

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS

NATIONAL
PREA
RESOURCE
CENTER



BJA
Bureau of Justice Assistance
U.S. Department of Justice

Name of facility: Piedmont Regional Jail				
Physical address: 801 Industrial Park Rd., Farmville, VA 23901				
Date report submitted: November 5, 2014				
Auditor Information Jeffery L. Newton, CJM				
Address: 12607 Bay Hill Dr., Chester, VA 23836				
Email: jeff@bighouseLLC.com				
Telephone number: 757-377-6789				
Date of facility visit: October 5-6, 2014 with a follow-up visit conducted November 1, 2014				
Facility Information				
Facility mailing address: (if different from above)				
Telephone number: 434-392-1601				
Piedmont Regional Jail is:	<input type="checkbox"/> Military		<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit		<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input checked="" type="checkbox"/> Other – Regional			
Facility Type:	<input checked="" type="checkbox"/> Jail		<input type="checkbox"/> Prison	
Name of PREA Compliance Manager: Bridget Tisdale			Title:	Sergeant
Email address: brtisdale@prjva.org			Telephone number:	434-392-1601
Agency Information				
Name of agency: Piedmont Regional Jail Board				
Governing Board or parent agency: (if applicable)				
Physical address: 801 Industrial Park Rd., Farmville, VA 23901				
Mailing address: (if different from above)				
Telephone number: 434-392-1601				
Agency Chief Executive Officer				
Name: Donald L Hunter		Title:	Superintendent	
Email address: dlhunter@prjva.org		Telephone number:	434-392-1601 ext 237	
Agency-Wide PREA Coordinator				
Name: Jim Davis		Title:	Director of Compliance	
Email address: jhdavis@prjva.org		Telephone number:	434-392-1601 ext 242	

AUDIT FINDINGS

NARRATIVE:

The audit of Piedmont Regional Jail (here after referred to as PRJ) was conducted on October 5 -6, 2014 with a follow-up visit November 1, 2014 by Jeffery L. Newton, Certified PREA auditor. Additional material was reviewed after a correction action period from the date of the initial report through January 2015.

An entrance meeting October 5, 2014 was held with facility representatives. The following staff were in attendance: Major Robert Pugh, Major Stephen Agnew, Captain Kent Lee, Lieutenant David Moore, Lieutenant Sherard Tisdale, Lieutenant Michael Jenkins, Lieutenant Royal Eanes, Lieutenant Raymond Ridley, PREA Coordinator James Davis, Facility PREA Compliance Manager Sergeant Bridgette Tisdale and Classification Officer Melody Fishburne. Following the entrance meeting I toured the PRJ from 9:30 – 11:00 with the same facilities representatives.

I asked for an alpha listing of all inmates housed at PRJ and randomly selected one inmate from each housing unit. There were no hearing/vision impairment inmates, there were no non-English speaking inmates and, there were no mentally disabled inmates, transgender, intersex, gender nonconforming present in the facility. I was able to interview one lesbian inmate, one male gay inmate and one male inmate that had reported being previously sexually abused. I also asked for a shift roster and selected supervisors and officers from the three shifts working during my on-site visit and interviewed a total of three Sergeants and seven officers.

There were no sexual assault/harassment allegation cases reported within the past year. However, a recent allegation of sexual assault had been made within seven days of the scheduled audit. The allegation is currently under investigation by the Piedmont Regional Jail Board, PREA Investigator.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Piedmont Regional Jail was opened in May of 1988 to provide housing for inmates from the surrounding six (6) counties: Amelia, Buckingham, Cumberland, Lunenburg, Nottoway and Prince Edward. Piedmont Regional Jail began housing Federal inmates in 1990. In 2001 the Jail added "I" Building and "L" Building in 2005. PRJ currently has 9 Housing Pods, 8 Dormitory Housing Units and 5 Special Population Housing Units.

The Jail currently has a total of seven-hundred thirty seven (737) beds available to house inmates.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 0

Number of standards met: 39

Number of standards not met: 0

Number of standards not applicable: 4

115.11 Zero Tolerance

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

Auditor comments:

Based on review of policy 518 Section III, paragraph C. Based on interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager, staff and inmates.

The Piedmont Regional Jail has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Piedmont Regional Jail 's approach to preventing, detecting, and responding to such conduct.

Piedmont Regional Jail employs and designates an upper-level, agency-wide PREA coordinator with sufficient time and Board to develop, implement, and oversee agency efforts to comply with the PREA standards as well as appointing a PREA Compliance Manager with sufficient time to oversee the facility's efforts to comply with the PREA standards.

115.12 Contracting with other agencies for confinement of inmates

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

Auditor comments:

Based on interviews with the Facility Command Staff, PREA Coordinator, and PREA Compliance Manager there are no contracts for the confinement of their inmates.

115.13 Supervision and monitoring

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

Auditor comments:

Based on policy 512, Section II, Paragraph E and policy 518, Section III, paragraph W8 and interviews with the Superintendent and PREA Coordinator. Additionally, I reviewed the Piedmont Regional Jail Board 2014 Staffing Analysis and shift rosters.

The Piedmont Regional Jail Board, has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect inmates against sexual abuse.

In circumstances where the staffing plan was not complied with, Piedmont Regional Jail Board, documented and justified all deviations from the plan. I reviewed shift rosters demonstrating documentation of deviations from the plan.

The Piedmont Regional Jail Board completes an annual review, in consultation with the PREA Coordinator required to assess, determine, and document whether adjustments are needed.

115.14 Youthful inmates

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of policy 518 Section III, paragraph B, subparagraph 6 and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager, staff and inmates.

The Piedmont Regional Jail does not house youthful offenders with adult inmates. Youthful offenders have sight and sound separation from adult inmates. Youthful offenders do not have physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters. Youthful offenders are accompanied by staff whenever escorted outside their housing unit.

115.15 Limits to cross gender viewing and searches

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of policy 518, Section III, paragraph O, Policy 514 Section II, paragraph P and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager, staff and inmates.

The Piedmont Regional Jail does not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances.

The Piedmont Regional Jail conducts searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

The Piedmont Regional Jail has policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit. However, during the tour in number problem areas were identified where nonmedical staff members of the opposite gender had potential to observe inmates of the opposite gender breasts, buttocks, or genitalia while showering.

The Piedmont Regional Jail does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it is determined during conversations with the 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.

115.16	Inmates with disabilities and limited English speaking
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☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of policy 518, Section III, paragraph N, Subparagraph 9 and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager, staff and inmates. Procedures for interpreting services are available to all staff from Certified Languages International. Unfortunately, there were no inmates in the facility to interview with limited English speaking.

Piedmont Regional Jail, takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of Piedmont Regional Jail 's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In the unlikely event that a visually impaired individual is admitted to the facility, staff will read the required information to the offender to ensure they understand the rules of facility, have access to information about services and understand their rights related to PREA. A English/Spanish handbook is available. Inmate video is done in English with English/Spanish subtitles, any other language barrier training is provided by the translation service.

Piedmont Regional Jail does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. There were no reported instances in the previous 12 months where the services of a translator was required.

115.17**Hiring and promotion decisions**

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

Auditor comments:

Based on review of policy 518, Section III, paragraph Q and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and Human Resource Director. Review of personnel files, employment applications, documentation of five-year background screenings and background screenings for contractors.

Piedmont Regional Jail does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor who may have contact with inmates, who has engaged in sexual abuse in any criminal justice facility, 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 above.

Piedmont Regional Jail considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

Piedmont Regional Jail performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates and performs a records check at least every five years of current employees and contractors who may have contact with inmates.

115.18**Upgrades to facilities and technology**

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

Auditor comments:

Based on interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and the Maintenance Supervisor, the Piedmont Regional Jail considers how such technology may enhance Piedmont Regional Jail's ability to protect inmates from sexual abuse. There have been no substantial or modifications to existing facilities. However, the facility is currently preparing to retrofit the entire video monitoring system in the next six months.

Recommendation was made to add cameras to the kitchen dry storage area, recreation yard sally port, commissary storage area and the classroom (I was able to verify these additional cameras were added during my November 1, 2014 follow-up visit).

115.21**Evidence protocol and forensic medical exams**

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

Auditor comments:

Based on review of policy 518, Section III, paragraph L, subparagraphs 12-15 and interviews with the Facility Command Staff, PREA Coordinator, and PREA Compliance Manager. Review of MOU between Prince Edward Sheriff's Office and the Piedmont Regional Jail and the MOU between the Piedmont Regional Jail and the YWCA & Lynchburg Hospital.

To the extent Piedmont Regional Jail is responsible for investigating allegations of sexual abuse; Piedmont Regional Jail follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions

Piedmont Regional Jail offers all victims of sexual abuse access to forensic medical examinations, at the Lynchburg Hospital, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible.

Piedmont Regional Jail makes available to the victim a victim advocate from the YWCA.

As requested by the victim, a victim advocate, accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals.

To the extent Piedmont Regional Jail itself is not responsible for investigating allegations of sexual abuse, Piedmont Regional Jail requests that the investigating agency follow the requirements listed above. Prince Edward Sheriff's Office conducts all investigation once they are deemed criminal, based on the preponderance of the evidence.

115.22**Referrals of allegations for investigations**

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

Auditor comments:

Based on review of policy 518, Section III, paragraph R, and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and PREA Lieutenant.

Piedmont Regional Jail ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Piedmont Regional Jail has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal Board to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. Piedmont

Regional Jail documents all such referrals and has a Memorandum of Understanding with the Prince Edward Sheriff's Office.

115.31 Employee training

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

Auditor comments:

Based on review of policy 518, Section III, paragraph N, and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and interviews with random staff. Piedmont Regional Jail trains all employees who have contact with inmates on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;
- (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- (3) Inmates' right to be free from sexual abuse and sexual harassment;
- (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with inmates;
- (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

Officers receive 2 hours of training in the academy within their first year of employment and receive 1.5 hours during orientation (prior to having unsupervised contact with inmates) and annual training to ensure all employees remain current on their responsibilities related to ensuring inmates rights related to PREA.

Piedmont Regional Jail documents, through employee signature the employee's understanding of training they have received.

115.32 Volunteer and contractors training

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

Auditor comments:

Based on review of policy 518, Section III, paragraph N, subparagraph 4 and review of training curriculum and volunteer and contractor training records. Unfortunately, there were no volunteers or contractors available for interview.

Piedmont Regional Jail ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Piedmont Regional Jail sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

Volunteers and contractors receive the same training as line staff. All volunteers and contractors who have contact with inmates are notified of Piedmont Regional Jail's, zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Piedmont Regional Jail has documentation confirming that volunteers and contractors understand the training they have received. Reviewed training records on volunteers and contractors.

115.33 Inmate education

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of policy 518 Section III, paragraph K, Subparagraph 1 and interviews Facility Command Staff, PREA Coordinator, PREA Compliance Manager with random inmates and intake staff.

During the intake process, inmates receive information explaining Piedmont Regional Jail's, zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Weekenders are processed through intake the same as other inmates.

Piedmont Regional Jail provides a comprehensive education to inmates through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.

Piedmont Regional Jail provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. There is documentation of inmate participation in these education sessions. In the unlikely event that a visually impaired individual is admitted to the facility, staff will read the required information to the offender to ensure they understand the rules of facility, have access to information about services and understand their rights related to PREA. A English/Spanish handbook is available. Inmate video is done in English with Spanish subtitles, any other language barrier training is provided by the translation service.

115.34**Specialized training: Investigators**

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

Auditor comments:

Based on review of policy 518 Section III, paragraph K, Subparagraph 1 and review of the Internal Affairs Lieutenant training certificate from the *PREA: Investigating Sexual Abuse in Confinement Settings* training conducted by the National Institute of Corrections and interview with the Internal Affairs Lieutenant.

In addition to the general training provided to all employees Piedmont Regional Jail ensures that the in-house investigator has received training in conducting investigations in confinement settings.

Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Piedmont Regional Jail maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

115.35**Specialized training: Medical and mental health care**

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

Auditor comments:

Based on review of policy 518 Section III, paragraph N, Subparagraph 25, policy 401 Section II, paragraph L, subparagraph 25 and review of curriculum provided based on the following resources Sexual Assault in Jail and Juvenile Facilities: Promising Practices for Prevention and Response Final Report, June 2010 Preventing and Responding to Corrections-Based Sexual Abuse: A Guide for Community Corrections Professionals and review of training attendance rosters.

Piedmont Regional Jail ensures that all full and part-time medical and mental health care practitioners who work regularly have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

Piedmont Regional Jail maintains documentation that medical and mental health practitioners have received the training. Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers.

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

Auditor comments:

Based on review of policy 201 Section II the Piedmont Regional Jail uses an Objective Jail Classification process an Initial Custody & Classification questionnaire and Sexual Predation and Victimization Assessment. Based on interviews with random inmates, classification officer and the PREA Compliance Manager.

All inmates are assessed during an intake screening and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates.

Intake screenings take place within 72 hours of arrival at Piedmont Regional Jail. Piedmont Regional Jail uses an objective screening instrument.

The intake screening considers, at a minimum, the following criteria to assess inmates for risk of sexual victimization:

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

The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Piedmont Regional Jail in assessing inmates for risk of being sexually abusive.

Within 30 days from the inmate's arrival at Piedmont Regional Jail a reassessment of the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Piedmont Regional Jail since the intake screening.

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

Inmates are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked.

Piedmont Regional Jail implements appropriate controls on the dissemination within Piedmont Regional Jail of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates. All

files are controlled by administrative personnel behind locked doors and maintained in each inmates Classification files.

Corrective Action Plan:

1. Without data to prove that you've actually done the assessment it's difficult to determine if you have a custom and practice concerning screening inmates and conducting the required 30-day re-assessment.
2. Documented coordination needs to occur between mental health, classification and the PREA Investigator. Implement documentation of the 30 day re-assessment.
3. Recommendation Only - Form Multi-Disciplinary Team (MDT) (Mental Health, Classification, PREA Inv etc...) – may include PREA Coordinator
4. Add language to policy documenting the 30 day review process
5. Provide 60-90 days of data to support practice and policy changes.

Corrective Action:

1. Updated SOP 201 implemented to include detailed procedures for processing intake screens within 72 hours of intake to the facility.
2. Updated SOP 201 implemented to include procedures for referral to mental health and coordination between mental health, classification and the PREA Investigator.
3. Updated SOP 201 implemented to include procedures for 14 day and 30 assessments by Mental Health.
4. Documentation provided for December 2014 and January 2015 as demonstration that the provisions outlined in SOP 201 were implemented and executed as the policy requires.

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

Auditor comments:

Based on review of policy 201 Section II, paragraph K and interviews with the classification officer and PREA Compliance Manager.

Piedmont Regional Jail uses information from the risk screening to decide 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.

Piedmont Regional Jail makes individualized determinations about how to ensure the safety of each inmate.

In deciding housing and programming for a transgender or intersex inmate Piedmont Regional Jail considers on a case-by-case basis whether the placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.

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

A transgender or intersex inmate's own views with respect to his or her own safety are to be given serious consideration. The showers are designed in such a way that allows privacy for all inmates.

Piedmont Regional Jail does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status. However, staff interviewed do not recall ever processing a transgender or intersex inmate.

Corrective Action Plan:

1. Add language to as to how risk assessment information controlled?
2. Clearly identify on Screening Form how information is to be used.

Corrective Action:

1. Updated SOP 201 implemented to include procedures for the control of risk assessment forms.
2. Updated Screening Form implemented.

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

Auditor comments:

Based on review of policy 517, Section II, paragraph B and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and staff who supervise segregated inmates. No inmates have been placed in involuntary segregation.

Inmates at high risk for sexual victimization are not placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers.

Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If Piedmont Regional Jail restricts access to programs, privileges, education, or work opportunities, Piedmont Regional Jail documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.

Piedmont Regional Jail assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment are not ordinarily exceed a period of 30 days. If involuntary segregated housing assignment is made Piedmont Regional Jail clearly documents the basis for Piedmont Regional Jail's, concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Every 30 days a review is performed to determine whether there is a continuing need for separation from the general population.

115.51**Inmate reporting**

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

Auditor comments:

Based on review of policy 518, Section III, paragraph H, subparagraph 5, Inmate Handbook and review of Inmate Rights form. The inmates have a hotline they can call that is forwarded directly to the Southside Center for Prevention of Violence. Based on interviews with random staff, inmates and review of the Memorandum of Understanding with the Southside Center for Prevention of Violence.

Piedmont Regional Jail provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmate request forms have how to report sexual abuse and the hotline number posted in close proximity to phones in the inmate housing units as a constant reminder.

Piedmont Regional Jail provides at least one way for inmates to report abuse or harassment to the Southside Center for Violence Prevention, Inc a private entity that is not part of Piedmont Regional Jail and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly documents any verbal reports.

Piedmont Regional Jail provides a hotline for inmates to privately report sexual abuse and sexual harassment of inmates.

115.52**Exhaustion of administrative remedies**

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

Auditor comments:

Based on policy 202, Section II, Paragraph B7 and the Inmate Handbook, the Piedmont Regional Jail does not accept inmate grievances in relation to sexual abuse. Inmates alleging sexual abuse must utilize reporting options delineated in Policy 518 and as outlined in the Inmate Handbook.

115.53**Inmate access to outside confidential support services**

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

Auditor comments:

Based on Memorandum of Understanding with the YWCA and interviews with random inmates.

Piedmont Regional Jail provides 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 for the YWCA. Piedmont Regional Jail enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.

Piedmont Regional Jail informs 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.

115.54**Third party reporting**

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

Auditor comments:

Piedmont Regional Jail has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of an inmate. The information is publicly posted in the lobby and available on the agency webpage <http://prjva.org/prea>

115.61**Staff and agency reporting duties**

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

Based on review of policy 518, Section III, paragraph M and interviews with random line and supervisory staff and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and medical/mental health staff.

Piedmont Regional Jail requires 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 Piedmont Regional Jail retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Apart from reporting to designated supervisors or officials, staff do not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

Piedmont Regional Jail reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Piedmont Regional Jail PREA Lieutenant.

115.62 Agency protection duties

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of policy 518, Section III, paragraph B and interviews with random line and supervisory staff, the Facility Command Staff, PREA Coordinator, and PREA Compliance Manager.

Immediate action is taken to protect inmates when Piedmont Regional Jail learns that an inmate is subject to a substantial risk of imminent sexual abuse

115.63 Reporting to other confinement facilities

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based review of policy 518, Section III, paragraph H, subparagraph11 and interviews with the Facility Command Staff, PREA Coordinator, and PREA Compliance Manager.

Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Piedmont Regional Jail that received the allegation notifies the head of correctional facility or appropriate office of the correctional facility where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation; all actions are thoroughly documented.

115.64**Staff first responder duties**

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

Auditor comments:

Based review of policy 518, Section III, paragraph H, and interviews with random line and supervisory staff who are first responders.

Upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond separates the alleged victim and abuser; preserves and protects any crime scene until appropriate steps can be taken to collect any evidence; and if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and if the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

If the first staff responder is not a security staff member, the responder request that the alleged victim not take any actions that could destroy physical evidence, and then notifies security staff.

115.65**Coordinated response**

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

Auditor comments:

Based review of policy 518, Section III, paragraph H, and interviews with random line and supervisory staff who are first responders.

Piedmont Regional Jail has 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.

115.66**Preservation of ability to protect inmates from contact with abusers**

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

Auditor comments:

Based on interview with Facility Command Staff, PREA Coordinator, and PREA Compliance Manager, Virginia does not have collective bargaining agreements.

115.67**Agency protection against retaliation**

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

Auditor comments:

Based on review of 518, section III, subparagraph T and interviews with the Facility Command Staff, PREA Coordinator, and PREA Compliance Manager.

Piedmont Regional Jail has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperates with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and designate the PREA Coordinator with monitoring retaliation. The PREA Coordinator monitors weekly for 90 days.

Piedmont Regional Jail has 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 that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, the Piedmont Regional Jail monitors the conduct and treatment of inmates or staff who reported the sexual abuse and 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, and are act promptly to remedy any such retaliation. There are periodic status checks performed. Items Piedmont Regional Jail monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Piedmont Regional Jail continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

If any other individual who cooperates with an investigation expresses a fear of retaliation, Piedmont Regional Jail takes appropriate measures to protect that individual against retaliation.

115.68**Post allegation protective custody**

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

Auditor comments, including corrective actions needed if does not meet standard

Based on review of policy 517, Section II, paragraph A and interviews with Facility Command Staff, PREA Coordinator, and PREA Compliance Manager there were no inmates in segregation for risk of sexual victimization during the audit.

Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse receive all the same rights and privileges as general population inmates.

115.71**Criminal and administrative agency investigation**

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

Auditor comments:

Based on review of 518 and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and PREA Investigator. At the time the audit no complete reports were available for review.

The Piedmont Regional Jail conducts investigations promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

Where sexual abuse is alleged, Piedmont Regional Jail uses investigators who have received special training in sexual abuse investigations.

Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.

When the quality of evidence appears to support criminal prosecution, Piedmont Regional Jail conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. All criminal prosecution cases are referred to Prince Edward Sheriff's Office.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. No agency requires an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

Administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are 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 are documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

Substantiated allegations of conduct that appears to be criminal are referred for prosecution to the Prince Edward Sheriff's Office.

Piedmont Regional Jail retains all written reports for as long as the alleged abuser is incarcerated or employed by Piedmont Regional Jail plus five years.

The departure of the alleged abuser or victim from the employment or control of Piedmont Regional Jail or agency does not provide a basis for terminating an investigation.

115.72 Evidentiary standard for administrative investigation

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

Auditor comments:

Based on review of 518, section III, subparagraph R, subparagraph 14 and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and PREA Investigator.

Piedmont Regional Jail imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

115.73 Reporting to inmates

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

Auditor comments:

Based on review of 518, section III, subparagraph R, and interviews with the and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and PREA Investigator.

Following an investigation into an inmate's allegation that they suffered sexual abuse in an agency facility, Piedmont Regional Jail informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If Piedmont Regional Jail did not conduct the investigation, it will request the relevant information from the investigative agency in order to inform the inmate.

Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, Piedmont Regional Jail subsequently informs the inmate unless Piedmont Regional Jail has determined that the allegation is unfounded) whenever the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at Piedmont Regional Jail or Piedmont Regional Jail learns that the staff member has been indicted on a charge related to sexual abuse within Piedmont Regional Jail; or Piedmont Regional Jail learns that the staff member has been convicted on a charge related to sexual abuse within Piedmont Regional Jail.

Following an inmate's allegation that they had been sexually abused by another inmate, Piedmont Regional Jail subsequently informs the alleged victim whenever Piedmont Regional Jail learns that the alleged abuser has been indicted on a charge related to sexual abuse within Piedmont Regional Jail or Piedmont Regional Jail learns that the alleged abuser has been convicted on a charge related to sexual abuse within Piedmont Regional Jail. All such notifications or attempted notifications are documented.

An agency's obligation to report under this standard are terminated if the inmate is released from Piedmont Regional Jail's custody.

115.76 Disciplinary sanctions for staff

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

Auditor comments:

Based on review of 518, section III, subparagraph S, and interviews with the and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and PREA Investigator.

Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

115.77 Corrective action for contractors and volunteers

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of 518, section III, subparagraph S, and interviews with the and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager and PREA Investigator.

Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

Piedmont Regional Jail takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

115.78	Disciplinary sanctions for inmates
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☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of 518, section III, subparagraph S, and interviews with the and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager, PREA Investigator and mental health staff.

Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

Sanctions are 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.

The disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

Piedmont Regional Jail assesses whether to offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, on a case-by-case basis.

Piedmont Regional Jail disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

A report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred are not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Piedmont Regional Jail prohibits all sexual activity between inmates and may discipline inmates for such activity.

115.81**Medical and Mental health screening; history of sexual abuse**

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

Auditor comments:

Based on review of policy 401, Section II, paragraph G and interviews with staff responsible for risk screening and medical/mental health staff

If the screening indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, 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.

If the screening indicates that an inmate has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the inmate 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 is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

Medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting.

Corrective Action Plan:

1. Screening within 14 days must be documented
2. Feedback provided to classification officer to be used for the 30-day re-assessment of classification and housing.

Corrective Action:

1. Updated SOP 201 implemented to include procedures for referral to mental health and coordination between mental health, classification and the PREA Investigator.
2. Updated SOP 201 implemented to include procedures for 14 day and 30 assessments by Mental Health.
3. Documentation provided for December 2014 and January 2015 as demonstration that the provisions outlined in SOP 201 were implemented and executed as the policy requires.

115.82**Access to emergency medical and mental health services**

- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of policy 401, Section II, paragraph D and interviews with staff responsible for risk screening and medical/mental health staff

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.

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 take preliminary steps to protect the victim and are immediately notify the appropriate medical and mental health practitioners.

Inmate victims of sexual abuse while incarcerated are 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.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

115.83

Ongoing medical and mental health care for sexual abuse victims

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of policy 401, Section II, paragraph K and interviews with staff responsible for risk screening and medical/mental health staff

Piedmont Regional Jail offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in the jail.

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.

Piedmont Regional Jail provides such victims with medical and mental health services consistent with the community level of care.

Inmate victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results, victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

115.86**Sexual abuse incident reviews**

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

Auditor comments:

Based on review of 518, section III, subparagraph V, and interviews with the and interviews with the Facility Command Staff, PREA Coordinator, PREA Compliance Manager, PREA Investigator. At the time of the audit no critical incident reviews had been required to be conducted.

Piedmont Regional Jail conducts 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. This review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at Piedmont Regional Jail and they examine the area in Piedmont Regional Jail where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

115.87**Data collection**

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

Auditor comments:

Based on review of 518, section III, subparagraph W, and interviews with the and interviews with the Facility Command Staff, PREA Coordinator, and PREA Compliance Manager.

Piedmont Regional Jail collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, and aggregates the incident-based sexual abuse data at least annually.

The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

Piedmont Regional Jail is exempt from submitting the annual Survey of Sexual Violence conducted by the Department of Justice; however, the Piedmont Regional Jail maintains,

reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

If required, Piedmont Regional Jail will provide all such data from the previous calendar year to the Department of Justice no later than June 30. No requests have been made.

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

Auditor comments:

Based on review of 518, section III, subparagraph W, and interviews with the and interviews with the Facility Command Staff, PREA Coordinator, and PREA Compliance Manager.

Piedmont Regional Jail does not review data collected to assess and improve the effectiveness of its 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 report of its findings and corrective.

Corrective Action Plan:

1. collect data for CY 14.
2. collate data in accordance with most recent version of the Department of Justice sexual violence survey.
3. Produce annual analysis of data and have Superintendent approve the annual report.
4. In subsequent years compare each years report.

Corrective Action:

1. Data collection conducted for 2014.
2. Data collected is in accordancw with the most recent version of the Departmetn of Justice Sexual Violence Survey.
3. Annual Report has been approved by the Superintendent for 2014 and is already posted to the PRJ web page for public consumption.
4. Since this is the intial PREA Audit the report does not reflect a comparison to previous years at the data was not available.

115.89	Data storage, publication and destruction
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- ☐ Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- ☐ Does Not Meet Standard (requires corrective action)

Auditor comments:

Based on review of 518, section III, subparagraph W, and interviews with the and interviews with the Facility Command Staff, PREA Coordinator, and PREA Compliance Manager.

Piedmont Regional Jail makes 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.

All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires.

AUDITOR CERTIFICATION:

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

Jeffery L. Newton, CJM
DOJ PREA Certified Auditor

February 9, 2015