and notify the CO/BO. Such actions will be documented in the Brig Log and identified as a significant event (e.g., highlighted, color coded, searchable, etc.) annotated in the DBS report, documented on a DD Form 2713 Prisoner Observation Report, and filed in the prisoner record.”</p> <p data-bbox="256 1565 1477 1800">Interview with the Brig Commanding Officer confirmed that any staff member is able to remove an inmate from a situation should information be received of substantial risk of imminent sexual abuse. Interview with five (5) random security officers additionally confirmed an inmate would be removed from population and protection measures would be implemented to provide safety. Staff further reported supervision would be notified immediately.</p> <p data-bbox="256 1845 424 1879">Conclusion:</p> <p data-bbox="256 1912 1477 2069">Based on examination and analysis of the evidence, the auditor has determined the facility is fully compliant with this standard requiring that when the agency learns that an inmate is subject to substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.</p>

115.63 Reporting to other confinement facilities

Auditor Overall Determination: Meets Standard

Auditor Discussion

The Auditor reviewed, analyzed and retained the following evidence related to this standard:

1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ)
2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures
3. Interviews Conducted: Brig Commanding Officer
4. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states the agency does have a policy that requires upon receiving an allegation an inmate was sexually abused while confined at another facility the head of the facility that received the allegation will notify the head of the facility or appropriate office of the agency where the allegation occurred. The Brig reported there has not been any allegations received from another facility or allegations reported to the Brig in the last year.

Provision (a)(b)(c)(d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Upon receiving an allegation that a prisoner was sexually abused while confined at another facility, the CO or acting CO will notify the head or the facility/agency where the alleged abuse occurred (e.g., phone call, email correspondence, SITREP, etc.). Such notification will be provided as soon as possible, but no later than 72 hours after receiving the allegation. The PREA Compliance Manager will maintain documentation that the CO has provided such notification. Incident reports, brig logs, emails, etc. serve as sufficient documentation for the purposes of this standard. If the Brig receives such notification, allegations will be investigated in accordance with these standards."

Interview with the Brig Commanding Officer indicated he was knowledgeable regarding the procedures of Warden to Warden notifications. If an allegation is received from another facility, alleging an offender was sexually abused while housed at the Brig, he would document the notification and will assign the allegation to an NCIS investigator to complete an investigation. If an offender alleges he was sexually abused while housed at another facility, the Brig Commanding Officer would make a notification to the Warden at the facility where the allegation occurred. Notification would be made documented and completed within 72 hours.

	<p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. PREA Incident Response Procedures Form 4. Interviews Conducted: First Responders 5. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states there is policy for allegations of sexual abuse. The facility further reported there has been one (1) allegation of sexual abuse during the last year and the allegation required separation of the victim or abuser.</p> <p>Provision (a)(b):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "All Brig staff are designated as first responders. Upon learning of an allegation that a prisoner was sexually abused, the first security staff member to respond to the report will be required to: Separate the alleged victim and abuser; Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim and alleged abuser not take any actions that could destroy physical evidence. This includes as appropriate: washing the body, brushing teeth, changing clothes, urinating, defecating, drinking, or eating; and If the first staff responder is not a security staff member, the responder will be required to request that the alleged victim not take</p>

	<p>any actions that could destroy physical evidence, follow the steps listed above, and then notify any security staff member.”</p> <p>Review of the staff PREA training and sign-in rosters confirmed both custody and non-custody staff have been trained on first responder duties. Interviews with first responders confirmed they were knowledgeable about the requirements in provision (a). Interviews further confirmed they would separate the victim and the perpetrator, call for supervision, preserve the crime scene and would not allow the perpetrator to shower, wash, brush their teeth, use the bathroom or change their clothing.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. PREA Incident Response Procedures Form 4. Interviews Conducted: Brig Commanding Officer 5. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states that there is a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators and facility leadership.</p> <p>Provision (a):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “This SOP serves as the written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first</p>

	<p>responders, medical and mental health practitioners, investigators, and leadership. Refer to the PREA Incident Response Procedures form to facilitate a coordinated response.”</p> <p>The auditor reviewed the MCI-EAST Regional PREA Response Plan. The plan included instruction on actions to be taken in response to an incident of sexual abuse among staff first responders, medical and mental health staff, investigators and facility leadership. Interview with the Brig Commanding Officer confirmed the facility has a response plan in place and it would be utilized after an incident.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is fully compliant with this standard requiring the facility to develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Interviews Conducted: Brig Commanding Officer 4. Auditor Observations <p>The facility indicated in their response to the Pre-Audit Questionnaire that the agency or facility has not entered into or renewed a collective bargaining agreement since the facility's last PREA audit.</p>

	<p>Provision (a)(b):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “The Brig will not enter into or renew any collective bargaining agreement or other agreement that limits the facility’s ability to remove alleged staff sexual abusers from contact with any prisoners pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. Nothing will restrict the Brig from entering into or renewal of agreements that govern 115.66: The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of 115.72; and Whether a no-contact assignment that is imposed pending the outcome of an investigation will be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated.”</p> <p>The Auditor reviewed the MCI-EAST Regional Brig SOP and confirmed this directive does not interfere with the Brig’s ability to remove alleged staff abusers from contact with prisoners pending the outcome of the investigation. Interview with the Brig Commanding Officer confirmed there are no agreements to prevent the agency or facility from removing an alleged staff perpetrator from his or her post, or from the facility, until an investigation into the matter could be completed.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act PREA) Procedures 3. Memorandum for Record for Retaliation Monitoring 4. Interviews Conducted: Brig Commanding Officer, PREA Compliance Manager, Classification Staff

5. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states the agency does have a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff. The Brig further reported there have not been any incidents requiring monitoring during the last year.

Provision (a)(b)(c)(d)(e)(f):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "All prisoners and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations are protected from retaliation by other prisoners or staff. Retaliation monitoring is the responsibility of the PREA Compliance Manager. However, it is everyone's responsibility to remain vigilant for any signs of retaliation. The Brig will employ multiple protection measures, such as housing changes or transfers for prisoner victims or abusers, removal of alleged staff or prisoner abusers from contact with victims, and emotional support services for prisoners or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Monitoring for retaliation will continue for at least 90 days following a report of sexual abuse for prisoners or staff who reported the sexual abuse and of prisoners who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by prisoners or staff. The PREA Compliance Manager will notify the CO of such retaliation for prompt resolution. Items the PREA Compliance Manager should monitor are prisoner disciplinary reports, housing or program changes, negative performance reviews, or reassignments of staff. The PREA Compliance Manager will continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. The PREA Compliance Manager will monitor prisoners to include performing periodic status checks and a review of paperwork (e.g., housing assignments, work, education, and program assignments, excessive disciplinary reports, etc.) to ensure retaliation does not occur. If any other individual who cooperates with an investigation expresses a fear of retaliation, appropriate actions will be taken to protect that individual against retaliation. These measures will be documented and maintained by the PREA Compliance Manager. Monitoring will terminate if the investigating entity determines that the allegation is unfounded."

Interview with Classification staff confirmed retaliation monitoring would be conducted on a weekly basis for any prisoner who has made an allegation. The information would be documented on a form and filed within the prisoner file. The monitoring would be conducted for ninety (90) days and continued beyond that as needed. Interview with the Brig Commanding Officer further confirmed staff monitoring would be conducted by supervision and documented. Interviews additionally confirmed retaliation monitoring would be stopped if the investigation determined the allegation was unfounded.

Conclusion:

	Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.
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115.68	Post-allegation protective custody
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Interviews Conducted: Brig Commanding Officer, Staff who Supervisor Prisoners in Restrictive Housing 4. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states that the agency has a written policy that prohibits placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made. The facility reported there has not been any instances of an inmate held in segregated housing who alleged to have suffered sexual abuse who were held in involuntary segregated housing in the last year.</p> <p>Provision (a):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Any use of restrictive housing to protect a prisoner who is alleged to have suffered sexual abuse will be subject to the requirements of 115.43. All post-allegation protective measures will be recorded within the prisoner record and the Naval Justice Information System."</p> <p>During the onsite review the auditor did not observe any inmates held in segregated housing or within close watch areas as a result of any allegation of sexual abuse. Interview with the Brig Commanding Officer confirmed the Brig does not place inmates at risk for sexual victimization in segregated housing unless there are no alternate housing options available. Should an inmate be placed in segregated housing they would be housed there for the least amount of time until other housing</p>

	<p>options become available. The auditor reviewed eleven (11) investigation files, none of the victim’s housing assignment was changed after the allegation.</p> <p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>
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115.71	Criminal and administrative agency investigations
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	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Eleven (11) Investigation Files 4. Interviews Conducted: Brig Commanding Officer PREA Compliance Manager, Investigation Staff 5. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states the agency does have a policy related to administrative and criminal investigations, all investigators have received the specialized training required under this standard and all written reports will be retained.</p> <p>Provision (a)(b)(c)(d)(e)(f)(g)(h):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “The Brig will conduct administrative investigations relating to sexual misconduct and sexual harassment. Sexual abuse is a criminal allegation and will be sent out to the NCIS Agency for a thorough external investigation. As soon as reasonable suspicion of sexual abuse, sexual harassment, or sexual misconduct has occurred the allegations will be referred to the NCIS office for investigation or assigned an administrative investigation within the facility. Investigations will be conducted promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. Where sexual abuse is alleged, the NCIS office will use investigators who have received special training in</p>

sexual abuse investigations pursuant to 115.34. Investigators will gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data, will interview alleged victims, suspected perpetrators, and witnesses and will review prior complaints and reports of sexual abuse involving the suspected perpetrator according to their protocols. Should NCIS decline investigative jurisdiction, the CID office will be offered the case and complete the investigation. If CID determines that no criminal action occurred they may decline to investigate further and delegate the investigation responsibilities to an MPI of their choice or back to the Brig for further reviews of evidence. When the quality of evidence appears to support criminal prosecution, the investigative agency will conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. The investigator will assess the credibility of an alleged victim, suspect, or witness on an individual basis and not by the person's status as a prisoner or staff. Prisoners who allege sexual abuse will not be required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation. Administrative investigations will include an effort to determine whether staff actions or failures to act contributed to the abuse: and will be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. Criminal Investigations will be 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. Substantiated allegations of conduct that appear to be criminal will be referred for prosecution.

Review of MCIEAST Regional Brig SOP confirms the facility is directed to conduct investigations promptly, thoroughly and objectively for all allegations to include third-party reports. The Auditor reviewed the Investigators training certificates and confirmed specialized training was received. Review of eleven (11) investigation files confirmed direct and circumstantial evidence was collected (if available) along with electronic monitoring review and interviews of the alleged victim, witnesses, and perpetrator. Review of the investigation files additionally confirmed an effort to determine whether staff actions or failures to act contributed to the abuse or there is documentation that includes description of the physical and testimonial evidence, the reasoning behind credibility assessments and investigative facts and findings.

Interview with the Investigator confirmed specialized training had been received and all evidence would be collected to support findings for the allegation. There were no prisoners housed at the Brig to interview regarding a completed investigation.

Provision (i):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The PREA Compliance Manager will retain all written reports referenced in paragraphs (6) and (7) of this section for as long as the alleged abuser is confined or employed by the Brig, plus five years. All staff and section heads are required to provide the PREA Compliance Manager all documentation for file, archive, and audit. Release of any information contained in the case records will be processed per reference (k)."

Interview with PREA Compliance Manager indicated that all documents involved in a sexual abuse investigation are retained in a locked cabinet.

Provision (j):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The departure of the alleged abuser or victim from the employment or control of the Brig will not provide a basis for terminating an investigation." Interview with the Investigator confirmed if the alleged abuser or the victim was no longer employed or housed at the facility, the investigation would continue to completion.

Provision (k):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Marine Corps Corrections System does not use outside State or DOJ components for investigating allegations of sexual abuse and sexual harassment."

The Auditor finds this provision of the standard is not applicable for the Brig.

Provision (l):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "When outside agencies (e.g., NCIS, CID, IG, etc.) investigate sexual abuse, the BRIG will cooperate with outside investigators and will endeavor to remain informed about the progress of the investigation." Interviews with the Brig Commanding Officer and PREA Compliance Officer confirmed the Brig has a good working relationship with NCIS. Should NCIS need to conduct the investigation the Brig would remain informed through telephone calls or emails.

Conclusion:

Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Interviews Conducted: Investigator 4. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Provision (a):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “The Brig will not impose an evidentiary standard higher than a preponderance of evidence in determining whether allegations of sexual abuse, sexual harassment or sexual misconduct are substantiated.” Interview with the Investigator confirmed that the Brig does not impose any standard higher than a preponderance of the evidence to determine whether an allegation of sexual abuse or sexual harassment is substantiated.</p> <p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ)

2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act

(PREA) Procedures

3. Interviews Conducted: Brig Commanding Officer, Investigator

4. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states the agency does inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. The Brig additionally reported that two (2) allegations were made during the last year and both inmates were notified of the investigation results.

Provision (a)(b)(c)(d)(e)(f):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Following an investigation into a prisoner's allegation that they suffered sexual abuse in the Brig, the prisoner will be informed in writing as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This document will be drafted by the PREA Compliance Manager and forwarded to the CO for signature. If the Brig did not conduct the investigation, the PREA Compliance Manager will request the relevant information from the investigative agency (e.g., NCIS, CID, MPI, etc.) in order to inform the prisoner of the determination. Following a prisoner's allegation that a staff member has committed sexual abuse against a prisoner, the prisoner will subsequently be informed in writing, unless the facility has determined that the allegation is unfounded, whenever: The staff member is no longer posted within the prisoner's housing unit or any area where the alleged staff member and prisoner would be co-located. Subsequent staff posting or prisoner housing/work/program assignments will not result in co-location depending on the nature of the allegation; The staff member is no longer employed at the Brig; The staff member has been formally charged; or The staff member has been convicted on a charge related to sexual abuse within the Brig. Following a prisoner's allegation that they have been sexually abused by another prisoner, the alleged victim will be notified in writing whenever: The alleged abuser has been charged; or The alleged abuser has been convicted on a charge related to sexual abuse within the Brig. All such notifications or attempted notifications will be documented on the Notification of Investigative Status Form and a DD Form 2704 Victim/Witness Notification for all cases resulting in a sentence to confinement in accordance with reference. The Brig's obligation to report under this standard terminates if the prisoner is released from custody."

The Auditor reviewed eleven (11) investigation files and confirmed prisoner notification was completed in each case via form. Interview with the Investigator further confirmed prisoners are notified of the outcome of the investigation. The interview further confirmed that any investigation information would be requested from NCIS to inform the prisoner of the investigation results.

	<p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>
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115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Interviews Conducted: Brig Commanding Officer, PREA Compliance Manager 4. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states there have not been any staff members who have violated agency sexual abuse or sexual harassment policies or staff that have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies.</p> <p>Provision (a)(b)(c)(d):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "All staff will be subject to disciplinary action up to and including termination for violating sexual abuse or sexual harassment policies. The term "termination" for civilians means removal from further employment at the Brig after due process. For military members, termination means possible separation from military service after due process. For contractors and volunteers, termination means an abrupt cessation of any further relationship with the facility. In any case where an allegation of sexual abuse or sexual harassment is Substantiated, all staff are subject to disciplinary sanctions up to and including termination. Termination will be the presumptive disciplinary action for staff who have engaged in sexual abuse. Disciplinary actions for violations of policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) will be commensurate with the nature and circumstances of the acts committed; the staff members</p>

	<p>disciplinary history; and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of the Brig’s sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, will be reported to law enforcement agencies, unless the activity was clearly not criminal. and to any relevant licensing or endorsement bodies (e.g., education board and institutions, credentialing organization, or religious endorsing agencies, etc.). The Brig CO or designee will make these notifications.”</p> <p>Interview with the Brig Commanding Officer and PREA Compliance Manager confirmed that Brig staff would be subject to disciplinary action, to include termination, for violating the agency sexual abuse or sexual harassment policies. Should an incident occur, NCIS Investigators have the ability to proceed with a case criminally. There were no allegations involving any staff member, contractor or volunteer for the auditor to review.</p> <p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>
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115.77	Corrective action for contractors and volunteers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Interviews Conducted: Brig Commanding Officer 4. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states that Agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies (unless the activity was clearly not criminal) and to relevant licensing bodies and Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with inmates. During the last twelve (12) months the facility reported there have not been any contractors or volunteers have been reported to law enforcement agencies and relevant licensing</p>

	<p>bodies for engaging in sexual abuse of inmates.</p> <p>Provision (a)(b):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Any volunteer, contractor, or intern who engages in sexual abuse will be prohibited from contact with prisoners and will be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing or endorsement bodies (e.g., education board or institutions, credentialing organization, or religious endorsing agencies, etc.). For cases involving violations of sexual abuse or sexual harassment policies by a volunteer, contractor or intern, appropriate remedial measures will be taken including prohibition of further contact with prisoners and reporting the violation as appropriate to the volunteer's or intern's host organization. The PREA Compliance Manager will maintain copies of all remedial measures documentation for file, archive and audit purposes.”</p> <p>Interview with the Brig Commanding Officer confirmed that should a volunteer or contractor engage in sexual abuse with an inmate they would be removed from contact with prisoners and criminal behavior would be investigated. After investigation they would be reported to law enforcement or other relevant licensing bodies if required. If the contractor or volunteer violated Agency policy, but the action was not criminal the facility would consider all options available in considering whether to prohibit future contact with prisoners.</p> <p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>
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115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Interviews Conducted: Brig Commanding Officer, Medical/Mental Health Staff

4. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states that prisoners are subject to disciplinary sanctions following a formal disciplinary process if it is determined the prisoner engaged in prisoner-on-prisoner sexual abuse. The facility did not have any inmates disciplined for engaging in prisoner-on-prisoner sexual abuse or following a finding of criminal guilt for prisoner-on-prisoner sexual abuse in the past twelve (12) months.

Provision (a)(b):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Prisoners will be subject to disciplinary actions pursuant to formal disciplinary process following an administrative finding that the prisoner engaged in prisoner-on-prisoner sexual abuse or following a criminal finding of guilt for prisoner-on-prisoner sexual abuse. Actions will be commensurate with the nature and circumstances of the abuse committed, the prisoner's disciplinary history, and the actions imposed for comparable offenses by other prisoners with similar histories."

The auditor reviewed the Prisoner Handbook and confirmed that prisoners will be subject to disciplinary sanctions for rape, sexual assault, sexual misconduct, sexual harassment and unauthorized incidental contact. The sanctions are progressive in nature. Interview with the Brig Commanding Officer Warden additionally confirmed that inmates are subject to the disciplinary process after an administrative finding for engaging in prohibited activities.

Provision (c)(d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Should a prisoner have mental disabilities or a mental illness which may have contributed to his or her behavior as documented by medical or mental health practitioners, the disciplinary board will take these factors into consideration when determining what type of action, if any, should be imposed.

Counseling, therapy, or other interventions designed to address and correct underlying reasons or motivations for the abuse (e.g., sex offender education or treatment, violent offender education and treatment, individual counseling, etc.) will be offered, if available. The Brig will consider whether to require the offending prisoner to participate in therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse as a condition of access to programming or other benefits."

Review of the disciplinary form does not specifically identify if a prisoner's mental disability or illness contributed to the behavior, but interviews with the Brig Commanding Officer and a higher-level supervisor who has convened disciplinary boards confirmed a prisoner's mental health disability or illness is considered in determining sanctions. The Brig does not offer a sexual offender treatment program

	<p>for prisoners but does offer individual therapy and counseling. Interview with Medical/Mental Health confirmed counseling sessions are provided as needed.</p> <p>Provision (e):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Per reference (o), all sexual activity is prohibited in Marine Corps confinement facilities. A prisoner may only receive disciplinary action for the violation of the Cat IV offense “Sexual Misconduct” when the violation or contact was found to be non-consensual by the staff member.”</p> <p>Interview with a higher level supervisor who have convene disciplinary boards confirmed a prisoner would be sanctioned for such behavior and it is a punishable offense for the disciplinary process and potential criminal charges.</p> <p>Provision (f):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “For the purpose of disciplinary action, a report of sexual abuse, sexual harassment or sexual misconduct made in good faith, based upon a reasonable belief that the alleged conduct occurred, will not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.”</p> <p>Interview with the Investigator confirmed each and every case would be investigated. Prisoners would not be disciplined for making an allegation that was determined to be unfounded or unsubstantiated.</p> <p>Provision (g):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “All sexual activity between prisoners is prohibited and prisoners will face disciplinary action for such misconduct. Such activity does not constitute sexual abuse if determined that the activity is not coerced.” Per policy, the Brig prohibits sexual activity between prisoners.</p> <p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>
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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

The Auditor reviewed, analyzed and retained the following evidence related to this standard:

1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ)
2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures
3. Medical/Mental Health Logs
4. Memorandum for Record, Ongoing Medical and Mental Health Services for Sexual Abuse Victims
5. Limits on Confidentiality of Psychiatric Information Consent Form
6. Screening for Risk of Victimization and Abusiveness Form
7. Interviews Conducted: Classification Staff, Medical/Mental Health Staff
8. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states inmates who disclose any prior sexual victimization during a screening pursuant to §115.41 are offered a follow up meeting with a medical or mental health practitioner within fourteen (14) days; however, there were none in the last year. The facility additionally reported no prisoners who perpetrated sexual abuse were housed at the Brig.

Provision (a)(b)(d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "If the screening pursuant to 115.41 indicates that a prisoner has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, medical and mental health staff will ensure that the prisoner is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. If the screening pursuant to 115.41 indicates that a prisoner has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff will ensure that the prisoner is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. Any information related to sexual victimization or abusiveness that occurred in an institutional setting will be strictly limited to medical and mental health practitioners and other staff as necessary (e.g., CO, BO, DBS, Programs Chief, PREA Compliance Manager), to make security and management decisions to include housing, cell assignment, work, education, and program assignments, or as otherwise required by Federal, State, or local law."

Upon intake all prisoners are initially assessed utilizing the Screening for Risk of Victimization and Abusiveness form. As part of the intake process, all prisoners are assessed by medical, where a referral for mental health would be completed. Interview with the Classification Officer conducting the intake confirmed that should

	<p>an inmate disclose prior sexual victimization or have previously perpetrated sexual abuse, the medical/mental health intake process would generate the referral.</p> <p>Classification Staff further confirmed information obtained from the screening form is used to inform a limited number of staff members on work assignments, housing assignment or education assignments. There were no prisoners who disclosed sexual victimization housed at the Brig for the Auditor to interview.</p> <p>Provision (e):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Medical and mental health practitioners shall obtain informed consent from prisoners before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the prisoner is under the age of 18.”</p> <p>The Auditor reviewed a Limits on Confidentiality of Psychiatric Information form prisoners are required to sign prior to services. There is notification that states, “If you tell us a violation of military regulations or law, we will have to inform appropriate authority on this matter.” Prisoners sign the bottom of the form acknowledging they have read and understood the confidentiality limits. Interview with Medical/Mental Health staff confirmed that youthful offenders are not held at the Brig.</p> <p>Conclusion:</p> <p>Based on the review and analysis of all the available evidence, the auditor has determined the agency is fully compliant with this standard. No corrective action is needed.</p>
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Medical/Mental Health Logs 4. Interviews Conducted: Medical/Mental Health Staff 5. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states inmate victims of sexual abuse will receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgement.

Provision (a)(b)(c)(d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "Prisoner victims of sexual abuse will 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. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders will take preliminary steps to protect the victim pursuant to 115.62 and will immediately notify the DBS. The DBS will immediately notify Emergency Medical Services for evaluation and transport and will make notifications per the Incident Response Procedures form. Prisoner victims of sexual abuse will be offered timely information about and access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Treatment services will be provided to the victim without financial cost to them and regardless of whether the victim names the abuser(s) or cooperates with any investigation arising out of the incident."

Interviews with medical/mental health staff indicated that prisoners who are victims of sexual abuse received timely, unimpeded access to emergency medical treatment and crisis intervention. In addition, the interviews confirmed prisoner victims are offered emergency contraceptives and sexually transmitted infection prophylaxis at no cost, whether the victim names the abuser or refuses to cooperate with an investigation. All services provided are based on their professional judgement.

Should an incident of sexual abuse occur at the Brig, the victim would be transported to the Camp Lejeune Naval Hospital for treatment. There were no prisoners housed at the Brig who reported sexual abuse to interview.

Conclusion:

Based on the review and analysis of all the available evidence, the Auditor has determined the facility is fully compliant with this standard. No corrective action is needed.

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

Auditor Discussion

The Auditor reviewed, analyzed and retained the following evidence related to this standard:

1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ)
2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures
3. Memorandum for Record for 115.67 and 115.83
4. Interviews Conducted: Medical/Mental Health Staff
5. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states it does offer medical and mental health evaluation and as appropriate, treatment to all prisoners who have been victimized by sexual abuse in any prison, jail, lockup or juvenile facility. The Brig further reported that treatment services shall be provided to the victim without cost and whether the victim names the abuser or cooperates with any investigation out of the incident. The facility additionally reported that it does attempt to conduct a mental health evaluation of all known inmate on inmate abusers within 60 days of learning of such history.

Provision (a)(b)(c)(f)(g):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Brig will offer medical and mental health evaluations and, as appropriate, treatment to all prisoners who have been victimized by sexual abuse. The evaluation and treatment of such victims will 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. Victims will be provided medical and mental health services consistent with the community level of care. Prisoner victims of sexual abuse while incarcerated will be offered tests for sexually transmitted infections as medically appropriate. Ongoing treatment services will be 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."

Interviews with medical/mental health staff indicated that all inmate victims would receive evaluations and treatment, if they experience sexual abuse. This would include follow-up services, treatment plans and referrals for continued care outside of the corrections department, upon their release from the facility. The inmate victim would be tested for sexually transmitted diseases, without financial cost to the inmate regardless of if he names the abuser or cooperates with any investigations

	<p>that may come from the incident of sexual abuse. There were no prisoners housed at the Brig who reported sexual abuse for interview.</p> <p>Provisions (d)(e):</p> <p>The Brig only houses adult male offenders; therefore provisions (d) and (e) are not applicable.</p> <p>Provision (h):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Medical or Mental Health Officer will attempt to conduct a mental health evaluation of known prisoner-on-prisoner abusers as soon as possible, but not to exceed 60 days, within learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners."</p> <p>Review of the memorandum for record confirmed mental health evaluation of known prisoner-on-prisoner abusers would be completed within 60 days of intake and when deemed appropriate by mental health professionals. There were no prisoners housed at the Brig who were known prisoner-on-prisoner abusers to interview.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. PREA Incident Review 4. Interviews Conducted: Brig Commanding Officer, PREA Compliance Manager/ Incident Review Team Member 5. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states it does conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation and the review occurs within 30 days of conclusion of the investigation. The facility further reported there was one (1) allegation during the last year and a sexual abuse incident review was completed.

Provisions (a)(b)(c)(d)(e):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "A PREA Incident Review Board will ordinarily convene within 30 days of the conclusion or every sexual abuse investigation, unless the allegation has been determined to be Unfounded. The PREA Incident Review Board will consist of the BO, Programs Chief, Operations Chief, and the PREA Compliance Manager with input from relevant personnel, line supervisors, investigators, and medical or mental health practitioner. The board will consist of a minimum of three members. The PREA Incident Review Board will consider the following: Whether the allegation or investigation indicates a need to change policy or practice to better protect, detect, or respond to sexual abuse; Whether the incident or allegation was motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, intersex or gender nonconforming identification status, or perceived status, gang affiliation, or was motivated or otherwise caused by other group dynamics at the facility; Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; Assess the adequacy of staffing levels in that area during different shifts; and Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

PREA Incident Review Board chair will prepare a report of its findings. including but not necessarily limited to determinations made pursuant to paragraphs (a) and (e) of this section, and any recommendations for improvement. This report will be submitted to the Brig CO, the PREA Compliance Manager, and the CMC DC I&L Corrections) PREA Coordinator. The PREA Compliance Manager will maintain this documentation for file, archive and audit. The facility will implement the recommendations for improvement. or will document its reasons for not doing so in the PREA Annual Report. All staff will provide any and all documents to the PREA Compliance Manager for file, archive, and audit."

Interview with the PREA Compliance Manager indicated the facility has developed a review team which includes upper-management and has input from line supervisors, medical and mental health, investigators and the PREA Compliance Manager. In addition, he confirmed a review will be completed within 30 days of the completion of the investigation. The Auditor reviewed eleven (11) investigation files and confirmed the facility completed a sexual abuse incident review after the investigation. The review considered all elements required by subsection (d) of the standard, to include recommendations for improvement and also documents the reason for not following the recommendations made.

	<p>Conclusions:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"> 1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ) 2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures 3. Camp Lejeune Survey of Sexual Victimization Reports for 2020, 2021, 2022 4. Interviews Conducted: PREA Compliance Manager 5. Auditor Observations <p>In the Pre-Audit Questionnaire (PAQ), the facility states the agency does collect accurate uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The facility further reported that its data collection does include the information necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</p> <p>Provisions (a)(b)(c)(d)(f):</p> <p>MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The Brig will collect accurate, uniform data for every allegation of sexual abuse, sexual harassment and sexual misconduct using a standardized instrument and set of definitions from the most recent version or the Survey of Sexual Violence (SSV) conducted by the DOJ. The BO and PREA Compliance Manager will aggregate the incident-based sexual abuse data and forward the results to the CMC DC I&L (Corrections) PREA Coordinator annually. The incident-based data collected will include, at a minimum, the data necessary to answer all questions from the most recent version of the SSV. The PREA Compliance Manager will maintain, review and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The PREA Compliance Manager will submit all applicable data from the previous calendar year</p>

to the CMC DC I&L (Corrections) PREA Coordinator by 31May each year, who will forward the data to the DOJ ns required.”

Interview with the Agency PREA Coordinator confirms the agency reviews, collects, and maintains data needed from all incidents, to include reports, investigative files and the sexual abuse incident reviews, to complete the Department of Justice Survey of Sexual Victimization. The agency collects and aggregates data on an annual basis, utilizing a standardized instrument, definitions and PREA Incident Crime Types. All annual reports are readily available on the Agency website. The Auditor reviewed the 2022, 2021, and 2022 Survey od sexual Victimization forms and confirmed the standardized instrument and definitions are consistent with the definitions required by the Survey of Sexual Victimization.

Provision (e):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, “Marine Corps correctional facilities are not authorized to contract with agencies or other entities.”

The Auditor finds this provision of the standard not applicable.

Conclusion:

Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Auditor reviewed, analyzed and retained the following evidence related to this standard:</p> <ol style="list-style-type: none"><li data-bbox="256 1771 1118 1809">1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ)<li data-bbox="256 1845 1406 1921">2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act<li data-bbox="256 1957 619 1995">3. (PREA) Procedures<li data-bbox="256 2031 1461 2069">4. Interviews Conducted: Agency PREA Coordinator, PREA Compliance Manager,

5. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states the agency does review data collected in order to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies, practices and training. The facility further reported that that information is available to the public through the agency's website.

Provisions (a)(b)(c)(d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The PREA Compliance Manager will review data collected and aggregated pursuant to standard in order to assess and improve the effectiveness of the Brig's sexual abuse prevention, detection, and response policies, practices, and training, including: Identifying problem areas; Taking corrective action on an ongoing basis; and Preparing an Annual PREA Report of the findings and corrective actions and forwarding the report to CMC DC I&L (Corrections). This report will include a comparison of the current year's data and corrective actions with those from prior years as well as an assessment of the Brig's progress in addressing sexual abuse. The PREA Annual Report will be forwarded to CMC DC I&L (Corrections) PREA Coordinator for consolidation in order to make it readily available to the public through its website or through other means. The Brig will defer to CMC DC I&L (Corrections) regarding redaction of specific material from the reports when publication would present a clear and specific threat to the safety and security of the Brig, but must indicate the nature of the material redacted."

Interview with Agency PREA Coordinator confirmed confirms the agency reviews, collects, and maintains data needed from all incidents, to include reports, investigative files and the sexual abuse incident reviews, to complete the Department of Justice Survey of Sexual Victimization. The agency collects and aggregates data on an annual basis, utilizing a standardized instrument, definitions and PREA Incident Crime Types. Data is collected utilizing the Office of Inspector General's EGOR electronic system. All annual reports are readily available on the Agency website with information redacted as needed.

Conclusion:

Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.

115.89

Data storage, publication, and destruction

Auditor Overall Determination: Meets Standard

Auditor Discussion

The Auditor reviewed, analyzed and retained the following evidence related to this standard:

1. MCIEAST Regional BRIG Pre-Audit Questionnaire (PAQ)
2. MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures
3. Interviews Conducted: Agency PREA Coordinator
4. Auditor Observations

In the Pre-Audit Questionnaire (PAQ), the facility states that incident based and aggregated data are securely maintained. The facility further reported that agency policy requires aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts will be made readily available to the public at least annually through its website.

Provisions (a)(b)(c)(d):

MCIEAST Regional BRIG Standard Operating Procedures (SOP) Prison Rape Elimination Act (PREA) Procedures states, "The PREA Compliance Manager will ensure that data collected pursuant to 115.87 is securely retained. All aggregated sexual abuse data will be forwarded to CMC DC I&L (Corrections) for consolidation in order to make it readily available to the public annually through its website or through other means. Before submitting aggregated sexual abuse data to DC I&L (Corrections), the PREA Compliance Manager will remove all personal identifiers. CMC DC I&L (Corrections) shall maintain sexual abuse data (to include, incident reports, investigative reports, offender information, case disposition, and evaluation finding) collected pursuant to 115.87 for at least 10 years after the date of the initial collection unless legally required otherwise. The following references govern PREA requirements: Executive Memorandum (POTUS), Implementing the Prison Rape Elimination Act; CMC DC I&L (Corrections) Policy Letter 1-14, Prison Rape Elimination Act; U.S. Department of Justice. Bureau of Justice Statistics, Prisoner Rape Elimination Act (PREA) Standards for Prisons and Jails; National Institute of Corrections Staffing Analysis Workbook; SECNAVINST 1640.9C (Department of the Navy Corrections Manual); MCO I 752.5B (Sexual Assault Prevention and Response (SAPR) Program); BUMED INSTRUCTION 6310.11A (Sexual Assault Prevention and Response Medical-Forensic Program; DoDI 6495.02p (Sexual Assault Prevention and Response (SA PR) Program); OUSD (P&R) Directive-type Memorandum (DTM) (Reporting Options for Prisoners in Military Correctional Facilities under the Prison Rape Elimination Act); SECNAVINST 5720.42F (Department of Navy Freedom of Information Act (FOIA) Program); Manual for Courts-Martial (MCM), United States (2012 Edition); Title 10, Chapter 47, United States Code; DC I&L Policy Letter 2-17 Searches for Transgender and Intersex Prisoners with USMC Confinement Facilities; and DC I&L Policy Letter 3-17 Disciplinary Sanctions for Inmates."

	<p>Interview with the Agency PREA Coordinator confirmed that records are pursuant to this standard are securely maintained. Review of the Agency website confirmed aggregated sexual abuse data is available to the public and personal identifiers have been removed. This data is maintained for at least ten (10) years after the data of collection.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Review of the MCIEAST Regional Brig website confirmed the Brig has received at least one PREA audit every 3-year cycle. The Auditor was provided full access to all areas of the facility and observe the facility practices. Prior to the audit, during the audit, and after the onsite review the agency and facility provided the Auditor requested documents. Private interview space was provided to the Auditor for conducting staff and inmate interviews. The prisoner and staff interviews were conducted in a private office. There were signs posted throughout the facility that advised staff, prisoners, and facility visitors where they could send confidential information or correspondence to the Auditor. The Auditor did not receive any correspondence from staff, prisoners, or visitors (third party). The Auditor Notice was observed in all common areas and housing units. The Auditor notice provided contact information to contact the Auditor prior to the onsite, during the onsite and after the onsite. In addition, the Auditor Notice included, "CONFIDENTIALITY - All written and verbal correspondence and disclosures provided to the designated auditor are confidential and will not be disclosed unless required by law. Interviews with random staff and prisoners indicated they were all aware of the PREA Audit, and indicated they had seen the Auditor Notice. Prisoners indicated the notice had been posted for quite awhile.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>

115.403	Audit contents and findings
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	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Review of the Agency website confirmed PREA annual reports have been uploaded and made available to the public.</p> <p>Conclusion:</p> <p>Based on examination and analysis of the evidence, the auditor has determined the facility is compliant with this standard. No corrective action is required.</p>

Appendix: Provision Findings		
115.11 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	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.)	yes
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	yes

	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	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

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

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

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

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

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

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and	yes

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	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	yes

	suspicious of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective	yes

	screening instrument?	
115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10)	yes

	Whether the inmate is detained solely for civil immigration purposes?	
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive	yes

	information is not exploited to the inmate's detriment by staff or other inmates?	
115.42 (a) Use of screening information		
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b) Use of screening information		
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c) Use of screening information		
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would	yes

	present management or security problems?	
115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing	yes

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	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 can be arranged?	yes
115.43 (e) Protective Custody		
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a) Inmate reporting		
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b) Inmate reporting		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	yes

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of	yes

	sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations	yes

	of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes

	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	na
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

	abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

	evidence sufficient to substantiate the allegation?	
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse	

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	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 § 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.)	na
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
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	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	yes

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

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	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.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403	Audit contents and findings	

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