

PREA Facility Audit Report: Final

Name of Facility: Clear Creek County Jail

Facility Type: Prison / Jail

Date Interim Report Submitted: 06/30/2025

Date Final Report Submitted: 08/08/2025

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: Karen d. Murray	Date of Signature: 08/08/2025

AUDITOR INFORMATION	
Auditor name:	Murray, Karen
Email:	kdmconsults1@gmail.com
Start Date of On-Site Audit:	05/28/2025
End Date of On-Site Audit:	05/29/2025

FACILITY INFORMATION	
Facility name:	Clear Creek County Jail
Facility physical address:	405 Argentine Street, Georgetown, Colorado - 80444
Facility mailing address:	P.o. box 2000, Georgetown, Colorado - 80444

Primary Contact

Name:	Matthew Harris
Email Address:	mharris@clearcreeksheriff.us
Telephone Number:	303-679-2380

Warden/Jail Administrator/Sheriff/Director	
Name:	Isaac Lucas
Email Address:	ilucas@clearcreeksheriff.us
Telephone Number:	303-679-2407

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

Facility Health Service Administrator On-site	
Name:	Isaac Lucas
Email Address:	ilucas@clearcreeksheriff.us
Telephone Number:	303-679-2407

Facility Characteristics	
Designed facility capacity:	103
Current population of facility:	36
Average daily population for the past 12 months:	38
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both women/girls and men/boys

In the past 12 months, which population(s) has the facility held? 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)	
Age range of population:	21-69
Facility security levels/inmate custody levels:	Minimum, Medium, Maximum, Alternative Housing, Administrative Segregation,
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	23
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	1
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	11

AGENCY INFORMATION	
Name of agency:	Clear Creek County Sheriff's Office
Governing authority or parent agency (if applicable):	
Physical Address:	405 Argentine Street, Georgetown, Colorado - 80444
Mailing Address:	405 argentine st , Georgetown, Colorado - 80444
Telephone number:	303-679-2396

Agency Chief Executive Officer Information:

Name:	Matthew Harris
Email Address:	mharris@clearcreeksheriff.us
Telephone Number:	303-679-2376

Agency-Wide PREA Coordinator Information			
Name:	Isaac Lucas	Email Address:	ilucas@clearcreeksheriff.us

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:	
2	<ul style="list-style-type: none"> • 115.17 - Hiring and promotion decisions • 115.83 - Ongoing medical and mental health care for sexual abuse victims and abusers
Number of standards met:	
43	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

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

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit: 2025-05-28

2. End date of the onsite portion of the audit: 2025-05-29

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?

Yes
 No

a. Identify the community-based organization(s) or victim advocates with whom you communicated: Peaceworks - hotline and victim advocate
Third Party via facility website

AUDITED FACILITY INFORMATION

14. Designated facility capacity: 103

15. Average daily population for the past 12 months: 35

16. Number of inmate/resident/detainee housing units: 6

17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?

Yes
 No
 Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	42
25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	5
26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	5
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	5
28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	5
29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	5
30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	1

<p>31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>Please note targeted categories for blind, deaf, physically handicapped, cognitive and LEP were all reported as five thus the reason why the fields above all state five.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>22</p>
<p>37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>4</p>

38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	22
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	5
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input type="checkbox"/> Age <input type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The facility provided rosters of targeted and random inmates, once the Auditor chose five targeted inmates random inmates were selected by housing unit and gender to ensure a representative sample was chosen .

43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	5
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. 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>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>After review of facility rosters and interviews with specialized staff this category of inmates did not appear to be in the facility during the onsite review.</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>2</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>After review of facility rosters and interviews with specialized staff this category of inmates did not appear to be in the facility during the onsite review.</p>
<p>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>After review of facility rosters and interviews with specialized staff this category of inmates did not appear to be in the facility during the onsite review.</p>
<p>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>After review of facility rosters and interviews with specialized staff this category of inmates did not appear to be in the facility during the onsite review.</p>
<p>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>After review of facility rosters and interviews with specialized staff this category of inmates did not appear to be in the facility during the onsite review.</p>
<p>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>2</p>

<p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>After review of facility rosters and interviews with specialized staff this category of inmates did not appear to be in the facility during the onsite review.</p>
<p>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>Please note two offenders identified as cognitive were also victims of sexual abuse and of the LGBTI community.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>58. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>9</p>

<p>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)</p>	<p><input type="checkbox"/> Too many staff declined to participate in interviews.</p> <p><input type="checkbox"/> Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles).</p> <p><input checked="" type="checkbox"/> Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews.</p> <p><input type="checkbox"/> Other</p>
<p>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>All detention staff from each shift were interviewed.</p>

Specialized Staff, Volunteers, and Contractor Interviews

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

62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	10
63. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
65. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
66. Were you able to interview the PREA Compliance Manager?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

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

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

<p>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>No text provided.</p>
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Documentation Sampling

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

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

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

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

1

<p>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

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

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

Non-certified Support Staff

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

Yes

No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

The audited facility or its parent agency

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

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

Other

Standards	
Auditor Overall Determination Definitions	
<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>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Clear Creek County Citizens Organization Chart, date 3.17.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Inmates 2. Targeted Inmates 3. Deputy Sheriffs

4. Administrative Personnel
5. Detentions Captain / PREA Coordinator
6. Undersheriff

Formal interviews with five targeted, five random, and seven informal interviews with inmates, 17 formal interviews with staff, two interviews with volunteers and one interview with a contractor, review of inmate and personnel files, review of facility and agency protocols and a facility tour, it is evident that this facility interweaves requirements of PREA in their daily protocols. Both inmates and staff could speak to facility PREA practices and protocols as is described in the agency zero tolerance policy.

Informal and formal interviews with inmates demonstrated 10 of 10 interviews resulted in inmates stating each felt sexually safe in the facility, staff are professional when conducting searches and they are all offered mental health services. Interviews with inmates resulted in the following unsolicited positive comments.

- They make sure we know about PREA
- This is a good place
- I was assaulted at the last facility I was at and they made sure it was reported
- If they hear the shower they do not come in
- All staff are very respectable during searches; they tell us every step of the way while searching us
- This place is very good about not making us feel shame
- Mental health here is phenomenal
- This place is an anomaly
- Staff members all treat us as human beings
- The culture here is embraced we each other and staff based off of kindness and decency
- They let me do a peer group here - this place is a model for corrections
- This place is the best experience of my life. I wished every jail was exactly like this one.
 - o A very unique place - I've been in many jails, and this place is amazing. I receive individual therapy about my past victimization - first time I've been able to talk about my trauma - searches are trauma informed.

- o I've been fighting victimization since I was 10 and now here, after several programs, only here did I get help.
- o Very respectful staff, very unique. Incredible what this place and Jefferson Center of Mental Health has done for us. They do an outstanding job.
- o We can write on our tablet and all the programs we talk to write us back within an hour and a staff is here to talk to us.
- o I was suicidal when I got here, and this place saved my life.
- o This is a model jail.

Interviews with facility staff resulted in the following unsolicited positive comments.

- We have an open-door policy for reporting anything and outlets for reporting to external entities
- We treat them the way we want to be treated
- We never force anything on them - we bring up we've been notified and ask if they want to participate and provide a safe confidential space
- We would see any victim and or perpetrator within 24 hours
- We let the victim know waiting for evidence collection is their choice but is best for their wellbeing if we can gather evidence.
- We are part of a four-county wide SART Team. We facilitate with all language and ADA barriers.
- We do annual criminal background checks for staff, contractors and volunteers.
- We give them the choice to go to protective custody, where they will still receive all of their privileges, or go to general population
- Only supervisors can see PREA grievances
- The moment I know females are in the shower I don't go in the Block.
- Mental health contractors come two the three times per week
- They report to us so we need to be a resource for them
- We respect the fact that everyone is different
- We have them identify their gender before the search takes place

Site Observation:

During the tour of the facility, Sexual Assault brochures, in English and Spanish, and PREA audit notices were observed in inmate Blocks, in the lobby of the facility. Speed dial numbers to local advocates and a PREA hotline were painted on walls of each Block and Federal Marshal hotline posters were in the halls of the jail area.

(a) The Clear Creek County Jail PAQ states the agency Safe Prisons/PREA Plan mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract. The PAQ states, "Our policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment in Section 902.1.1 - Definitions and Procedure on Pages 1-2 of the document. This section clearly outlines the types of conduct that constitute sexual abuse, harassment, and misconduct by staff, contractors, volunteers, and inmates."

Policy 902, Prison Rape Elimination Act, page 1, section 902.1 Purpose and Scope states, "The Clear Creek County Sheriff's Office has a zero-tolerance policy against all forms of sexual abuse and sexual harassment. CCSO prohibits all sexual activity between or with any inmate(s) under our care and supervision. No staff may work at the facility before completing PREA training. Personnel are exempt from completing prior PREA training when responding to an emergency."

(b) The Clear Creek County Jail PAQ states the agency employs or designates an upper-level, agency-wide PREA Coordinator. The position of PREA Coordinator in the agency's organizational structure is the Detentions Captain / PREA Coordinator. The PAQ states, "Our policy designates the Detentions Captain as the PREA Coordinator, ensuring they have sufficient time and authority to develop, implement, and oversee agency efforts to comply with PREA standards."

The facility provided a Clear Creek County Citizens Organizational Chart demonstrating the Detentions Captain reports directly to the Undersheriff.

(c) The Clear Creek County Jail PAQ states the facility does not designate a PREA Compliance Manager as the facility is a standalone facility.

Through such reviews, the facility meets the standard requirements.

	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detentions Captain / PREA Coordinator <p>(a-b) The Clear Creek County Jail PAQ states the agency does not contract with a private agency for confinement services of their inmates.</p> <p>Through such reviews, the facility meets the standard requirements.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Clear Creek County Sherrif's Office, dated 2025 4. Clear Creek County Sheriff's Office Detention Facility Staffing Plan, dated 4.17.2025 5. Unannounced Checks Log, dated 5.31.2016 6. Post Audit: Safety Checks By Cell With Stats, dated 5.23.2025 through 6.1.2025 7. Post Audit: Clear Creek County Sherrif Office Memorandum, dated 6.2.2025 <p>Interviews:</p>

1. Detentions Lieutenant

The interview with the Detentions Lieutenant demonstrated Sergeants and on call personnel to include himself and the Detentions Captain complete unannounced checks during day shifts by documenting those unannounced in areas where inmates have access in the jail in the facility's jail management system.

Site Observation:

During the tour unannounced rounds were reviewed in the jail management system and observed to have been completed during day shift hours by Sergeants by documenting those unannounced rounds as 'Security Checks'. During the tour of the Boulder Block a blind spot was observed near the shower area and a recommendation was requested to add a mirror to ensure a potential victim is not in an area with a potential aggressor.

Corrective Action Plan:

- Facility to provide unannounced round documentation for 30 days to ensure rounds are conducted in all areas of the jail on both day and night shifts.
- Appropriate facility personnel to provide a memorandum with a sustainable action plan stating which facility position will ensure all requirements of §115.13 are met and sustained. Memorandum to be addressed to the DOJ PREA Auditor, date and author of the memorandum and standard in question.
- Upload requested documentation to the corresponding provision in the OAS.

Recommendation:

- Place mirror near shower in Boulder Dorm in order to see in the area right of the shower.

Post audit the facility provided a Safety Checks By Cell With Stats spreadsheet demonstrating the following is documented for unannounced rounds.

- Round observation times by minutes, number of observations, percentage
- Officer breakdown, Officer, count, percentage
- Observed at date and time; observed by; note; Alias Cell; Interval; Inmate count; time since last observation; late by

Post audit the facility provided a memorandum from the PREA Coordinator addressed to the DOJ PREA Auditor with the following sustainable action plan. “§115.13 - Unannounced rounds: As previously detailed in the memorandum dated June 2, 2025, the Shift Supervisor for each shift will ensure the consistent implementation and documentation of unannounced supervisory rounds. As the PREA Coordinator for the Clear Creek County Jail, I will oversee the implementation and ongoing adherence to these sustainable action plans. I will ensure that the assigned personnel are equipped with the necessary resources and training to fulfill their responsibilities effectively. We are committed to addressing the findings of the audit and maintaining full compliance with all PREA standards.”

(a) The Clear Creek County Jail PAQ states the agency requires the facility to develop, document and make its best efforts 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 abuse. Since August 20, 2012, or the last PREA audit, whichever is later, the average daily number of inmates is 58. The average daily number of inmates on which the staffing plan was predicted is 58. The PAQ states, “This is the ADP from March 1, 2018 to March 1, 2025. Due to limitations with our JMS, I am unable to go any farther back.”

Policy 902, Prison Rape Elimination Act, page 3, section 902.3 Supervision and Monitoring Policy states, “CCSO will protect inmates against sexual abuse and sexual harassment by limiting the possibility that inmates and staff will be left alone and unmonitored through adequate and ongoing supervision. CCSO will ensure that the facility shall develop, document, and make its best efforts 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 PREA Coordinator, along with the Facility Administration, will conduct an annual assessment to determine if staffing patterns, video monitoring systems, other technologies and resources are adequate to ensure the protection of inmates against sexual abuse and sexual harassment by limiting the possibility that inmates and staff will be left alone and unmonitored through adequate and ongoing supervision.”

(b) The Clear Creek County Jail PAQ states each time the staffing plan is not complied with, the facility documents and justifies deviations.

(c) The Clear Creek County Jail PAQ states at least once every year the facility/ agency, in collaboration with the PREA coordinator, reviews the staffing plan to whether adjustments are needed in (a) the staffing, (b) the deployment of monitoring

technology, or (c) the allocation of agency/facility resources to commit to the staffing plan to ensure compliance with the staffing plan. The facility completes a staffing plan annually to ensure continued compliance and provided a Detention Facility Staffing Plan for 2025

The facility provided a Clear Creek County Sheriff's Office Detention Facility Staffing Plan documenting the following information.

- Current Staffing Levels
- Minimum Staffing Requirements
- PREA Compliance Considerations to include:
 - o Video monitoring coverage
 - Supervisory rounds
 - Adjusting staffing
 - Any findings of inadequacy from internal or external oversight bodies
 - All components of the program's physical plant (including "blind spots" or areas where staff or residents may be isolated):
 - The composition of the resident population
 - The number and placement of supervisory staff
 - Programs occurring on shift
 - Any applicable State or local laws, regulations or standards.
 - The prevalence of substantiated and unsubstantiated incidents of sexual abuse
 - Any other relevant factors

The staffing plan is signed by the PREA Coordinator on 4.17.2025

(d) The Clear Creek County Jail PAQ states the facility requires that intermediate level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment.

Policy 902, Prison Rape Elimination Act, page 4, section 902.3 Supervision and Monitoring Policy states, "CCSO has 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. Such policy

and practice shall be implemented for night shifts as well as day shifts. CCSO will have a policy to prohibit 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.”

The facility provided an Unannounced Checks spreadsheet documenting the following.

- Name/Number
- Date
- Time
- Shift
- Staff

During the pre-audit phase the facility agreed unannounced rounds were not completed monthly and have put a system in place to complete rounds monthly.

Through such reviews, the facility meets the standard requirements.

115.14 Youthful inmates	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Clear Creek County Jail PAQ Interviews: 1. Detentions Captain / PREA Coordinator Interviews with the PREA Coordinator demonstrated youthful inmates are not housed at this facility. Site Observation: The facility tour, formal and informal interviews with the PREA Coordinator

	<p>demonstrated youthful inmates were not housed at the facility.</p> <p>(a) The Clear Creek County Jail PAQ states the facility does not house youthful inmates.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. National PREA Resource Center Guidance in Cross-Gender and Transgender Pat Searches, dated 2.2015 4. Training Session Sign-Off Sheet - Topic: Guidance on Cross-Gender and Transgender Pat Searches, dated 6.14.2024 - 7.1.2024 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Inmates 2. Targeted Inmates 3. Deputy Sheriffs 4. Detentions Captain / PREA Coordinator <p>Interviews with 10 inmates demonstrated cross gender announcements are always made by opposite gender Deputy’s. Inmates of both genders stated the opposite gender Deputy will not come into the Block if they hear the shower running. Inmates were questioned as to where they were expected to change clothes and each stated behind the shower curtain. When inmates were asked if staff members conducted searches professionally, each stated yes and multiple inmates stated searches were ‘trauma informed’ and staff would tell them every step of the way as the search was completed.</p>

Interviews with male and female Deputy Sheriffs demonstrated each had been trained in cross gender search protocols. Male and female Deputy Sheriffs demonstrated that announcements are made every time they enter an opposite gender Block.

Site Observation:

During the tour the search area was observed to be in a single cell/holding area, with a full door, where one staff member will stand on the outside of the door and instruct the inmate on each search step throughout the search. The search room is out of line of sight of the camera near the door as that camera was viewed in the security area to ensure visibility was out of line of sight.

The facility is comprised of one small dorm and three Blocks, three of the housing units are for males and one for female inmates. The dorm is equipped with a full bathroom which provides privacy for changing, showering and toileting with full curtains on each shower. Each Block is equipped with shower curtains and private areas for toileting.

(a) Clear Creek County Jail PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their Inmates. In the past 12 months zero cross-gender strip or cross-gender visual body cavity searches of inmates.

Policy 902, Prison Rape Elimination Act, page 4, section 902.4 Limits to Cross Gender Searches and Viewing states, "CCSO prohibits cross-gender strip, except in exigent circumstances. If required, the cross-gender strip search will be conducted by a trained staff member with a same gender witness in the room. CCSO prohibits staff of the opposite gender to view inmates showering, changing clothes, or performing bodily functions except when such view is incidental during routine cell (bed) checks."

(b) Clear Creek County Jail PAQ states the facility does not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. The facility does not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision. The number of pat-down searches of female inmates that were conducted by male staff were 61 from January 1.2023 through March 17.2023. The PAQ states, "Yes, our facility does not restrict female inmates' access to regularly available programming or other out-of-cell

opportunities in order to comply with PREA provisions regarding cross-gender searches.”

(c) Clear Creek County Jail PAQ states the facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified.

Policy 902, Prison Rape Elimination Act, page 4-5, section 902.4 Limits to Cross Gender Searches and Viewing Procedure states, “If required in exigent circumstances, when a cross-gender strip search is conducted, it will be done by a trained staff member, with a same gender witness. It will be conducted in a private setting and documented. Documents on cross gender pat search log, and all other jail logs, will not be adjusted at any time. Only a licensed physician or nurse under sanitary conditions may conduct a physical body cavity search. Except in exigent circumstances, only a physician who is not responsible for providing ongoing care to the inmate should conduct the search.”

(d) Clear Creek County Jail PAQ states the facility has implemented policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit.

Policy 902, Prison Rape Elimination Act, page 5, section 902.4 Limits to Cross Gender Searches and Viewing Procedure states, “When staff are entering opposite sex housing units, they will announce their presence each time they enter the unit.”

(e) The Clear Creek County Jail PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex inmate for the sole purpose of determining the inmate’s genital status. Such searches have not occurred in the past 12 months.

Policy 902, Prison Rape Elimination Act, page 5, section 902.4 Limits to Cross Gender Searches and Viewing Policy states, “CCSO shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmates' genital status. If an inmate's genital status is unknown, it may be determined during

conversation 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.”

(f) The Clear Creek County Jail PAQ states 100% of security staff have received training on conducting cross-gender pat-down searches and searches of transgender and intersex Inmates in a professional and respectful manner consistent with security needs.

Policy 902, Prison Rape Elimination Act, page 5, section 902.4 Limits to Cross Gender Searches and Viewing Procedure states, “CCSO will train staff on cross gender pat-down searches and searches of transgender and intersex inmates, in a professional and respectful manner, during the PREA training and document completion. Staff will be required to watch the Cross-Gender and Transgender Pat Searches Video from the PREA Resource Center.

All new employees will complete Body Searches and Body Scanning training during orientation in compliance with CCSO policy. All searches shall be done in a manner that avoids unnecessary force, embarrassment, or indignity to the inmate. Staff are not permitted to complete searches until they have completed the training.”

The facility provided a National PREA Resource Center Guidance in Cross-Gender and Transgender Pat Searches Training Curriculum. The goals for this training are:

1. Learn the relevant PREA Standards for cross-gender pat searches and for transgender and intersex pat searches;
2. Understand and apply the definition of exigent circumstances;
3. Learn and understand key terms relevant to conducting appropriate searches and to considerations for searches of transgender or intersex inmates and residents;
4. Practice the steps of cross-gender pat searches and transgender or intersex pat searches.

The facility provided a Training Session Sign-Off Sheet – Topic: Guidance on Cross-Gender and Transgender Pat Searches documenting the following.

- Training components
- Participant Information for 16 employees

	<ul style="list-style-type: none"> o Name o Position/Title o Signature o Date <p>Through such reviews, the facility meets the standard requirements.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. ADA Test for NTouch Software 4. Language Line Services Inc., Master Service Agreement, dated 8.14.2023 5. Post Audit: Five Zero Tolerance Acknowledgments for Spanish Speaking Inmates, dated 5.29.2025 6. Post Audit: Clear Creek Sherrif’s Office Memorandum, dated 6.2.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Targeted Inmates 2. Sergeant 3. Undersheriff <p>Interviews with targeted inmates included three cognitive and one LEP inmates. Each of the three cognitive inmates were able to articulate their awareness of the facility zero tolerance mission, reporting requirements and their rights to include the grievance procedures. The LEP inmate was unaware of the PREA and the facility zero tolerance policy, reporting options and his rights.</p>

The interview with the Sergeant demonstrated during the booking process inmates are educated on zero tolerance to include their rights and reporting information by having the brochure and acknowledgment read to them and asking inmates if they understand the information they have received. In addition, each inmate views the PREA video before they are placed in a Block. The Sergeant stated visuals and interpreter services are provided for cognitively delayed, LEP or ADA inmates as each Deputy has access to language line services.

The interview with the Undersheriff demonstrated the facility has made many changes for inmates with disabilities by adding language line services, ADA training with facility personnel, abilities for impaired services, providing mental health services with Jefferson County Mental Health and Community Based Mental Health services.

Site Observation:

During the tour of the facility, standardized postings to include Sexual Assault brochures in English and Spanish, Hotline speed dial numbers to the facility hotline and community hotlines and Federal Marshall Service hotline.

Corrective Action Plan:

- Facility to provide documented education of LEP inmates in a language in which they understood.
- Appropriate facility personnel to provide a memorandum with a sustainable action plan stating which facility position will ensure all requirements of §115.16 are met and sustained. Memorandum to be addressed to the DOJ PREA Auditor, date and author of the memorandum and standard in question.
- Upload requested documentation to the corresponding provision in the OAS

Post audit the facility provided five Zero Tolerance Acknowledgments for Spanish speaking inmates demonstrating each received PREA education in their first language.

Post audit the facility provided a memorandum from the PREA Coordinator addressed to the DOJ PREA Auditor with the following sustainable action plan. "§115.16 - Meaningful access for limited English proficient inmates: The Shift Supervisors, in

collaboration with the Detentions Deputies, will be responsible for ensuring that LEP inmates receive meaningful access to all aspects of the agency's PREA efforts, including the provision of education and access to reporting mechanisms in a language they understand. As the PREA Coordinator for the Clear Creek County Jail, I will oversee the implementation and ongoing adherence to these sustainable action plans. I will ensure that the assigned personnel are equipped with the necessary resources and training to fulfill their responsibilities effectively. We are committed to addressing the findings of the audit and maintaining full compliance with all PREA standards."

(a) The Clear Creek County Jail PAQ states the agency has established procedures to provide disabled Inmates equal opportunities to be provided with and learn about the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment. The PAQ states, "Yes, our facility has established procedures to ensure that disabled inmates have equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment."

Policy 902, Prison Rape Elimination Act, page 5, section 902.5 Inmates with Disabilities and Who are Limited English Proficient Policy states, "CCSO will take appropriate steps to ensure that inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the program's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. When necessary to ensure effective communication with inmates who are deaf or hard of hearing, the program will provide access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, CCSO will ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. Note: A program is not required to take actions that can demonstrate 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 II of the Americans with Disabilities Act, 28 CFR 35.164.

CCSO will take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. CCSO will not rely on inmate interpreters, inmate readers, or other types of inmate assistants

except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first response duties or the investigation of the inmate's allegations.”

The facility provided an ADA Test which is used to access a qualified interpreter via a VRI service in NTouch software allowing inmates to communicate with anyone outside of the facility that has phone number.

The facility provided a Language Line Services Master Service Agreement speaking to 240 languages being available 24 hours a day, seven days per week. The agreement appears to be current and does not stipulate and expiration date.

(b) The Clear Creek County Jail PAQ states the agency has established procedures to provide inmates with limited English 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.

Policy 902, Prison Rape Elimination Act, page 5-6, section 902.5 Inmates with Disabilities and Who are Limited English Proficient Procedure states, “CCSO will ensure that inmates with disabilities and inmates who are limited English proficient have equal access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

CCSO contracts with a language line for translation services to inmates who are not English proficient and for American Sign Language Translation.

The inmate education video, PREA: What You Need to Know will have closed captioning options for deaf inmates.

Zero Tolerance posters or materials will be displayed in inmate housing units and in the intake center of the CCSO Detentions center.

CCSO will not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-

responder duties, or the investigation of the inmate's allegations. If an inmate is unable to read then a CCSO detentions deputy will read them the PREA Inmate brochure.

CCSO will evaluate and document disabilities on intake via the Internal Housing Risk Factor Form. When a disability is identified staff will notify the PREA Compliance Coordinator to ensure the correct accommodation for education of inmate's rights to be free from sexual abuse and/or sexual harassment are communicated in an appropriate manner. The PREA Coordinator will document efforts to include the inmate's needs and what accommodations were provided regarding inmate PREA education.”

(b) The Clear Creek County Jail PAQ states the agency prohibits the use of inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations. In the last 12 months the facility has used an interpreter 190 times in the last 12 months and zero instances where inmates were used for interpreters. Policy compliance can be found in provision (c) of this standard.

Through such reviews, the facility meets the standard requirements.

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: <ol style="list-style-type: none">1. Clear Creek County Jail PAQ2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.20253. Clear Creek County Jail Hiring and Promotion Questionnaire, not dated Interviews: <ol style="list-style-type: none">1. Detentions Lieutenant

2. Detentions Captain

The interview with the Detentions Lieutenant demonstrated that all applicants, contractors and volunteers complete a criminal background check initially and every year thereafter. Administrative adjudication questions are completed before having access to inmates. Employees in the promotion process will complete an additional background check and adjudication questions during the promotion process. Applicants who have been involved in a sexual harassment allegation are considered for employment; however, those who have been involved in substantiated cases are automatically disqualified for employment. The Detentions Lieutenant stated each employee is aware he or she must report any citations with law enforcement within 24 hours of the incident. The Detentions Lieutenant stated he completes all incoming and outgoing institutional reference checks once a waiver for a release of information release is received from the present or past employee.

An interview between the Detentions Captain and the DOJ PREA Auditor took place discussing the reasons behind not requiring a release of information unless County or State law prohibits this practice due to ensuring the Clear Creek County Sheriff's Office does not hire applicants who could have been involved in past sexual harassment or sexual abuse incidents.

Site Observation:

Utilization of the PREA Audit Adult Prison & Jail Documentation Review Employee File/ Records template demonstrated 14 of 14 employee, one contractor and two volunteer files reviewed had background checks upon hire and every year, thereafter. The facility was able to demonstrate administrative adjudication questions were asked during the hiring and promotion processes and institutional reference checks are requested and completed for applicable applicants and contractors.

(a) The Clear Creek County Jail PAQ states the agency policy prohibits hiring or promoting anyone who may have contact with inmates and prohibits enlisting the services of any contractor who may have contact with inmates who: (1) 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); (2) 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 (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

Policy 902, Prison Rape Elimination Act, page 6, section 902.6 Hiring Requirements

and Promotion Decisions Policy, states, "CCSO shall attempt to prevent staff sexual misconduct by ensuring that individuals who have a prior history of being sexually abusive are not hired or contracted into positions where they may have contact with inmates.

CCSO will not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who:

1. 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);
2. 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;
3. Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a) (2) of this section."

The facility provided a Clear Creek County Jail Hiring and Promotion Questionnaire documenting the following information.

Section 1: History of Misconduct Related to Sexual Abuse

1. Have you ever engaged in any form of sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution?
2. Have you ever been convicted of engaging or attempting to engage in sexual activity involving any of the following circumstances?
3. Have you ever been civilly or administratively adjudicated for engaging in any of the behaviors described in question 2?

Section 2: History of Sexual Harassment

4. Have there been any substantiated incidents of sexual harassment in your professional history?

Section 3: Employment and Background Verification

5. Have you ever resigned from a position while under investigation for allegations of sexual abuse?

6. Do you have any criminal convictions or open investigations related to sexual misconduct?

Section 4: Continuing Affirmative Duty and Disclosure

7. Do you understand that you have a continuing duty to disclose any future incidents of misconduct as described above?

8. Do you understand that you are required to fully disclose any relevant misconduct, and that any material omission or false information may lead to termination?

Section 5: For Promotional Candidates Only

9. Have there been any new incidents or allegations since your last review regarding any type of sexual misconduct or harassment, either substantiated or under investigation?

10. Do you understand that ongoing eligibility for promotion requires adherence to our standards regarding conduct and disclosure?

(b) The Clear Creek County Jail PAQ states agency policy requires the consideration of any incidents of sexual harassment when determining to hire and or promote anyone, or to enlist services of any contractor, who may have contact with inmates.

Policy 902, Prison Rape Elimination Act, page 6, section 902.6 Hiring Requirements and Promotion Decisions Policy, states, "CCSO will consider 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."

(c) The Clear Creek County Jail PAQ states agency policy requires that before it hires any new employees who may have contact with inmates, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes 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. In the past 12 months, the number of people hired who may have contact with inmates who have had criminal background record checks was 10.

Policy 902, Prison Rape Elimination Act, page 7, section 902.6 Hiring Requirements and Promotion Decisions Policy, states, "Before hiring new employees, who may have contact with inmates, the CCSO will:

1. Perform a criminal background record check;
2. 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.
3. CCSO will also perform a criminal background records check, before enlisting the services of any contractor who may have contact with inmates.
4. CCSO will conduct criminal background records checks at least every year upon hire date of current employees and contractors who may have contact with inmate or have in place a system for otherwise capturing such information for current employees.
5. CCSO will also 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 and in any interviews or written self-evaluations conducted as part of reviews of current employees. The CCSO will also impose upon employees a continuing affirmative duty to disclose any such misconduct.
6. Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.
7. Unless prohibited by law, CCSO 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

Policy 902, Prison Rape Elimination Act, page 7, section 902.6 Hiring Requirements and Promotion Decisions Procedure states, "CCSO will complete a thorough background check on all new employees prior to hire. The background will include the Disclosure of PREA Employment Standards Violation form which is a self-disclosure for prior misconduct 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. CCSO will perform a criminal background check for new hires, promotions, and every five years on current employees. CCSO will make its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. CCSO will provide information of 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.”

(d) The Clear Creek County Jail PAQ states the agency policy requires that a criminal background records check be completed before enlisting the services of any contractor who may have contact with inmates. In the past 12 months there were seven contracts for services where criminal background record checks needed to be conducted. The PAQ states, “Yes, our agency requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with inmates.” Policy compliance can be found in provision (c) of this standard.

During the preaudit phase the Auditor requested information on the agency system for five-year background checks. The facility PREA Coordinator stated, “Backgrounds are conducted yearly for all Sheriff’s Office staff (civilian, certified, and non-certified). These are conducted every January of each year and submitted by January 31st. This process includes background checks through CCIC and NCIC (for wants/warrants) as well as criminal history and driving status.”

(e) The Clear Creek County Jail PAQ states the agency requires background checks to be completed every five years. Backgrounds are conducted yearly for all Sheriff’s Office staff (civilian, certified, and non-certified). These are conducted every January of each year and submitted by January 31st. This process includes background checks through CCIC and NCIC (for wants/warrants) as well as criminal history and driving status. Policy compliance can be found in provision (c) of this standard.

(g) The Clear Creek County Jail PAQ states that agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Policy compliance can be found in provision (c) of this standard.

Through such reviews of the facility completing annual criminal records checks annually for all facility personnel, contractors and volunteers, the facility exceeds the standard requirements.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Clear Creek County Jail PAQ
2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025

Interviews:

1. Undersheriff

The interview with the facility Undersheriff demonstrated that the facility has not made any substantial modifications or added additional cameras in the recent past. The Undersheriff stated the agency uses technology by making all policies digital, each staff member has access to iPhone for round documentation, security intercoms and tablets for inmates.

Site Observation:

Cameras were reviewed in the security area in the booking area. Cameras reviewed included the kitchen, jail hallways, dorm and blocks, medical and the perimeter of the building. All cameras appeared to be working, and the Sergeant stated cameras are fixed within 24 hours as the vender prioritizes to ensure cameras are always maintained.

(a) The Clear Creek County Jail PAQ states the facility has acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.

Policy 902, Prison Rape Elimination Act, page 7, section 902.7 Upgrades to Facility and Technology Policy states, "CCSO will take sexual safety into consideration when making decisions about upgrades to the facility's physical plant and video monitoring technologies, the acquisition of new facilities, and during the process of designing any new facility or expansion of an existing facility. Decisions will be documented."

(b) The Clear Creek County Jail PAQ states the facility has installed new cameras since the last PREA audit.

Through such reviews, the facility meets the standard requirements.

115.21	Evidence protocol and forensic medical examinations
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 297">Auditor Discussion</p> <p data-bbox="256 340 523 374">Document Review:</p> <ol data-bbox="256 412 1469 629" style="list-style-type: none"> <li data-bbox="256 412 711 445">1. Clear Creek County Jail PAQ <li data-bbox="256 483 1469 557">2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <li data-bbox="256 595 1182 629">3. Memorandum of Understanding PeaceWorks, dated 4.8.2025 <p data-bbox="256 741 416 775">Interviews:</p> <ol data-bbox="256 813 820 918" style="list-style-type: none"> <li data-bbox="256 813 564 846">1. Registered Nurse <li data-bbox="256 884 820 918">2. JBBS Clinical Therapist - Contractor <p data-bbox="256 956 1469 1115">The interview with the Registered Nurse and the Clinical Therapist demonstrated that the medical department is aware of signs and symptoms of sexual abuse, and each will immediately report allegations to the Sergeant or their immediate supervisor and will send inmates to the Common Spirit St. Anthony Hospital for forensic exams.</p> <p data-bbox="256 1227 1469 1509">(a) The Clear Creek County Jail PAQ states the facility is responsible for conducting administrative sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct). If another agency has responsibility for conducting either administrative or criminal sexual abuse investigations, the name of the agency that has responsibility is the Avery County Sheriff's Department. The PAQ states, "Yes, our agency is responsible for conducting administrative sexual abuse investigations, including inmate-on-inmate sexual abuse and staff sexual misconduct."</p> <p data-bbox="256 1621 1469 1816">Policy 902, Prison Rape Elimination Act, page 25-26, section 902.27 Criminal and Administrative Agency Investigations Policy states, "CCSO will ensure that all allegations of sexual abuse and sexual harassment are investigated thoroughly and properly so that incidents are substantiated when they should be, both to deter these incidents and to increase reporting.</p> <ol data-bbox="256 1861 1461 2089" style="list-style-type: none"> <li data-bbox="256 1861 1461 1977">1. When CCSO conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. <li data-bbox="256 2016 1461 2089">2. Where sexual abuse is alleged, CCSO shall use investigators who have received special training in sexual abuse investigations.

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

4. When the quality of evidence appears to support criminal prosecution, CCSO shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

5. The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. CCSO will not require 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:

1. Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and

2. Shall 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:

1. Shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attach copies of all documentary evidence where feasible.

2. Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.

3. The CCSO shall retain all written reports for as long as the alleged abuser is incarcerated or employed by CCSO, plus five years.

4. The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.

5. Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements.

6. When outside agencies investigate sexual abuse, CCSO shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

PROCEDURE

Investigations of sexual abuse will be referred to The Clear Creek County Sheriff's Office. Deputies who respond for investigation will have completed special training in sexual abuse investigations."

(b) The Clear Creek County Jail PAQ states The protocol was adapted from or otherwise based on the most recent edition of the DOJ'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.

(c) The Clear Creek County Jail PAQ states the facility offers all inmates who experience sexual abuse access to forensic medical examinations. Forensic examinations are offered at no cost to the victim. Where possible, all examinations are conducted by SAFE or SANE examiners. The number of forensic exams conducted during the past 12 months was zero. The facility takes sexual assault victims to Common Spirit St. Anthony Hospital at 11600 West 2nd Place, Lakewood, CO 80228.

(d) The Clear Creek County Jail PAQ states the facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. All efforts are documented. If a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff or community member.

The facility provided a Memorandum of Understanding for Cooperative Relations between Clear Creek County Sheriff's Office and PeaceWorks, Inc. The memorandum appears to be current and does not have an expiration date. The memorandum is signed by the Clear Creek County Sheriff the PeaceWorks Executive Director and the PeaceWorks Board Chair.

(e) The Clear Creek County Jail PAQ states a qualified staff or community member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information and referrals.

(f, g, h) The Clear Creek County Jail PAQ states the agency is responsible for

	<p>investigating administrative or criminal allegations of sexual abuse and relies on another agency to conduct these investigations, the agency has requested that the responsible agency follow the requirements of paragraphs §115.21 (a) through (e) of the standards.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detective / Investigator 2. Undersheriff <p>The interview with the investigator demonstrated each allegation of sexual harassment or sexual abuse are taken seriously and investigated regardless of the source of the allegation.</p> <p>The interview with the Undersheriff demonstrated all allegations are investigated and if the facility cannot handle the investigation internally the Policy Analyst or an external entity is contacted.</p> <p>Site Observation:</p> <p>The facility has had two sexual harassment allegations, each investigated timely, within the past 12 months. Both allegations were reported verbally by the victim.</p>

(a) The Clear Creek County Jail PAQ states the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including inmate-on-inmate sexual abuse and staff sexual misconduct). In the past 12 months the facility has had two allegations of sexual harassment that were received.

Policy 902, Prison Rape Elimination Act, page 9, section 902.9 Ensuring referrals or Allegations for Investigations Policy states,

1. “CCSO will ensure that an administrative investigation is completed for all allegations of sexual abuse and sexual harassment.
2. CCSO will ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.
3. CCSO will have in place a policy 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. CCSO will publish such policy on its website. CCSO will document all referrals.
4. If a separate agency is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity.
5. Any State entity responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons and jails shall have in place a policy governing the conduct of such investigations.
6. Any Department of Justice component responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons or jails shall have in place a policy governing the conduct of such investigations.

PROCEDURE

CCSO will ensure that all reports of sexual abuse and sexual harassment are investigated. The determination of whether an allegation involves potentially criminal behavior will be made by the PREA Compliance Coordinator.”

During the pre-audit phase, the following conversation took place between the PREA Auditor and the PREA Coordinator. The PAQ and sections of agency policy demonstrate you all investigate both sexual abuse and sexual harassment investigations; however, 902.9 states both types of investigations are referred out. Can you clarify and or adjust the policy language? We have the criminal jurisdiction to investigate staff members. That being said, the Sheriff or designee (most likely the

	<p>detentions division captain) may decide to include an investigator from an outside agency for transparency reasons if the suspect in the case is a CCSO staff member. Therefore, we do not feel it would be necessary to change policy section 902.9.</p> <p>(b-c) The Clear Creek County Jail PAQ states the agency has policy that requires allegations of sexual abuse or harassment to be referred for investigation to an agency with the legal authority to conduct criminal investigations. Policy compliance can be found in provision (a) of this standard.</p> <p>(d) The Clear Creek County Jail PAQ states the agency is responsible for conducting administrative or criminal investigations of alleged sexual abuse, and another state entity has that responsibility, this other entity has a policy governing how such investigations are conducted is not applicable. Policy compliance can be found in provision (a) of this standard.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Lexipol PoliceOne Academy - Course Title: Prison Rape Elimination Act (PREA) Overview, not dated 4. Sheriff's Office Staff PREA Guide PREA Acknowledgment, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Deputy Sheriffs <p>Interviews with Deputy Sheriffs demonstrated each has received documented education on the agency zero tolerance policy through the Police and Corrections 1</p>

and Police1.com online classes.

Site Observation:

Utilization of the PREA Audit Adult Prison & Jail Documentation Review Employee File / Records Review template demonstrated 17 of 17 employees interviewed had completed annual training regarding the agency zero tolerance policy. Refresher trainings have not yet been completed as this is the first year of PREA compliance for the facility.

(a) The Clear Creek County Jail PAQ states the agency trains all employees who may have contact with Inmates in all required provisions of this standard.

Policy 902, Prison Rape Elimination Act, page 10, section 902.10.1 Training and Education states, "To ensure that staff can prevent, detect, and respond to sexual abuse and sexual harassment and to create a culture of sexual safety in the facility, all employees who may have contact with inmates shall be trained on:

1. The 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; How to avoid inappropriate relationships with inmates;
8. How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
9. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

PROCEDURE

CCSO will provide PREA training to all new employees within 6 weeks of hire and prior

to any contact with inmates. Employees will be required to provide a signature or electronic verification that staff understand the training they have received. Documentation will be kept in employee files.

All CCSO employees will receive an annual refresher training to ensure that staff can prevent, detect, and respond to sexual abuse and sexual harassment and to create a culture of sexual safety in the facility.”

The facility provided a Lexipol PoliceOne Academy – Course Title: Prison Rape Elimination Act (PREA) Overview with the following synopsis.

Objective 1: Providing an understanding of the history of the problem of sexual abuse in confinement helps establish the importance of PREA’s goal to eliminate sexual abuse and harassment in confinement.

Objective 2: Identifying PREA standards will help create a sense of awareness and accountability for the learner to gain the knowledge base needed to be effective in their role.

Objective 3: Making the connection between the PREA standards and how they directly correlate with the learner’s role and responsibilities will help reinforce an understanding of what they’ve learned.

Objective 4: The goal of the audit is to practically assess a facility’s practices for PREA compliance while reinforcing the learner’s retention of the process.

Objective 5: Examining organizational culture allows the learner to consider their own organizations and how to best apply their knowledge to create a safer environment.

PREA: Rights, Reporting, and Retaliation for Prisons and Jails

Objective 1: Correctional officers are obligated to recall the definition of sexual abuse and sexual harassment as recognized by PREA to identify instances of these crimes. Once the injustice has been identified, correctional agencies will be able to apply the appropriate policy to ensure inmates and staff know their right to be free from a sexually abusive environment.

Objective 2: A prepared corrections officer will be able to list the main challenges and best practices for effective PREA implementation. Equipped with this knowledge, the corrections officer will be able to be proactive with procedure when faced with challenges and have a policy-compliant response at the ready.

Objective 3: Occurrences of retaliation are not always obvious. Observant corrections officers have the ability to recognize the characteristics of overt and

indirect retaliation, to assure no retaliatory actions go unnoticed and unreported.

Objective 4: Correctional facilities must recognize the effects of prison rape to avoid personal and community trauma and the degradation of the facility's integrity.

Objective 5: When retaliation transpires, a corrections officer must respond. After listing PREA requirements for assuring freedom from retaliation, the corrections officer will be able to react with PREA-compliant procedure to instances of retaliation.

(b) The Clear Creek County Jail PAQ states training is tailored to the unique needs and attributes and gender of Inmates at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training. The PAQ states, "Yes, the Clear Creek County Sheriff's Office (CCSO) ensures that training for staff is tailored to the gender of the inmates at the facility. CCSO provides specialized training on cross-gender pat-down searches and searches of transgender and intersex inmates."

(c) The Clear Creek County Jail PAQ states between trainings the agency provides employees who may have contact with inmates with refresher information about current policies regarding sexual abuse and sexual harassment. The facility will complete refresher training annually.

(d) The Clear Creek County Jail PAQ states the agency documents that employees who may have contact with inmates understand the training they have received through employee signature or electronic verification.

The facility provided a Sheriff's Office Staff PREA Guide PREA Acknowledgment form with the following components.

- Facility Zero Tolerance Policy
- What is Sexual Misconduct
- Maintaining Professional Boundaries
- The Consequences of Sexual Misconduct
- Red Flags of Inappropriate Behavior
- A Duty to Report
- Resources for Staff
- Important Reminders

	<p>· Acknowledgement: By signing below, I acknowledge that I have read, understand, and agree to comply with Clear Creek County Jail’s policies on preventing and reporting sexual misconduct with inmates. I understand the consequences of violating these policies and my responsibility to maintain professional boundaries at all times.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Sheriff’s Office Staff PREA Guide PREA Acknowledgment, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Volunteers (2) - Religious Services 2. Contractor - JBBS Clinical Therapist <p>The interview with volunteers demonstrated each were educated on the agency zero tolerance policy during their orientation, policy review and watching the PREA video. Both volunteers stated they were comfortable reporting any information regarding sexual harassment and sexual assault to any staff member. The interview with the contracted Clinical Therapist demonstrated she complete training on the agency zero tolerance policy through policy review and she also stated she would feel comfortable reporting any information to the Captain, Lieutenant or Deputy’s.</p> <p>Site Observation:</p> <p>Utilization of the PREA Audit Adult Prison & Jail Documentation Review Employee File / Records Review template demonstrated the contractor and volunteers had completed education on the agency sexual abuse and sexual harassment and reporting requirements.</p>

(a) The Clear Creek County Jail PAQ states all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and harassment prevention, detection, and response. The facility has seven volunteers, who have contact with inmates have completed the required training.

Policy 902, Prison Rape Elimination Act, page 10-11, section 902.10.2 Volunteer and Contractor Training Policy states, "All volunteers and contractors who have contact with inmates will be trained on their responsibilities under CCSO's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

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, but all volunteers and contractors who have contact with inmates shall be notified of the program's zero tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. CCSO will maintain documentation confirming that volunteers and contractors understand the training they have received.

PROCEDURE

CCSO will require all volunteers and contractors complete a "Read and Sign" explaining the facilities zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents. Documentation will be filed on site and volunteer and contractors will receive a copy of the PREA Guidelines Form, Volunteers, and Contractors to take with them. PREA Coordinator will be available to answer questions regarding the zero-tolerance policy."

(b) The Clear Creek County Jail PAQ states the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates. All volunteers and contractors who have contact with inmates have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

(c) The Clear Creek County Jail PAQ states the agency maintains documentation confirming that the volunteers and contractors understand the training they have received.

	<p>The facility provided the contractor and volunteers education, Sheriff's Office Staff PREA Guide which is the same PREA Acknowledgment as is described in §115.31.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.33	Inmate education
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Clear Creek County Jail Sheriff Rick Albers Inmate Sexual Assault Awareness Handout, not dated 4. Sexual Assault and Custodial Sexual Misconduct Brochure, dated 11.2005 5. Zero Tolerance for Sexual Abuse and Sexual Harassment Acknowledgment, not dated 6. Wall Posting of PREA Contact Information <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Inmates 2. Targeted Inmates 3. Sergeant <p>Interviews with five random and five targeted inmates were able to state they were educated on the agency zero tolerance policy, viewed a video and made aware they could report on the phone, tablet, talking with staff, their therapist, nurse, completing a kite or a grievance, a family member or friend.</p> <p>T The interview with the Sergeant demonstrated during the booking process inmates are educated on zero tolerance to include their rights and reporting information by having the brochure and acknowledgment read to them and asking inmates if they</p>

understand the information they have received. In addition, each inmate views the PREA video before they are placed in a Block.

Site Observation:

Utilization of the PREA Audit Adult Prison & Jail Documentation Review Inmate File / Records Review template demonstrated that seven of ten inmates interviewed have been admitted into the program in the past 12 months. Of those seven inmates, each had received PREA education within 72 hours of intake to include comprehensive education through viewing the PREA video.t

(a) The Clear Creek County Jail PAQ states inmates receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. The number of inmates admitted in the past 12 months who were given this information at intake was 481.

Policy 902, Prison Rape Elimination Act, page 11-12, section 902.10.3 Inmate Education Policy states, "CCSO shall provide inmates information on how to prevent sexual abuse and sexual harassment as well as encourage reporting through teaching inmates about their right to be free from sexual abuse and sexual harassment, educating them about the ways they can report it, and making sure they understand what will happen if there is an incident of sexual abuse or sexual harassment, including what services are available to victims. Inmate education can build their trust in staff and the facility's commitment to safety, which may increase reporting and ultimately deter sexual abuse and sexual harassment.

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

Within 30 days of intake, CCSO will provide comprehensive education to inmates either in person or through video, and each inmate will receive a PREA Brochure 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.

CCSO will provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills.

CCSO will maintain documentation of inmate participation in these education sessions.

In addition to providing such education, the program shall ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.

PROCEDURE

CCSO will provide inmates the Sexual Assault and Custodial Staff Sexual Misconduct brochure at intake which will explain the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. Within 30 days of intake, inmates will be required to watch the PREA video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents. During the intake process, staff will answer questions from inmates and review how to report sexual assault.

CCSO will ensure information is readily available or visible to inmates through posters, brochures, and the inmate handbook. Posters will be visible in each unit and the visiting area. Each inmate will also receive a digital copy of the inmate handbook which will provide reporting information.

There will be a Spanish version of the Inmate Handbook posted with the English version. The PREA video will be closed captioned and available in Spanish. If an inmate speaks a language other than English or Spanish, staff will utilize the Language Line for translation which will also offer American Sign Language translation as needed. For inmates who have limited reading skills, staff will review the brochure and reporting information 1:1 to ensure the inmate understands the information.”

The facility provided a Sexual Assault and Custodial Sexual Misconduct brochure with the following elements.

- Agency Zero Tolerance policy
- What is sexual assault
- Examples of sexual assault
- How to prevent sexual assault

- What to do if you've been sexually assaulted
- How to report sexual assault
- Reporting options

The facility provided a Clear Creek County Jail Sheriff Rick Albers Inmate Sexual Assault Awareness Handout with the following elements.

- What is Sexual Assault?
- What can I do to avoid a Sexual Assault?
- What can I do if I am Sexually Assaulted?
- What happens after I report a Sexual Assault?

(b) The Clear Creek County Jail PAQ states the number of those inmates admitted during the past 12 months (whose length of stay in the facility was for 30 days or more) who received comprehensive education on their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake. The PAQ states, "I do not have the ability to get the number of inmates who stayed in our custody 30 days or more. This is due to limitations with our JMS."

(c) The Clear Creek County Jail PAQ states of those who were not educated during 30 days of intake, all inmates will be subsequently educated. Agency policy requires that inmates who are transferred from one facility to another be educated regarding their rights to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents, to the extent that the policies and procedures of the new facility differ from those of the previous facility. The PAQ states, "All inmates receive PREA education before placed into general population." Policy compliance can be found in provision (a) of this standard.

(d) The Clear Creek County Jail PAQ states Inmate PREA education is available in accessible formats for all inmates including those who are limited English proficient, deaf, visually impaired, otherwise disabled or have limited reading skills. Policy compliance can be found in provision (a) of this standard. The PAQ states, "Yes, the Clear Creek County Sheriff's Office (CCSO) ensures that inmate PREA education is available in formats accessible to all inmates, including those who are otherwise disabled. CCSO provides accommodations for inmates with disabilities, including those who have hearing, vision, intellectual, psychiatric, or speech impairments, to

ensure they receive equal access to PREA education. CCSO contracts with a language line for translation services, including American Sign Language (ASL) interpretation for deaf inmates. Written materials are provided in accessible formats, and staff read educational materials to visually impaired inmates. If an inmate has limited reading skills, a detention deputy will provide one-on-one assistance to ensure comprehension. Additionally, CCSO evaluates and documents disabilities during intake via the Internal Housing Risk Factor Form, and the PREA Compliance Coordinator ensures appropriate accommodations for education are provided and documented.”

(e) The Clear Creek County Jail PAQ states the facility maintains documentation of inmate participation in PREA education sessions.

The facility provided a Zero Tolerance for Sexual Abuse and Sexual Harassment Acknowledgment with the following elements.

- Inmate Name
- Booking Number
- Completed By
- Right to Report
- How to Report
- False Report
- Victim Services
- By signing this form, I acknowledge that I understand the PREA “Zero Tolerance” Policy while incarcerated at the Clear Creek County Jail and received a copy of the “Inmate Sexual Assault Awareness” form.
- *Refer to the Clear Creek County Jail Inmate Handbook for more information on anonymous reporting and limits to confidentiality for emotional support services.

(f) The Clear Creek County Jail PAQ states the agency ensures that key information about the agency’s PREA policies is continuously and readily available or visible through posters, inmate handbooks, or other written formats. Procedure compliance can be found in provision (a) of this standard.

The facility provided a photo of the following spray painted on a facility wall.

	<p>USMS676</p> <ul style="list-style-type: none"> · 679 (PREA Hotline) · 678 (Victims Advocate) · 677 (PeaceWorks, Inc.) <p>Through such reviews, the facility meets the standard requirements.</p>
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115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025\ 3. Investigator Training Curriculum 4. Certificate of Completion 8-Hour PREA Investigator Training, dated 3.30.2018 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detective / Investigator <p>The interview with the investigator and personnel file review demonstrated that he had completed investigator training in an in-person class at the Broomfield Police Department. The Investigator stated training consisted of evidence collection, victim interviews, Miranda and Garrity Warnings, and zero tolerance</p> <p>Site Observation:</p> <p>During the pre-audit phase six investigator training certificates for the investigators were uploaded to the online audit system.</p>

(a) The Clear Creek County Jail PAQ states the agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

Policy 902, Prison Rape Elimination Act, page 12-13, section 902.11 Specialized Training; Investigations Policy states, "To ensure that every allegation of sexual abuse at the Clear Creek County Detention Facility is thoroughly and appropriately investigated by a highly skilled, qualified investigator who has been trained to investigate sexual abuse allegations in confinement settings, all sexual abuse investigators shall be required to complete specialized training.

In addition to the general training provided to all employees CCSO shall ensure that, to the extent the agency itself conducts sexual abuse administrative investigations, its investigators have received training in conducting such investigations in confinement settings. This will include initial training and refresher training as needed.

Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement setting, and the criteria and evidence required to substantiate a case for administrative action or law enforcement referral.

CCSO will maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

Any State entity or Department of Justice component that investigates sexual abuse in confinement settings shall provide such training to its agents and investigators who conduct such investigations.

PROCEDURE

All criminal allegations of sexual abuse will be referred to the Clear Creek County Sheriff's Office for investigation. CCSO will require specialized training be completed by investigators who will be conducting investigations of abuse in a confinement setting. Training will include: Investigating Sexual Abuse in a Confinement Setting which will cover Investigative Standards, Investigations, Working with Victims, Interviewing Techniques, and Institutional Culture and Investigations. CCSO will maintain documentation that investigators have completed the required specialized training."

(b) The agency states investigator training has been completed through by the Lincoln County Sheriff's Office which 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.

The facility provided the following document to demonstrate training curriculum topics completed by the Lincoln County Sheriff's Office.

- Investigations
 - o 115.71
 - o 115.72
 - o 115.73
- Collection and Review
 - o 115.76
 - o 115.87
 - o 115.88
 - o 115.89

(c) The Clear Creek County Jail PAQ states the agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. The facility has six employee who has completed investigator training.

The facility provided a Certificate of Completion 8-Hour PREA Investigator Training demonstrating the facility employee has completed specialized training for investigators.

Through such reviews, the facility meets the standard requirements.

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Clear Creek County Jail PAQ
2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025
3. Clear Creek County Sheriff's Office PREA Training Acknowledgment Form - Mental Health and Medical Staff

Interviews:

1. Registered Nurse
2. JBBS Clinical Therapist - Contract

Interviews with medical and mental health staff demonstrated each had completed specialized training for medical and mental health staff through online modules and videos.

Site Observation:

During the pre-audit phase training acknowledgments for the medical and mental health personnel were uploaded to the online audit system. In addition, the facility has one contract mental health provider who has been on extended leave who has not yet completed specialized training; however, the facility knows to have her complete the training upon her return.

(a) The Clear Creek County Jail PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The number of all medical and mental health care practitioners who work regularly at this facility receive the training required by agency policy for four medical and mental health personnel.

Policy 902, Prison Rape Elimination Act, page 13, section 902.12 Medical Mental Health Care Policy states, "CCSO will ensure that all full and part-time medical and mental health care practitioners who work regularly in facilities will receive specialized training in:

1. How to detect and assess signs of sexual abuse and sexual harassment;
2. How to preserve physical evidence of sexual abuse;

	<p>3. How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and</p> <p>4. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>CCSO will maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere. Medical and mental health care practitioners shall also receive the training mandated for employees or for contractors and volunteers depending upon the practitioner's status at the agency.”</p> <p>(b) The Clear Creek County Jail PAQ states their medical staff do not conduct forensic medical exams.</p> <p>(c) The Clear Creek County Jail PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training.</p> <p>The facility provided PREA Training Acknowledgment Form – Mental Health and Medical Staff demonstrating three facility staff have completed the required specialized training. (One facility staff is on sabbatical and will complete the required training upon return, late May.)</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025

3. Clear Creek County Jail Internal Housing Risk Factors, dated

Interviews:

1. Random Inmates
2. Targeted Inmates
3. Sheriff Deputy

Interviews with five targeted and five random inmates demonstrated each remembered being asked questions about their past criminal histories, prior sexual abuse or victimization, how each identified, safety concerns and many other questions about their individual demographics. For those inmates who have been in the facility more than 30 days, each could recall being asked similar questions within a month of being in the facility. Inmates reported staff are very good about making not feel shame when answering questions.

The interview with the Deputy demonstrated risk assessments typically take place in the intake room or at the security desk in a one on one environment to ensure privacy. The Deputy stated during the booking process he explains he gives inmates the opportunity to feel safe and that the answers to their questions are confidential as he assesses if each has been a past victim or perpetrator of sexual abuse, involvement in institutional assault, involved in offenses of sexual assault with an adult or child, their history of violence in and out of confinement settings, how each identifies and the Deputy's own observations of the inmate.

Site Observation:

Utilization of the PREA Audit Adult Prison & Jail Documentation Review Inmate File / Records Review template demonstrated that seven of ten inmates interviewed have been admitted into the facility in the past 12 months. Of those seven inmates each had completed risk assessments within 72 hours of intake and four had completed risk assessments within 30 days of admission into the facility.

(a) The Clear Creek County Jail PAQ states the facility has a policy that requires screening, upon admission or transfer, for risk of sexual abuse victimization or sexual abusiveness toward other Inmates.

Policy 902, Prison Rape Elimination Act, page 13-15, section 902.13 Screening for Risk of Sexual Victimization and Abusiveness Policy states, "CCSO will ensure that the

facility has identified those at heightened risk of being sexually victimized and those at heightened risk of being sexually abusive so that it can make housing and programming decisions with the goal being to use information to prevent sexual abuse.

1. All inmates shall be assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.
2. The intake screening shall ordinarily take place within 72 hours of arrival at the facility.
3. Such assessments shall be conducted using an objective screening instrument.
4. The intake screening shall consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization
 - a. Whether the inmate has a mental, physical, or developmental disability;
 - b. The age of the inmate;
 - c. The physical build of the inmate;
 - d. Whether the inmate has previously been incarcerated;
 - e. Whether the inmate's criminal history is exclusively nonviolent; Whether the inmate has prior convictions for sex offenses against an adult or child to determine if they were likely to be a victim or a perpetrator;
 - f. Is the inmate gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
 - g. Is the inmate perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
 - h. Whether the inmate has previously experienced sexual victimization;
 - i. The inmate's own perception of vulnerability; and
5. The initial screening shall consider prior acts of perpetration of sexual abuse,
 - a. Whether the inmate has perpetrated sexual abuse in an institutional setting;
 - b. Whether the inmate had prior acts of sexual abuse in the community;
 - c. Whether the inmate has current or prior adjudication or convictions for violent offenses (refer to Colorado Revised Statutes regarding classification of violent offenses.)
 - d. Whether the inmate has a history of prior institutional violence.
 - e. Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility will reassess the inmate's risk of victimization or abusiveness

based upon any additional, relevant information received by the facility since the intake screening.

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

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

h. CCSO will implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates. All PREA related documentation will only be available to sworn Law Enforcement personnel. This documentation will be protected by secure password access.

PROCEDURE

CCSO provide each inmate with the Prison Rape Elimination Act (PREA) Zero Tolerance Form for Sexual Assault and Sexual Harassment and have it signed by inmate to ensure they fully understand the statement. Following acknowledgement of the Zero Tolerance Form, a risk assessment will be completed by staff. The risk assessment will include all inmate information described in policy. Information will be confidential and only the scored designation will be available to all staff. The PREA Coordinator will receive information on all inmates who score as high risk for sexual victimization and for sexual abusiveness for the purpose of separating Inmates who are potentially at high risk of abuse from inmates who are at high risk of perpetrating abuse. Risk assessment will be completed within 72 hours of intake and reassessments will be completed within 30 days of arrival. Inmates who report a substantial allegation of sexual abuse at CCSO will receive a reassessment following the reported allegations to update the inmate's risk level.”

(b) The Clear Creek County Jail PAQ states the number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other inmates with 72 hours of their entry into the facility was 461. Policy compliance can be found in provision (a) of this standard.

(c-e) The Clear Creek County Jail PAQ states the facility conducts risk assessments by using an objective screening instrument. The facility does not house inmates solely for civil immigration purposes. The PAQ states, “The Clear Creek County Sheriff’s Office (CCCSO) conducts risk assessments using an objective screening

instrument to identify inmates at risk of sexual victimization or abusiveness.”

The facility provided Clear Creek County Jail Internal Housing Risk Factors which includes the following information.

Name / M/F / ID#

Completed by: / Date

Reviewed by: / Title

1. Former Victim of Institutional Sexual Assault
2. First incarceration ever?
3. Self-Identity as effeminate presentation?
4. Prior Hx of Protective Custody Placements?
5. Does inmate perceive self as vulnerable?
6. Non-Violent Hx?
7. History of Institutional Sexual Activity?
8. Any conviction for sex offense against adult or child including current offense?
9. Youthful age (21 or younger)?
10. Self-identify as transgender or gender non-conforming?
11. Elderly (65 or older)?
12. Self-identify as having a HX of Sexual Victimization?
13. Physical Stature (Males <5'6" or 140 lbs)?
14. Self-identify as having a developmental disability?
15. Self-identify as having a mental illness?

Known Victim (if Yes to question #1 above or potential victim if three or more victim identifiers; if no select "Non Victim")

Designation: Known Victim / Potential Victim / Non-Victim

Override to: Known Victim / Potential Victim / Non-Victim

Rationale (If overrides higher)

16. Do you identify as Gay, Lesbian or Bisexual? Does the intake screening consider at a minimum, the following criteria to assess inmates for risk of sexual victimizations?

17. Is the inmate being detained solely for civil immigration purposes?

Criminal History Evaluation

Score based on the inmate's history and behavior patterns.

1. Does the inmate have a history of violent crimes (assault, armed robbery, homicide, etc.)?
2. Has the inmate been convicted of a sexual offense (e.g., rape, sexual assault)?
3. Does the inmate have a history of predatory behavior in other facilities (documented in prior incarcerations)?
4. Has the inmate been involved in gang-related activity? 5. Does the inmate have a history of stalking or harassment

Risk is determined by the following:

- 0-10 Low Risk / Standard Housing
- 11-20 Moderate Risk / Consider Additional Monitoring
- 21-35 High Risk / Segregation or Close Observation
- 36+ Severe Risk / Immediate Review for High Security Housing

(f) The Clear Creek County Jail PAQ states the policy requires that the facility reassess each inmate's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the inmate's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. The number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 30 days or more) who were reassessed for their risk of sexual victimization or of being sexually abusive with 30 days after their arrival at the facility based upon any additional relevant information received since intake. The PAQ states, "Do not have the ability to track this through hour JMS."

The risk screening tool includes the following 30-day reassessment questions.

Name / ID# / Date: / Completed by

1. Have you experienced any sexual abuse or victimization since your last assessment?
2. Do you feel safe in your current housing assignment? If no, please explain.
3. Have you been placed in protective custody or requested to be placed there since your last assessment?
4. Do you believe you are vulnerable to being sexually victimized while incarcerated? If yes, what makes you feel vulnerable?
5. Have you had any conflicts or issues with other inmates that make you feel unsafe?
6. Since your last assessment, have you observed or experienced any unwanted sexual advances or harassment?
7. Are you currently identifying as or considering identifying as transgender, non conforming, or gender non-conforming?
8. Have you been involved in any consensual sexual activity or relationships since your last assessment? If yes, please provide details.
9. Do you feel any changes in your physical or emotional state that could make you more vulnerable in your housing unit (e.g., illness, mental health concerns)?
10. Since your last assessment, have you been involved in any violent incidents or altercations with other inmates?
11. Do you feel there are any other reasons you are at risk of sexual victimization in your current placement?
12. Have any staff members treated you in a way that makes you feel uncomfortable or unsafe? If yes, please describe the situation.

Additional Observations (Completed by Staff)

1. Does the inmate appear to be more vulnerable than during the previous assessment?
2. Has the inmate been moved to a different housing assignment since the last assessment? If yes, describe the reasons for the move.

	<p>(g) The Clear Creek County Jail PAQ states the policy requires that an inmate's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. Policy compliance can be found in provision (a) of this standard.</p> <p>(h) The Clear Creek County Jail PAQ states the policy prohibits disciplining inmates for refusing to answer (or for not disclosing complete information related to) questions regarding: (a) whether or not the inmate has a mental, physical, or developmental disability; (b) whether or not the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) whether or not the inmate has previously experienced sexual victimization; and (d) the inmate's own perception of vulnerability. Policy compliance can be found in provision (a) of this standard.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Targeted Inmates 2. Detentions Captain / PREA Coordinator 3. Undersheriff <p>Interviews with one gay, one vulnerable, and two cognitive inmates demonstrated they very much trusted staff in all departments, were offered and many had signed up for ongoing mental health services. Inmates stated they were very much respected by all staff and each other and were very comfortable in their housing units.</p>

The interview with the PREA Coordinator demonstrated vulnerable inmates are asked if they would like to be housed in protective custody or general population. If inmates choose general population, they are likely placed in the Eagle Block or the Special Housing Unit.

The interview with the Undersheriff demonstrated the facility makes sure at least one housing unit is between inmates for vulnerable or aggressive inmates to ensure talking does not take place through the walls of the housing unit.

(a) The Clear Creek County Jail PAQ states the facility uses information from the risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

Policy 902, Prison Rape Elimination Act, page 15, section 902.14 Placement of Inmates in Housing, Bed, Program, Educations, and Work Assignments Policy, states, "CCSO shall use all information from the risk screening required 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.

1. CCSO will make individualized determinations about how to ensure the safety of each inmate.
2. In deciding whether to assign a transgender or intersex inmate to a housing unit for male or female inmates, and in making other housing and programming assignments, CCSO shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.
3. Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.
4. A transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration.
5. Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.
6. CCSO will not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in

connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

PROCEDURE

CCSO will use the information from the risk screening to place inmates in appropriate housing assignments, job assignments and program assignments to reduce risk of sexual victimization. If an inmate is identified as transgender or intersex, he/she will be offered a separate time to shower when other inmates are locked down or do not have access to the shower, or in the intake center of the facility during a time that no other bookings are taking place. A transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration.

(b) The Clear Creek County Jail PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each inmate. Policy compliance can be found in provision (a) of this standard.

(c) The Clear Creek County Jail PAQ states the agency/facility makes housing and program assignments for transgender, or intersex inmates in the facility on a case-by-case bases. Policy compliance can be found in provision (a) of this standard.

Through such reviews, the facility meets the standard requirements.

115.43	Protective Custody
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none">1. Clear Creek County Jail PAQ2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none">1. Detentions Captain / PREA Coordinator

The interview with the Detentions Captain demonstrated that it is not the practice of the facility to place vulnerable populations in protective custody; however, each inmate is offered the choice of the Special Housing Unit or general population. The Detentions Captain stated vulnerable populations have not been placed in Special Housing Unit housing in the past 12 months; however, if housed outside of general population each are afforded the same opportunities as those in general population and discussions and documentation of those discussions would take place for any inmate housed for longer than 30 days.

(a) The Clear Creek County Jail PAQ states the agency has a policy prohibiting the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless and an assessment of all available alternatives has been made, and a determination has been made that there is not available alternative means of separation from likely abusers. The number of inmates at risk of sexual victimization who were held in involuntary segregated housing for the past 12 months for one to 24 hours awaiting completion of assessment is not tracked by the facility.

Policy 902, Prison Rape Elimination Act, page 16, section 902.15 Protective Custody Policy states, "CCSO shall ensure that the facility does not automatically or routinely involuntarily segregate inmates at high risk of sexual victimization or restrict their access to programming or other available activities based on their at-risk status.

1. Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.
2. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:
 - a. The opportunities that have been limited;
 - b. The duration of the limitation; and
 - c. The reasons for such limitations.
3. CCSO will assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.
4. If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the CCSO shall clearly document:

	<p>a. The basis for the facility's concern for the inmate's safety; and</p> <p>b. The reason why no alternative means of separation can be arranged.</p> <p>5. Every 30 days, CCSO shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population”</p> <p>(c) The Clear Creek County Jail PAQ states the number of inmates at risk of sexual victimization who were assigned to involuntary segregated housing in the past 12 months, for longer than 30 days while awaiting alternative placement was zero.</p> <p>(d) The Clear Creek County Jail PAQ states from a review of case files of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH (a) a statement of the basis for facilities concerns for the inmate’s safety, and (b) the reason or reason why alternative means of separation could not be arranged was zero.</p> <p>(e) The Clear Creek County Jail PAQ states if an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Clear Creek County Sheriff’s Office Policy 313, Temporary Custody of Adults for Patrol, dated 3.6.2025 4. Clear Creek County Detentions Facility Inmate Handbook, dated 2025

5. Wall Posting of Reporting Contact Information
6. Post Audit: Clear Creek Sheriff's Office Memorandum, dated 6.24.2025
7. Post Audit: Securus Technologies Communications
8. Post Audit: Speed Dial Postings
9. Post Audit: Inmate Handbook

Interviews:

1. Random Inmates
2. Targeted Inmates
3. Deputy Sheriffs

Interviews with the four targeted and five random inmates demonstrated an awareness of reporting options to include calling the speed numbers available near inmate pay phones once they enter their pins, reporting directly to any staff they feel comfortable with, reporting anonymously, through their tablets. Inmates stated staff reply or come and talk to them within an hour when they email them on their tablets.

Interviews with Deputy Sheriffs demonstrated they would accept and report any type of allegation received regardless of the source of the allegation.

Site Observations:

During the tour of the facility, standardized postings to include Sexual Assault brochures in English and Spanish, Hotline speed dial numbers to the facility hotline and community hotlines and Federal Marshall Service hotline.

During the tour, an attempt was made to dial the speed dial numbers to outside reporting entities and learned access to those numbers could not be accessed without entering an inmate pin.

Corrective Action Plan:

- Facility to provide documentation demonstrating the speed dial and US Marshall hotline numbers do not require inmate pins.
- Appropriate facility personnel to provide a memorandum with a sustainable

action plan stating which facility position will ensure all requirements of §115.51 are met and sustained. Memorandum to be addressed to the DOJ PREA Auditor, date and author of the memorandum and standard in question.

- Upload requested documentation to the corresponding provision in the OAS.

Post audit the facility provided a memorandum to the DOJ PREA Auditor from the PREA Coordinator with the following sustainable action plan. "This memorandum serves to affirm the Clear Creek County Jail's commitment to meeting and sustaining the requirements of the following PREA standards, as identified in the recent audit findings. Sustainable action plans for each standard are being implemented, with specific facility positions assigned to ensure ongoing compliance.

Information collection, review, and use: As previously detailed in the memorandum dated June 2, 2025, the On-Call Supervisor will be responsible for ensuring all requirements of this standard are met and sustained. Specifically, the On-Call Supervisor will conduct routine checks once per week during their on-call rotation to verify that the designated PREA hotline and speed dial numbers remain functional and do not require the use of inmate personal identification numbers (PINs). These checks will include test-dialing the numbers from various housing unit phones to confirm confidential access is maintained. The On-Call Supervisor will also ensure that updated postings with the correct speed dial information remain clearly displayed in each housing pod. Any issues with access or functionality will be addressed immediately by coordinating with the phone service provider."

Post audit the facility provided a communication from the Securus Technologies Company demonstrating that speed dial numbers have been put in place for the victim advocate, PREA Coordinator and confidential reporting and none require an inmate pin.

Post audit the facility provided postings demonstrating the facility has painted the following in inmate housing units, above inmate phones in large black letters.

*678 (Victims Advocate)

*680 (PREA Hotline)

*681 (Confidential Reporting)

Post audit the facility provided an Inmate Handbook demonstrating external reporting information has been updated.

(a) The Clear Creek County Jail PAQ states the agency has established procedures allowing for multiple internal ways for inmates to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.

Policy 902, Prison Rape Elimination Act, page 16-17, section 902.16 Inmate Reporting Policy states, "CCSO will ensure that inmates and staff can report sexual abuse and sexual harassment,

regardless of who the perpetrator is and regardless of what other dangers they may face for doing

so, by providing them with multiple avenues to report, including an avenue outside the facility, so

that even if the abuser is someone directly supervising that inmate or higher up in the authority

chain, or a staff person or inmate who might retaliate against that inmate, the victim still has a safe

way to report. Thus, sexual abuse and sexual harassment is encouraged to be reported, which

in turn is a deterrent of future abuse.

1. CCSO will provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

2. CCSO will also provide at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the program 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.

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

4. CCSO will provide inmates with access to tools necessary to make a written report.

5. CCSO will provide a method for staff to privately report sexual abuse and sexual harassment of inmates.

PROCEDURE

Regardless of its source, staff, contractors and/or volunteers who receive information concerning sexual abuse or sexual harassment behavior, or who observe an incident of sexual abuse and sexual harassment, or who have a reasonable cause to suspect that an inmate has been or is being subject to sexual abuse or harassment must immediately report such to his/her supervisor and the shift supervisor and/or designee. Staff cannot remain anonymous and have a duty to report violations. Staff who witness staff on inmate sexual abuse and/or sexual harassment can report privately to the PREA hotline or to the PREA Coordinator. Inmates will have the option of reporting anonymously to an outside organization by calling the PREA Hotline at 1-800-809-2344 at the Colorado Department of Criminal Justice or the Internal Clear Creek County Detentions Facility PREA message line at 303-670-7519 or calling Peace Works Inc. at 303-838-8181 Calls to the PREA hotline are free of charge. Inmates can also file a written grievance, file a written request to medical staff, have a third party report filed on their behalf, and they can report verbally to any staff member.”

On 4.4.2025 at 7:57 am the Auditor contacted Peace Works at 303.838.8181 and the call was answered. After proper introductions and the reason for the call the operator explained he is aware calls could come from the jail and would take the callers information and patch the caller through to an advocate or a backup advocate.

(b) The Clear Creek County Jail PAQ states facility provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency has a policy requiring inmates detained solely for civil immigration purposes be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security.

Policy 313, Temporary Custody of Adults for Patrol, page 3, section 313.4.1 Consular Notification states, “Consular notification may be mandatory when certain foreign nationals are arrested. The Patrol Captain will ensure that the U.S. Department of State’s list of countries and jurisdictions that require mandatory notification is readily available to office members. There should also be a published list of foreign embassy and consulate telephone and fax numbers, as well as standardized notification forms that can be transmitted and then retained for documentation. Prominently displayed signs informing foreign nationals of their rights related to consular notification should also be posted in areas used for the temporary custody of adults.”

The facility provided a photo of the following spray painted on a facility wall.

	<p>USMS676</p> <ul style="list-style-type: none"> · 679 (PREA Hotline) · 678 (Victims Advocate) · 677 (PeaceWorks, Inc.) <p>(c) The Clear Creek County Jail PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. Staff are required to document verbal reports. Policy compliance can be found in provision (a) of this standard.</p> <p>(d) The Clear Creek County Jail PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of inmates. Policy compliance can be found in provision (a) of this standard.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Inmates 2. Targeted Inmates 3. Sergeant <p>Interviews with five targeted and five random inmates demonstrated each were</p>

aware they could complete a written grievance through their tablet or by asking a staff member for a paper grievance. Inmates reported there has never been an issue asking for a grievance; however, none had completed a PREA grievance but they knew the black box by the security desk is where grievances are to be placed.

The interview with the Sergeant demonstrated that grievance boxes are checked seven days per week.

Site Observation:

During the tour a black box was observed on the wall near the security desk.

(a) The Clear Creek County Jail PAQ states the agency has an administrative procedure for dealing with Inmate grievances regarding sexual abuse.

Policy 902, Prison Rape Elimination Act, page 17-18, section 902.16.1, states, "To ensure that the substance of sexual abuse allegations are heard and evaluated by both confinement facilities and federal courts, when appropriate, without being barred by procedural requirements."

(b) The Clear Creek County Jail PAQ states agency policy or procedure allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred. The PAQ states, "The Clear Creek County Sheriff's Office (CCCSO) allows inmates to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred."

Policy 902, Prison Rape Elimination Act, page 17, section 902.16.1, 1-4. states,

1. "CCSO will not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.
2. CCSO may apply otherwise-applicable time limits on any portion of a grievance that does not allege an incident of sexual abuse.
3. CCSO will not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.
4. Nothing in this section shall restrict the agency's ability to defend against a lawsuit filed by an inmate on the ground that the applicable statute of limitations has

expired.”

(c) The Clear Creek County Jail PAQ states the agency’s policy and procedure allows an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency’s policy and procedure require that an inmate grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint.

Policy 902, Prison Rape Elimination Act, page 18, section 902.16.1, 1-2 states, “CCSO will ensure that:

1. An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and
2. Such grievance is not referred to a staff member who is the subject of the complaint.”

(d) The Clear Creek County Jail PAQ states the agency’s policy and procedures that require a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months there has been zero grievances filed alleging sexual abuse. The PAQ states, “Yes, the agency always notifies an inmate in writing when it files for an extension, including notice of the date by which a decision will be made.”

Policy 902, Prison Rape Elimination Act, page 18, section 902.16.1, 3-6 states, CCSO will ensure that:

3. “CCSO will 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.
4. Computation of the 90-day time period shall not include time consumed by inmate in preparing any administrative appeal.
5. CCSO may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the inmate in writing of any such extension and provide a date by which a decision will be made.
6. At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension the inmate may consider the absence of a response to be a denial at that level.”

(e) The Clear Creek County Jail PAQ states agency policy and procedure permit third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates. Agency policy and procedure requires that if an inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the inmate's decision to decline. The number of grievances alleging sexual abuse filed by inmates in the past 12 months in which the inmate declined third-party assistance, containing documentation of the inmate's decision to decline was zero.

Policy 902, Prison Rape Elimination Act, page 18, section 902.16.1, states, "Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of the inmate.

If a third-party file such a request on behalf of the 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.

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

(f) The Clear Creek County Jail PAQ states the facility has a policy and established procedures for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. The facilities policy and procedures for emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours. The facilities policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within five days. Zero grievances were received alleging substantial risk of imminent sexual abuse, which were filed in the past 12 months.

Policy 902, Prison Rape Elimination Act, page 18, section 902.16.1, states, "CCSO will establish procedures for the filing of a PREA complaint alleging that the inmate is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the CCSO will immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision shall document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.”

(g) The Clear Creek County Jail PAQ states the facility has a written policy that limits its ability to discipline an inmate for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the Inmate filed the grievance in bad faith. In the past 12 months, there have been zero grievances alleging sexual abuse to occasions where the agency demonstrated that the Inmate filed the grievance in bad faith.

Policy 902, Prison Rape Elimination Act, page 18, section 902.16.1, states, “CCSO may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.”

Through such reviews, the facility meets the standard requirements.

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Victims Advocate Brochure 4. Memorandum of Understanding PeaceWorks, dated 4.8.2025 <p>Interviews:</p>

1. Random Inmates

2. Targeted Inmates

Interviews with inmates demonstrated many were aware of the victim advocates and that they could report by dialing the number posted near their pay phones. Two inmates who were unaware of victim advocate offerings had an explanation of those benefits explained to them.

Site Observation:

During the tour the speed dial to the advocate was attempted; however, the agency could not be contacted without the use of an inmate pin. (Please see corrective action plan for 115.51). During the pre-audit phase PeaceWorks was contacted. After proper introductions and the reason for the call the volunteer explained victims of sexual abuse would be accompanied during forensic exams and ongoing emotional support services would be offered in person or over the phone, whatever worked best for the victim.

(a) The Clear Creek County Jail PAQ states the facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by:

- The facility provides inmates with access to such services by giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, state, or national victim advocacy or rape crisis organizations.
- The facility provides inmates with access to such services by giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes.
- The facility provides inmates with access to such services by enabling reasonable communication between inmates and these organizations in as confidential a manner as possible.

Policy 902, Prison Rape Elimination Act, page 20, section 902.19 Inmate Access to Outside Confidential Support Services Policy, states, "CCSO will provide inmate's access to outside victim advocates for emotional support services related to sexual abuse.

1. CCSO will provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services

agencies. CCSO will enable reasonable communication between inmates and these organizations and agencies, in as confidential manner as possible.

2. CCSO will 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.

3. CCSO will maintain a list of resources of community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse. CCSO will maintain copies of any agreements or documentation showing attempts to enter into such agreements.

PROCEDURE Victim advocates are available 24/7. Inmates can call a victims advocate free of charge and CCSO will not record those calls. Written correspondences are not treated as confidential and would be subject to inspection unless considered legal mail.”

(b) The Clear Creek County Jail PAQ states the facility informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs inmates, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law.

Victims advocate brochure with Clear Creek County Victim’s Advocates Office address and telephone number.

(c) The Clear Creek County Jail PAQ states the facility maintains memoranda of understanding with community service providers that are able to provide inmates with emotional support services related to sexual abuse.

The facility provided a Memorandum of Understanding for Cooperative Relations between Clear Creek County Sheriff’s Office and PeaceWorks, Inc. The memorandum appears to be current and does not have an expiration date. The memorandum is signed by the Clear Creek County Sheriff the PeaceWorks Executive Director and the PeaceWorks Board Chair.

Through such reviews, the facility meets the standard requirements.

115.54	Third-party reporting
	<p data-bbox="256 188 959 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 300">Auditor Discussion</p> <p data-bbox="256 340 523 376">Document Review:</p> <ol data-bbox="256 412 711 448" style="list-style-type: none"> <li data-bbox="256 412 711 448">1. Clear Creek County Jail PAQ <p data-bbox="256 555 416 591">Interviews:</p> <ol data-bbox="256 627 568 878" style="list-style-type: none"> <li data-bbox="256 627 568 663">1. Random Inmates <li data-bbox="256 698 568 734">2. Targeted Inmates <li data-bbox="256 770 568 806">3. Deputy Sheriffs <li data-bbox="256 842 568 878">4. Supervisory staff <p data-bbox="256 913 1477 1030">Interviews with five random and five targeted inmates demonstrated an awareness of third-party reporting and reporting options included talking with their therapist, family, friends or through the numbers posted on the wall in their Blocks.</p> <p data-bbox="256 1137 1453 1254">Interviews with Deputy Sheriffs and facility personnel demonstrated each would accept a third-party report and immediately report the allegation to their immediate supervisor and the PREA investigator.</p> <p data-bbox="256 1361 504 1397">Site Observation:</p> <p data-bbox="256 1433 1461 1514">The agency brochure with third party information was observed in the reception area of the facility with third party contact information.</p> <p data-bbox="256 1621 1469 1827">(a) The Clear Creek County Jail PAQ states the facility provides a method to receive third-party reports of inmate sexual abuse or sexual harassment. The agency publicly distributes information on how to report Inmate sexual abuse or sexual harassment on behalf of inmates. The PAQ states, "https://www.co.clear-creek.co.us/FormCenter/Sheriffs-Office-8/Prison-Rape-Elimination-Act-PREA-Report-72◆◆◆"</p> <p data-bbox="256 1935 1437 2051">On 4.4.2025 the Auditor accessed the URL above and completed the Prison Rape Elimination Act (PREA) Report at 9:00 am. The report has the reporter complete the following information.</p>

	<ul style="list-style-type: none"> · Date & Time of Offense · Victim · Witness · Suspect · Location · Reporting Party · Phone · Email · Address · City / State · ZIP · Statement Details <p>On 4.4.2025 at 9:21 am a response to the online PREA submission form was received and verified via email from the Jail Captain.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Deputy Sheriffs

2. Medical and Mental Health staff
3. Investigator
4. Detentions Captain / PREA Coordinator

Interviews with the facility personnel demonstrated each actively practices and understands the importance of immediately reporting all allegations of sexual abuse and sexual harassment immediately to their direct supervisor or the PREA investigator.

The interview with the PREA Coordinator demonstrated the facility would notify the County Department of Social Services for vulnerable adults who are victims of sexual abuse.

Site Observations:

The facility has had two sexual harassment allegations reported, one reported to mental health staff and one reported in person to reception desk personnel. Both allegations were investigated within two weeks of the initial report.

(a/d) The Clear Creek County Jail PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy any retaliation against Inmates or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The PAQ states, "Our agency requires all staff to report immediately and in accordance with agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of our agency."

Policy 902, Prison Rape Elimination Act, page 19, section 902.18 Staff and Agency Reporting Duties; Reporting of Allegations Policy 1. states, "To establish a strong, effective reporting culture among staff and ensure that the facility receive timely information about sexual abuse, sexual harassment, retaliation, and staff neglect or violations of responsibilities that may have contributed to an incident or retaliation. The standard requires the agency to ensure facility staff report all allegations, while also taking steps to protect the confidentiality of sexual abuse information by sharing internally with only those who need to know.

1. CCSO will require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.”

(b) The Clear Creek County Jail PAQ states, apart from reporting to designated supervisors or official and designated state or local service agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

Policy 902, Prison Rape Elimination Act, page 19, section 902.18 Staff and Agency Reporting Duties; Reporting of Allegations Policy 2-4. State,

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

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

4. CCSO will report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators or PREA Coordinator.”

Through such reviews, the facility meets the standard requirements.

115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:
	1. Clear Creek County Jail PAQ
	2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated

3.6.2025

Interviews:

1. Detentions Captain / PREA Coordinator
2. Undersheriff

The interview with the Detentions Captain demonstrated that it is not the practice of the facility to place vulnerable populations in protective custody; however, each inmate is offered the choice of the Special Housing Unit or general population. The Detentions Captain stated vulnerable populations have not been placed in Special Housing Unit housing in the past 12 months; however, if housed outside of general population each are afforded the same opportunities as those in general population and discussions and documentation of those discussions would take place for any inmate housed for longer than 30 days.

The interview with the Undersheriff demonstrated all staff are advocates for these inmates and that all staff are cognizant how they answer them from the first interaction until they can get them to medical and or mental health. The Undersheriff stated we take a little extra time with them to make sure they are aware of how they are placed and pass on this information to other shifts.

(a) The Clear Creek County Jail PAQ states when the agency or facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the Inmate. In the past 12 months, the facility reports that zero inmates were subject to substantial risk of imminent sexual abuse. Upon discovery of inmates being subject to substantial risk, the facility immediately separates the victim from the perpetrator, made notification and completed incident reporting requirements. The PAQ states, "When our agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, immediate action is taken to protect the inmate.

Policy 902, Prison Rape Elimination Act, page 20, section 902.20 Facility Protection Duties Policy states, "When CCSO learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.

PROCEDURE

All inmates will complete a Risk Assessment at intake to determine housing classification. CCSO will not house known or potential victims with known or potential

	<p>aggressors.”</p> <p>Through such reviews the facility meets the standard requirements.</p>
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115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Undersheriff / Agency Head <p>The interview with the Undersheriff demonstrated that he was aware that upon receiving an allegation that an inmate was sexually abused while confined at another facility, Command staff would immediately notify the head of the facility from the facility where the allegation was alleged to have occurred. The Undersheriff stated communication to the receiving head of the facility would be maintained in a case report and through email communication.</p> <p>(a) The Clear Creek County Jail PAQ states the agency has a policy requiring that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency’s policy also requires that the head of the facility notify the appropriate investigative agency. In the past 12 months the facility has received zero allegations that an inmate was abused while in confinement at another facility.</p> <p>Policy 902, Prison Rape Elimination Act, page 20-21, section 902.21 Reporting to Other Confinement Facilities Policy states, “To ensure that allegations of custodial sexual abuse that are reported to any facility are timely investigated by the facility where the abuse allegedly occurred. The intent of the standard is to urge facility heads to send the notification to an individual or office that will ensure the facility</p>

takes immediate steps to investigate the allegation appropriately and promptly. It is important that the person receiving the report of sexual abuse at the facility understands the seriousness and gravity of the allegation, and that the communication originated at the highest level of the reporting facility.

Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred and shall also notify the appropriate investigative agency.

Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.

CCSO will document that it has provided such notification.

The facility head that receives such notification shall ensure that the allegation is investigated in accordance with these standards.”

(b) The Clear Creek County Jail PAQ states agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation.

Policy 902, Prison Rape Elimination Act, page 221, section 902.21 Reporting to Other Confinement Facilities Procedure states, “If any inmate at intake, or any other time, reports being sexually abused in another facility, staff will immediately notify the supervisor who will relay the information to the Captain. The Captain will then contact the head of the facility of the agency where the alleged abuse occurred and shall notify the Sheriff. Notification will be made no later than 72 hours after receiving the allegation and will be documented.”

(c) The Clear Creek County Jail PAQ states the facility documents that it has not had a need to provide such notification within 72 hours of receiving the allegation.

(d) The Clear Creek County Jail PAQ states facility policy requires that allegations received from other agencies or facilities are investigated in accordance with the

	<p>PREA standards. In the last 12 months, there have been zero allegations of sexual abuse.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Deputy Sheriffs <p>Interviews with Deputy Sheriffs demonstrated upon response to a sexual assault event they would separate those involved, report to their direct supervisor, attempt to preserve evidence by clearing the scene and keeping it as it was, explaining to the victim that it is in their best interest to not wash, change, eat or use the restroom; telling the perpetrator he or she cannot wash, change or use the restroom; move parties to separate rooms that are dry; wait for further instructions from supervisory staff.</p> <p>(a) The Clear Creek County Jail PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to separate, preserve, protect, collect 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. 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. In the past 12 months, one allegation occurred where an inmate was sexually abused and a staff member separated the alleged victim and</p>

abuser. The PAQ states, "Our agency has a first responder policy for allegations of sexual abuse to ensure the victim's immediate safety and the preservation of evidence."

Policy 902, Prison Rape Elimination Act, page 21-22, section 902.22 Staff First Responder Duties Policy states, "To ensure that the first security staff member to respond to an allegation or report of sexual abuse addresses the victims' immediate safety and maintains security and control over the crime scene so that any physical evidence is preserved until an investigator arrives. Investigators will then have access to evidence that has not been accidentally or negligently compromised or destroyed, which will safeguard the quality of the investigation.

PROCEDURE

The first staff member to respond to an incident shall be required to:

1. Separate the alleged victim and abuser;
2. Preserve and protect the scene until appropriate steps can be taken to collect any evidence.
3. If the abuse occurred within a time period that still allows for the collection of physical evidence, strongly encourage 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.
4. If the abuse occurred within at time period that still allows for the collection of physical evidence, ensure that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
5. If the first staff responder is not a security staff member, the responder shall be required to strongly encourage that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. The staff member shall do everything in their power to keep the victim safe."

(b) The Clear Creek County Jail PAQ states the facility's' policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that an inmate was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero.

Through such reviews, the facility meets the standard requirements.

115.65	Coordinated response
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 523 378">Document Review:</p> <ol data-bbox="256 412 1238 517" style="list-style-type: none"><li data-bbox="256 412 711 445">1. Clear Creek County Jail PAQ<li data-bbox="256 479 1238 517">2. To Do List: PREA Allegations at Clear Creek County Jail, not dated <p data-bbox="256 629 416 663">Interviews:</p> <ol data-bbox="256 696 871 730" style="list-style-type: none"><li data-bbox="256 696 871 730">1. Detentions Captain / PREA Coordinator <p data-bbox="256 775 1417 880">Interviews with the Detentions Captain demonstrated the facility coordinated response is a checklist that is kept electronically, and all staff have access via the computer system.</p> <p data-bbox="256 999 504 1032">Site Observation:</p> <p data-bbox="256 1066 1425 1144">Review of the facilities Coordinated Response Plan demonstrates clear direction to staff to ensure first responder duties are fulfilled.</p> <p data-bbox="256 1256 1445 1536">(a) The Clear Creek County Jail PAQ states the facility developed 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. The PAQ states, "Our facility has developed 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 data-bbox="256 1648 1437 1727">The facility provided a To Do List: PREA Allegations at Clear Creek County Jail which includes the following elements.</p> <ol data-bbox="256 1760 828 2085" style="list-style-type: none"><li data-bbox="256 1760 804 1794">1. Allegation Reported to CCSO Staff<ol data-bbox="256 1827 576 1939" style="list-style-type: none"><li data-bbox="256 1827 576 1861">a. Inmate-on-Inmate<li data-bbox="256 1895 544 1939">b. Staff-on-Inmate<li data-bbox="256 1973 828 2007">2. Immediate Response by CCSO Staff<li data-bbox="256 2040 485 2074">3. Notification

	<ul style="list-style-type: none"> a. Inmate-on-Inmate 4. Initial Medical and Mental Health 5. Investigation Initiation a. Inmate-on-Inmate b. Staff-on-Inmate 6. Administrative Review 7. Disciplinary Actions a. Inmate-on-Inmate b. Staff-on-Inmate 8. Support Services for Victim 9. Documentation and Reporting 10. Follow-Up <p>Through such reviews, the facility meets the standard requirements.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ul style="list-style-type: none"> 1. Clear Creek County Jail PAQ <p>Interview:</p> <ul style="list-style-type: none"> 1. Undersheriff <p>The interview with the Undersheriff demonstrated that the facility is not responsible for collective bargaining.</p> <p>(a) The Clear Creek County Jail PAQ states the agency, facility, or any other</p>

	<p>governmental entity responsible for collective bargaining on the agency’s behalf has not entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.67	Agency protection against retaliation
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Clear Creek County Sheriff’s Office Retaliation Monitoring Form, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detentions Lieutenant <p>The interview with the Detention Lieutenant demonstrated he begins retaliation monitoring as soon as the allegation is received. The Detention Lieutenant immediately has a conversation with the victim and explains processes of retaliation monitoring. The Detention Lieutenant stated he monitors for signs from the victim to include depression, anger, secluding themselves, not eating, and talking with other staff regarding what the victim may be reporting or discussing. The Detention Lieutenant stated he monitors for retaliation for 90 days or as long as is necessary and periodic checks are documented on the retaliation monitoring form.</p> <p>Site Observation:</p> <p>The facility has not received a sexual abuse allegation requiring retaliation monitoring in the past 12 months.</p> <p>(a) The Clear Creek County Jail PAQ states the agency has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with</p>

sexual abuse or sexual harassment investigations from retaliation by other inmates or staff. The agency designates the following staff positions for retaliation monitoring are the Programs Section, Custody Section a Lieutenant and Sergeant.

Policy 902, Prison Rape Elimination Act, page 24-25, section 902.25 Facility Protection Against Retaliation Policy states, "Inmate, staff, contractors, volunteers, or third-party reporters who choose to file a report of sexual abuse or sexual harassment, or cooperate with an investigation, shall not be subject to any form of retaliation related to the reporting of or participation in an investigation of such.

CCSO will establish 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 and shall designate which staff members or departments are charged with monitoring retaliation.

CCSO will 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.

1. For at least 90 days following a report of sexual abuse, CCSO will monitor 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 shall act promptly to remedy any such retaliation. Items CCSO should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. CCSO shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.
2. In the case of inmates, such monitoring shall also include periodic status checks.
3. If any other individual who cooperates with an investigation expresses a fear of retaliation, CCSO shall take appropriate measures to protect that individual against retaliation.
4. CCSO's obligation to monitor shall terminate if CCSO determines that the allegation is unfounded or if the inmate is no longer at the CCSO Detention Facility."

(c-d) The Clear Creek County Jail PAQ states the facility monitors the conduct or treatment of inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are any changes that may

suggest possible retaliation by inmates or staff. The length of time that the facility monitors the conduct of treatment is 90 days. The facility acts promptly to remedy any such retaliation. The agency/facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. In the past 12 months, the facility has had zero incidents of retaliation. The PAQ states, "Our agency continues monitoring beyond 90 days if the initial monitoring indicates a continuing need to protect individuals from retaliation."

Policy 902, Prison Rape Elimination Act, page 24-25, section 902.25 Facility Protection Against Retaliation Procedure states, "CCSO will protect all inmates and staff who report sexual abuse or sexual harassment from retaliation by other inmates and staff. The PREA Coordinator will monitor for retaliation for at least 90 days following a report of sexual abuse. Monitoring will be completed via face-to-face contact with the inmate or staff monthly, and will include review of any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Monitoring will also include periodic status checks of the inmate. If any individual who cooperated with an investigation expresses a fear of retaliation, CCSO will take appropriate measures to protect that individual against retaliation. Retaliation monitoring will terminate if the allegation is unfounded; if it is unsubstantiated, or substantiated, monitoring will continue for 90 days. If a report is made by a staff member who reported the incident after witnessing sexual assault and are reporting on behalf of the inmate, the PREA Coordinator will monitor the reporting staff member for retaliation. CCSO will not put victims in involuntary segregated housing unless it is necessary for the inmate's protection. CCSO will offer all staff members who fear retaliation emotional support services."

The facility provided a Clear Creek County Sheriff's Office Retaliation Monitoring form documenting the following information.

- Name / Inmate ID #: / Housing Location
- Date of alleged incident / Type of Incident
- Date of Report / Date Monitoring Began / Staff Assigned to Monitor
- Initial 30-Day Check / Date / Retaliation Observed or Reported / If yes explain / Action taken
- 60-Day Check / Date / Retaliation Observed or Reported / If yes explain / Action taken
- 90-Day Check / Date / Retaliation Observed or Reported / If yes explain / Action taken
- Monitoring Notes / Additional Observations

	<p>Reviewed by: PREA Coordinator / Date / Facility Commander / Supervisor / Date</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detentions Captain / PREA Coordinator <p>The interview with the Detentions Captain demonstrated that it is not the practice of the facility to place vulnerable populations in protective custody; however, each inmate is offered the choice of the Special Housing Unit or general population. The Detentions Captain stated vulnerable populations have not been placed in Special Housing Unit housing in the past 12 months; however, if housed outside of general population each are afforded the same opportunities as those in general population and discussions and documentation of those discussions would take place for any inmate housed for longer than 30 days.</p> <p>(a) The Clear Creek County Jail PAQ states the agency has a policy prohibiting the placement of inmates who allege to have suffered sexual abuse 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. The number of inmates who alleged to have suffered sexual abuse held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero. The PAQ states, “Our agency prohibits placing inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been conducted, and a determination has been made that no alternative means of separation from likely abusers is available.”</p>

Policy 902, Prison Rape Elimination Act, page 16, section 902.15 Protective Custody Policy states, “CCSO shall ensure that the facility does not automatically or routinely involuntarily segregate inmates at high risk of sexual victimization or restrict their access to programming or other available activities based on their at-risk status.

1. Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment.

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

- a. The opportunities that have been limited;
- b. The duration of the limitation; and
- c. The reasons for such limitations.

3. CCSO will assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.

4. If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the CCSO shall clearly document:

- a. The basis for the facility's concern for the inmate's safety; and
- b. The reason why no alternative means of separation can be arranged.

5. Every 30 days, CCSO shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.”

Through such reviews, the facility meets the standard requirements.

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

Document Review:

1. Clear Creek County Jail PAQ
2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025
3. Post Audit: PREA Investigator Training Roster, dated 5.28.2025
4. Post Audit: Clear Creek County Sheriff's Office Memorandum, dated 6.2.2025

Interviews:

1. Detective / Criminal and Administrative Investigator
2. Detentions Captain / PREA Coordinator

The interview with the investigator demonstrated that he begins investigations immediately upon receipt of an allegation of sexual harassment or sexual abuse. The Investigator stated steps taken during investigations include ensuring the victim is safe, ensuring the scene is secured, securing any possible evidence, his understanding of the type of allegation, coordinating actions with everyone involved, accessing medical and mental health services, begin all appropriate interviews, if staff are alleged to have been involved in the allegation the investigator would contact the Colorado Bureau of Investigation for staff interviews, review staff files and inmate jackets to review prior complaints and involvement with PREA allegations and or investigations.

The interview with the PREA Coordinator demonstrated the facility investigator stays in contact with any external investigators who continually reports investigation information to the PREA Coordinator.

Site Observation:

The facility has had two sexual harassment investigations in the past 12 months. Both investigations were reviewed through utilization of the PREA Audit - Adult Prisons & Jails Investigations documentation review template. Investigation review did not demonstrate provision (a)(c)(e) and (f)-(1) were documented on each of those investigations.

Corrective Action Plan:

- Facility to provide documented education with investigators that was completed during the onsite review with investigators.

- Appropriate facility personnel to provide a memorandum with a sustainable action plan stating which facility position will ensure all requirements of §115.71 are met and sustained. Memorandum to be addressed to the DOJ PREA Auditor, date and author of the memorandum and standard in question.

- Upload requested documentation to the corresponding provision in the OAS.

Post audit the facility provided a PREA Investigation Training Roster demonstrating all facility administrative and criminal investigators were trained on each component required for this standard.

Post audit the facility provided a memorandum from the PREA Coordinator addressed to the DOJ PREA Audit with the following sustainable action plan. "Agency investigations: The Clear Creek County Investigations Division will be responsible for ensuring that all agency investigations into allegations of sexual abuse and sexual harassment are conducted promptly, thoroughly, and objectively, adhering to the requirements outlined in this standard, including evidence gathering, interviewing, credibility assessments, and the consideration of staff actions or failures to act. As the PREA Coordinator for the Clear Creek County Jail, I will oversee the implementation and ongoing adherence to these sustainable action plans. I will ensure that the assigned personnel are equipped with the necessary resources and training to fulfill their responsibilities effectively. We are committed to addressing the findings of the audit and maintaining full compliance with all PREA standards."

(a) The Clear Creek County Jail PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

Policy 902, Prison Rape Elimination Act, page 25-26, section Criminal and Administrative Agency In Investigations Policy states, "CCSO will ensure that all allegations of sexual abuse and sexual harassment are investigated thoroughly and properly so that incidents are substantiated when they should be, both to deter these incidents and to increase reporting.

1. When CCSO conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

2. Where sexual abuse is alleged, CCSO shall use investigators who have received special training in sexual abuse investigations.

3. Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic

monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.

4. When the quality of evidence appears to support criminal prosecution, CCSO shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

5. The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. CCSO will not require 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.”

(h) The Clear Creek County Jail PAQ states there has been zero allegations of conduct that appears to be criminal that was referred for prosecution, since the last audit date.

Policy 902, Prison Rape Elimination Act, page 26, section Criminal and Administrative Agency In Investigations Procedure states, “Investigations of sexual abuse will be referred to The Clear Creek County Sheriff's Office. Deputies who respond for investigation will have completed special training in sexual abuse investigations.”

(i) The Clear Creek County Jail PAQ states the agency retains all written reports pertaining to administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Policy 902, Prison Rape Elimination Act, page 25-26, section Criminal and Administrative Agency In Investigations Policy states,

“Administrative investigations:

1. Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and

2. Shall 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.

	<p>Criminal investigations:</p> <ol style="list-style-type: none"> 1. Shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attach copies of all documentary evidence where feasible. 2. Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution. 3. The CCSO shall retain all written reports for as long as the alleged abuser is incarcerated or employed by CCSO, plus five years. 4. The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation. 5. Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements. 6. When outside agencies investigate sexual abuse, CCSO shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.” <p>Through such reviews, the facility meets the standard requirements.</p>
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115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detective / Investigator <p>The interview with the Investigator demonstrated the facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p>

(a) The Clear Creek County Jail PAQ states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated.

Policy 902, Prison Rape Elimination Act, page 26-27, section 902.28 Evidentiary Standard for Administrative Investigation Policy states, "To ensure that all administrative investigations into allegations of sexual abuse and sexual harassment use the correct standard of proof - a preponderance of the evidence, which means the greater weight of the evidence.

Using the proper evidentiary standard enables an agency to substantiate actual incidents of sexual abuse and sexual harassment in noncriminal investigations. Consistent, properly done investigations into allegations, including using the appropriate evidentiary standard, will increase the chances that consequences will follow substantiated reports of sexual abuse and sexual harassment while also encouraging reporting and deterring further abuse. CCSO will impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated."

Through such reviews, the facility meets the standard requirements.

115.73 Reporting to inmates	
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: <ol style="list-style-type: none">1. Clear Creek County Jail PAQ2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.20253. Clear Creek County Sheriff's Office PREA Investigation Outcome Notification Form, not dated
	Interviews: <ol style="list-style-type: none">1. Detentions Captain / PREA Coordinator

The interview with the PREA Coordinator demonstrated notification requirements to victims are given verbally and in writing by himself the Detentions Lieutenant or the Investigator. Documentation of notifications are documented on the PREA Investigation Outcome Notification Form.

On Site Observation:

The facility has not received an allegation of sexual abuse in the past 12 months.

(a) The Clear Creek County Jail PAQ states the agency has a policy requiring that any inmate who alleges that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the agency/facility in the past 12 months was one. Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of inmates who were notified, verbally or in writing, of the results of the investigation was one.

Policy 902, Prison Rape Elimination Act, page 27, section 902.29 Reporting to Inmates states, "To ensure agencies increase the likelihood that inmates will report incidents of sexual abuse, by ensuring that their reports will be taken seriously and fully investigated. Inmates may not be aware of the steps CCSO will take to address a report of sexual abuse, and informing inmates of the results of investigations will, at a minimum, let the inmate know that the report has been addressed and investigated.

Following an investigation into an inmate's allegation that he or she suffered sexual abuse at the CCSO facility, CCSO shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If CCSO did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the inmate."

The facility provided a PREA Investigation Outcome Notification form documenting the following information.

Victim Name / Case Number / Date of Report / Date of Notification

· Investigation Outcome

- o Substantiated – The investigation determined that the allegation was supported by sufficient evidence.
- o Unsubstantiated – The investigation could not determine whether the alleged incident occurred.
- o Unfounded – The investigation determined that the alleged incident did not occur.
- o Referred to another agency – The investigation was referred to [Agency Name] for further action.

The form is signed the Investigator.

(b) The Clear Creek County Jail PAQ states this standard is not applicable as the facility conducts administrative and sexual abuse investigation.

(c) The Clear Creek County Jail PAQ states following an inmate’s allegation that a staff member has committed sexual abuse against the inmate, the agency/facility subsequently informs the Inmate (unless the agency 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 the facility;
- The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.”

Policy 902, Prison Rape Elimination Act, page 27-28, section 902.30 All Notifications or Attempted Notifications shall Be Documented Procedure states, “Staff on Inmate Allegations: Following an investigation into an inmate's allegation of sexual abuse suffered at the CCSO jail, the inmate will be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. If the investigation was completed by the Clear Creek County Sheriff's Office, CCSO will request the relevant information in order to inform the inmate. Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, CCSO will inform the inmate (unless the program has determined that the allegation is unfounded) whenever:

1. The staff member is no longer posted within the inmate's unit;

2. The staff member is no longer employed at CCSO;
3. The staff member has been indicted on a charge related to sexual abuse within CCSO; or
4. The staff member has been convicted on a charge related to sexual abuse within CCSO.

Inmate on Inmate Allegations: Following an inmate's allegation that he or she has been sexually abused by another inmate, CCSO will inform the alleged victim whenever:

1. The alleged abuser has been indicted on a charge related to sexual abuse within CCSO; or
2. The alleged abuser has been convicted on a charge related to sexual abuse within CCSO.

All such notifications or attempted notifications shall be provided to the inmate in writing) and be kept in the inmate's file. Note: Obligation to report outcomes to the inmate shall terminate if the inmate is released from the agency.”

(d) The Clear Creek County Jail PAQ states following an inmate’s allegation that he or she has been sexually abused by another inmate in an agency facility, the agency subsequently informs the alleged victim whenever: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. Policy compliance can be found in provision (c) in this standard.

(e) The Clear Creek County Jail PAQ states the agency has a policy that all notifications to inmates described under this standard are documented. In the past 12 months, there has been zero notifications to an inmate, pursuant to this standard.

Through such reviews the facility meets the standard requirements.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Clear Creek County Jail PAQ
2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025

Interviews:

1. Detentions Captain / PREA Coordinator

The interview with the Detentions Captain demonstrated employees would no longer have access to inmates, criminal justice process would take place, if post certified, post would be notified as well as any applicable DORA licensing agencies and ongoing institutional reference checks would be completed with offense history.

Site Observation:

In the last 12 months, the facility had zero staff who was disciplined for violation of an agency sexual abuse or sexual harassment policy.

(a) The Clear Creek County Jail PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

Policy 902, Prison Rape Elimination Act, page 28, section Disciplinary Sanctions for Staff Policy states, "To protect inmates from staff sexual abuse and sexual harassment, and to hold staff accountable for violating CCSO sexual abuse or sexual harassment policies.

Staff shall be subject to disciplinary sanctions up to and including termination for violating CCSO sexual abuse or sexual harassment policies.

Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

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

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

(b) The Clear Creek County Jail PAQ states in the last 12 months, there has been zero staff from the facility that have violated agency sexual abuse or sexual harassment policies.

(c) The Clear Creek County Jail PAQ states 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. In the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies (other than actually engaging in sexual abuse) is zero. Policy compliance can be found in provision (a) of this standard.

(d) The Clear Creek County Jail PAQ states 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. In the past 12 months, zero staff have been terminated for sexual abuse or harassment.

Policy 902, Prison Rape Elimination Act, page 28, section Disciplinary Sanctions for Staff Procedure states, “Any CCSO staff member under investigation for sexual abuse will be placed on administrative leave pending the investigation to eliminate contact between the inmate and the abuser.”

Through such reviews, the facility meets the standard requirements.

115.77 Corrective action for contractors and volunteers

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Clear Creek County Jail PAQ
2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025

Interviews:

1. Detentions Captain / PREA Coordinator

The interview with the Detentions Captain demonstrated volunteers or contractors would no longer have access to inmates, criminal justice process would take place, their employers would be notified as well as any applicable DORA licensing agencies.

Site Observation:

The facility has not had any volunteers or contractors subject to disciplinary action due to violating sexual abuse or sexual harassment policies.

(a) The Clear Creek County Jail PAQ states 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. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with inmates. In the past 12 months, there have been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of inmates.

Policy 902, Prison Rape Elimination Act, page 29, section 902.32 corrective Action for Contractors and Volunteers Policy states, "To protect inmates from sexual abuse and sexual harassment from contractors and volunteers, and to hold contractors and volunteers accountable for violating CCSO sexual abuse or sexual harassment policies. Consistent and meaningful corrective actions demonstrate CCSO's commitment to sexual safety, and ensure that contractors and volunteers follow agency policies, thus deterring sexual abuse and sexual harassment of inmates in the facility.:

(b) The Clear Creek County Jail PAQ states the facility 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.

Policy 902, Prison Rape Elimination Act, page 29, section 902.32 corrective Action for Contractors and Volunteers Procedure states, "Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies and to any relevant licensing bodies unless the activity was clearly not criminal. CCSO will take appropriate corrective measures and will consider whether to prohibit further contact with inmate, in the case of any violations of CCSO sexual abuse or sexual harassment policies by a contractor or volunteer."

Through such reviews, the facility meets the standard requirements.

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

1. Clear Creek County Jail PAQ
2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025

Interviews:

1. Detentions Captain / PREA Coordinator

The interview with the Detentions Captain demonstrated that inmate aggressors would be separated from their victim, placed in the Special Housing Unit, criminal justice processes would begin and the aggressor would always be kept separate from their victim.

Site Observation:

The facility as not had a sexual abuse allegation in the past 12 months.

(a) The Clear Creek County Jail PAQ states inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. In the past 12 months there have been zero administrative findings of inmate-on-inmate sexual abuse.

Policy 902, Prison Rape Elimination Act, page 29-30, section Interventions and Disciplinary Sanctions for Inmates Policy states, "To ensure that inmates are held accountable for inmate-on-inmate sexual abuse through a formal disciplinary process that provides appropriate and measured sanctions commensurate with the nature and circumstances of the abuse, the inmate's disciplinary history and sanctions imposed for comparable offenses by inmates with similar histories. Imposing consistent disciplinary sanctions demonstrates CCSO's commitment to sexual safety and helps deter sexual abuse. The disciplinary process considers factors such as mental capacity, intent, and what resources or supports can be offered to the inmate abuser to support rehabilitation.

Procedure

CCSO promotes a safe environment with established rules that are designed to protect the inmate and staff. Inmates shall understand the program rules, as well as the consequences for not meeting them. Rule violations shall be addressed through a consistent and fair process as outlined in the Inmate Handbook.

An inmate will be 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.

Any disciplinary sanctions will be 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 shall consider 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.

CCSO will discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

CCSO will not issue disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

(d) The Clear Creek County Jail PAQ states the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. The facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse, the facility considers whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

(e) The Clear Creek County Jail PAQ states the agency disciplines inmates for sexual contact with staff only upon finding that the staff member did not consent to such contact. Policy compliance can be found in provision (a) of this standard.

(f) The Clear Creek County Jail PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

(g) The Clear Creek County Jail PAQ states the agency prohibits all sexual activity between inmates. If the agency prohibits all sexual activity between inmates and disciplines inmates for such activity, the agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced. Policy compliance can be found in provision (a) of this standard.

Through such reviews, the facility meets the standard requirements.

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Clear Creek County Jail PAQ
2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025
3. Post Audit: Clear Creek County Sheriff's Office Memorandum, dated 6.2.2025
4. Post Audit: Clear Creek County Jail Medical and Mental Health Follow-up Tracking Form

Interviews:

1. Random Inmates
2. Targeted Inmates
3. Registered Nurse
4. JBBS Clinical Therapist - Contractor

Interviews with five random and five targeted inmates demonstrated each were offered medical and mental health services are on offered regardless of if inmates have past victimization or have perpetrated in the past.

Interviews with medical and mental health staff demonstrated inmates who disclose past victimization or perpetration are prioritized and are seen within in 14 days, typically much sooner as medical staff are in the facility and mental health services two to three times per week.

Site Observation:

Review of facility files demonstrated a documented system is not currently in place demonstrating date of mental health referrals and date those applicable inmates are seen by medical and or mental health services.

Corrective Action Plan:

- Facility to provide a system demonstrating dates vulnerable and aggressive inmates are offered and receive medical and mental health services. (If the inmate refuses services, date of refusal).
- Appropriate facility personnel to provide a memorandum with a sustainable action plan stating which facility position will ensure all requirements of §115.81 are

met and sustained. Memorandum to be addressed to the DOJ PREA Auditor, date and author of the memorandum and standard in question.

- Upload requested documentation to the corresponding provision in the OAS.

Post audit the facility provided a memorandum from the PREA Coordinator to the DOJ PREA Auditor with the following sustainable action plan. "Medical and mental health follow-up: The Shift Supervisor will be responsible for ensuring that jail inmates identified as having experienced prior sexual victimization are offered a follow-up meeting with a medical or mental health practitioner within 14 days of intake screening, and for documenting the offer and receipt (or refusal) of these services. As the PREA Coordinator for the Clear Creek County Jail, I will oversee the implementation and ongoing adherence to these sustainable action plans. I will ensure that the assigned personnel are equipped with the necessary resources and training to fulfill their responsibilities effectively. We are committed to addressing the findings of the audit and maintaining full compliance with all PREA standards."

Post audit the facility provided a Clear Creek County Jail Medical and Mental Health Follow-up Tracking form demonstrating the following is documented.

- Intake Date
- Inmate Name
- Within 14 Days Medical/Mental Health Follow UP
- Date Completed
- Within 60 Days Mental Health Evaluation
- Date Completed

Post audit the facility provided the following narrative:

- The tracking form is now readily accessible to deputies. Upon completing the Risk Assessment Form at intake, if the inmate is marked as a victim or potential victim, staff are required to fill out the new tracking form with the inmate's name and intake date.
- A designated Sergeant will review the tracking form twice a week and will be responsible for notifying mental health of any inmates who need to be seen within the 14-day period to ensure we remain in compliance.
- This new process is now in effect and will be closely monitored to ensure all future cases meet the PREA requirements outlined in Standard 115.81(c).

(a, c) The Clear Creek County Jail PAQ states that all Inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.41 are offered a follow-up meeting with a medical or mental health practitioner.

Policy 902, Prison Rape Elimination Act, page 30, section 902.34 Medical and Mental Health Screenings; History of Sexual Abuse; Information Management Policy states, "To require CCSO to timely address any medical, mental health, or security needs concerning inmates who have experienced or perpetrated prior sexual abuse, either in a confinement setting or in the community. Identifying and offering treatment to inmates with prior victimization is intended to address immediate mental health needs. Identifying and offering a follow-up meeting with a mental health practitioner to prior abusers has the potential to reduce future incidents of sexual abuse and create an improved overall sense of safety within CCSO.

To ensure that CCSO receives information related to sexual victimization or abusiveness that occurred in an institutional setting limits access to those individuals with a need to know and ensures informed consent regarding the release of information about prior sexual victimization in the community. Protecting the confidentiality of inmate information is essential to increase inmate confidence and trust in the system of reporting, investigation, and treatment."

(b) The Clear Creek County Jail PAQ is not applicable as the facility is a jail.

(d) The Clear Creek County Jail PAQ states, Information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners.

Policy 902, Prison Rape Elimination Act, page 30, section 902.34 Medical and Mental Health Screenings; History of Sexual Abuse; Information Management Procedure states, "If the screening indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, CCSO shall 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, whether it occurred in an institutional setting or in the community, CCSO shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within

	<p>14 days of the intake screening.</p> <p>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, 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.</p> <p>Medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting unless the inmate is under the age of 18.”</p> <p>(e) The Clear Creek County Jail PAQ states medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institution setting unless the inmate is under the age of 18. Policy compliance can be found in provision (a) of this standard.”</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Registered Nurse 2. JBBS Clinical Therapist - Contractor <p>Interviews with medical and mental health staff demonstrated each are aware of access to emergency medical and mental health services upon receipt of an</p>

allegation of sexual abuse.

Site Observation:

In the past 12 months the facility has had zero inmates who required emergency services due to an incident of sexual abuse.

(a) The Clear Creek County Jail PAQ states Inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.

Policy 902, Prison Rape Elimination Act, page 31, section 902.35 Inmate Access to Emergency Medical and Mental Health Services Procedure states, "Inmate victims of sexual abuse shall 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, staff first responders shall take preliminary steps to protect the victim and will immediately notify the appropriate medical and mental health practitioners.

Inmate victims of sexual abuse while incarcerated will be 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.

Mental health and medical 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.

	<p>A written Memorandum has been established for outside services for emergency medical and mental health services.”</p> <p>(c) The Clear Creek County Jail PAQ states 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. Policy compliance can be found in provision (a) of this standard.</p> <p>(d) The Clear Creek County Jail PAQ states treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Policy compliance can be found in provision (a) of this standard.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Registered Nurse 2. JBBS Clinical Therapist - Contractor <p>Interviews with medical and mental health staff demonstrated a continuum of medical care and patient evaluation would begin within 24 hours of a sexual abuse incident for both the victim and the perpetrator. The Registered Nurse stated she is</p>

on call 24 hours a day, seven days per week and the Clinical Therapist stated she would prioritize her schedule and come to the facility within 24 hours of learning of a sexual abuse incident.

On Site Observation:

The facility has not experienced the need for emergency medical and or mental health services in the past 12 months.

(a-b) The Clear Creek County Jail PAQ states the facility offers 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.

Policy 902, Prison Rape Elimination Act, page 31-32, section Ongoing Medical and Mental HealthCare for Sexual Abuse Victims and Abusers; Victim Services Policy states, "To ensure that an inmate who has experienced sexual abuse in any confinement setting is offered treatment services.

1. CCSO will offer medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.
2. Treatment of sexual abuse victims will include, follow-up services, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from CCSO.
3. The treatment services will be consistent with the community level of care. Victims of sexually abusive vaginal penetration while at CCSO will be offered pregnancy tests. If pregnancy is detected, victims will receive information about and timely access to all lawful pregnancy- related medical services.
4. Victims of sexual abuse while at CCSO will be offered tests for sexually transmitted infections as medically appropriate.
5. 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. CCSO will attempt to conduct a mental health evaluation for 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."

(d) The Clear Creek County Jail PAQ states female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests. Policy compliance can be

	<p>found in provision (a) of this standard.</p> <p>(e) The Clear Creek County Jail PAQ states If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services. Policy compliance can be found in provision (a) of this standard.</p> <p>(f) The Clear Creek County Jail PAQ states inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. Policy compliance can be found in provision (a) of this standard.</p> <p>(g) The Clear Creek County Jail PAQ states 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. Policy compliance can be found in provision (a) of this standard.</p> <p>(h) The Clear Creek County Jail PAQ states they attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners. Policy compliance can be found in provision (a) of this standard.</p> <p>Through such reviews of medical and mental health personnel completing evaluations within 72 hours or less, the facility exceeds the standard requirements.</p>
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. Clear Creek County Sheriff's Office Sexual Abuse Incident Review (SAIR) Form, not dated

Interviews:

1. Detentions Captain / PREA Coordinator

The interview with the Detention Captain demonstrated the incident review team is comprised of the Detentions Captain, Supervisors, line staff, medical and mental health staff. The team reviews any motivation by race, gender, LGBT; if policy and procedure changes need to be implemented, review of area where the incident took place, and review of the written report. The Detentions Captain stated he oversees sustainable implementation of any recommendations.

Site Observation:

The facility has not had a sexual abuse incident in the past 12 months.

(a) The Clear Creek County Jail PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months there have been zero investigations of alleged sexual abuse.

Policy 902, Prison Rape Elimination Act, page 31, section 902.37 Sexual Abuse Incident Reviews Policy states, "At the conclusion of every sexual abuse investigation, an incident review will be completed to evaluate whether any changes in policy or practice at the facility need to be made. The incident review process is intended to allow the facility to identify systemic problems in policies, practices, dynamics, and physical barriers, staffing levels, and monitoring what may have contributed to an incident or allegation of sexual abuse, so that the facility can improve conditions to avoid future incidents of allegations."

(b) The Clear Creek County Jail PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents was zero.

Policy 902, Prison Rape Elimination Act, page 31, section 902.37 Sexual Abuse Incident Reviews Procedure states, "Within 30 days of the conclusion of the sexual abuse investigation, the PREA Coordinator will conduct a sexual abuse incident

review.

The review team will include upper-level management officials, investigators, and medical or mental health practitioners. The PREA Coordinator and the review team will; consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; consider 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 the program; examine the area of 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; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and prepare a report of its findings.

CCSO will implement the recommendations for improvement or document the reasons for not making changes.”

(c) The Clear Creek County Jail PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners. Policy compliance can be found in provision (b) of this standard.

(d) The Clear Creek County Jail PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA Coordinator. Policy compliance can be found in provision (b) of this standard.

The facility provided a Sexual Abuse Incident Review (SAIR) form documenting the following information.

1. Case Information
2. SAIR Team Members Present
3. Incident Summary
4. Review Discussion
5. Policy or Practice Adjustments

	<ol style="list-style-type: none"> 6. Motivating Factors 7. Physical Layout Concerns 8. Staffing Levels 9. Monitoring Technology 10. Root Cause and Preventative Measures 11. Recommendations and Follow-Up 12. Signatures / Date <p>(e) The Clear Creek County Jail PAQ states, the facility implements recommendations for improvement or documents its reasons for not doing so.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 3. PREA Incident Data Collection Form, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Undersheriff <p>The interview with the Undersheriff demonstrated the agency reviews all incident reports of sexual harassment and sexual abuse, staff and inmates involved in allegations, compile year end reports, and investigations referred for criminal prosecution and look for common trends. The agency focuses on areas to address in the past year and identifies areas recommended for corrective action.</p>

(a) The Clear Creek County Jail PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The PAQ states, "The agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, as outlined in Policy 902.38 - Data Collection. The PREA Coordinator is responsible for maintaining, reviewing, and collecting data from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. This data is aggregated at least annually."

Policy 902, Prison Rape Elimination Act, page 32, section 902.38 Data Collection Policy states, "To ensure that agencies collect uniform data on how many allegations of sexual abuse are made at its facilities, the type of sexual abuse alleged, and how the allegations were resolved. Collecting this data and comparing the data annually can reveal trends or changes in facility sexual safety. The standard envisions sharing of the data annually with the Department of Justice to increase the knowledge of the prevalence of sexual abuse in correctional facilities. Additionally, increasing the available data and information on the incidence of sexual abuse consequently improves the agency and facility management."

The facility provided a PREA Incident Data Collection Form which documents the following information.

1. Case Information
2. Reporting Information
3. Victim Information
4. Alleged Perpetrator Information
5. Nature of Allegation
6. Investigation Information
7. Medical and Mental Health Response
8. Additional Notes and Follow-up
9. PREA Coordinator Review

(b) The Clear Creek County Jail PAQ states the agency aggregates incident-based sexual abuse data at least annually.

Policy 902, Prison Rape Elimination Act, page 33, section 902.38 Data Collection Procedure states, "CCSO will collect accurate, uniform data for every allegation of sexual abuse in the facility. The PREA Coordinator will maintain, review, and collect data as needed from all available incident based documents, including reports, investigation files, and sexual abuse incident reviews. Data collected by site PREA Coordinator shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization conducted by the Department of Justice. The PREA Coordinator will aggregate the incident-based sexual abuse data at least annually. Upon request, CCSO will provide all such data from the previous calendar year to the Department of Justice no later than June 30."

(c) The Clear Creek County Jail PAQ states the standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. Procedure compliance can be found in provision (a) of this standard.

(d) The Clear Creek County Jail PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Policy and procedure compliance can be found in provision (a) of this standard.

(e) The Clear Creek County Jail PAQ states this provision is not applicable as the facility is a jail.

(f) The Clear Creek County Jail PAQ states the Department of Justice has not requested agency data for the previous calendar year.

Through such reviews, the facility meets the standard requirements.

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Clear Creek County Jail PAQ

2. Clear Creek County Sheriff's Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025

3. Clear Creek County Sheriff's Office 2024 PREA Annual Report

Interviews:

1. Detentions Captain / PREA Coordinator
2. Undersheriff / Agency Head

The interview with the PREA Coordinator demonstrated PREA cases are reviewed for the calendar year and questions to the Survey of Sexual Victimization are answered for all applicable facilities. Depending on the data reviewed, corrective action implementation is reviewed during post incident review and facility follow up meetings.

The interview with the Undersheriff demonstrated Quality Assurance and Quality Improvement is learned and implemented from post incident review to include any technical and staffing needs after discussions with facility and agency personnel.

(a) The Clear Creek County Jail PAQ states the agency reviews 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, and training, including:

- Identifying problem areas;
- Taking corrective action on an ongoing basis; and
- Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.

Policy 902, Prison Rape Elimination Act, page 33, section 902.39 Data Review for Corrective Action Policy states, "To ensure that required sexual abuse data is used to identify problem areas, and to take ongoing corrective action to improve the prevention, detection and response policies and practices of the facility and agency.

To require CCSO to prepare an annual report for their facility and for the agency as a whole on the prevalence of sexual abuse and to provide this report to the public through the agency website or other means thus ensuring transparency. Comparing the current year's data with data from prior years and providing an assessment of the agency's progress promotes agency accountability."

The facility provided Clear Creek County Sheriff's Office 2024 PREA Annual Report. The report documents the following information.

- Agency Overview
- Agency Achievements
- Inmate-on-Inmate Allegations
- Staff-on-Inmate Allegations
- External, Third Party-on-Inmate Allegations
- Third Party Reporting Incidents to Clear Creek County

(b) The Clear Creek County Jail PAQ states the annual report includes a comparison of the current year's data and corrective actions to those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse.

Policy 902, Prison Rape Elimination Act, page 33, section 902.39 Data Review for Corrective Action Procedure states, "CCSO will review data collected in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Data reviewed will include the following: identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each program, as well as the organization as a whole.

The report will include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the organization's progress in addressing sexual abuse. CCSO's report shall be approved by the Sheriff (Agency Head,) and made readily available to the public through the website.

CCSO may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a program but must indicate the nature of the material redacted."

(c) The Clear Creek County Jail PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head. The PAQ states, "<https://www.clearcreekcounty.us/1514/Prison-Rape-Elimination-Act>◆◆◆"

	<p>(d) The Clear Creek County Jail PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. The agency indicates the nature of material redacted.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Clear Creek County Jail PAQ 2. Clear Creek County Sheriff’s Office Policy 902, Prison Rape Elimination Act, dated 3.6.2025 <p>(a) The Clear Creek County Jail PAQ states the agency ensures that incident-based and aggregate data are securely retained.</p> <p>Policy 902, Prison Rape Elimination Act, page 33-34, section 902.40 Data Storage, Publication, and Destruction Policy states, “To ensure that sexual abuse data is published appropriately for transparency while ensuring the safe storage of data to protect confidentiality, and to ensure that data is not destroyed prematurely.</p> <p>To inform the public about the levels of sexual abuse experienced by people in confinement and raise awareness of the issue, while also protecting the privacy of inmates who have been sexually abused.”</p> <p>(b) The Clear Creek County Jail PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.</p>

(c-d) The Clear Creek County Jail PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. The agency maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.

Policy 902, Prison Rape Elimination Act, page 33-34, section 902.40 Data Storage, Publication, and Destruction Policy states, “CCSO will ensure that data collected is securely retained for at least 10 years after the date of its initial collection unless Federal, State, or local laws require otherwise. Hard copies of data are secured at the facility in either the Human Resources office or the PREA Coordinator's office.

The electronic data is securely retained with access limited to the PREA Coordinator, and upper-level Administration.

CCSO will make all aggregated sexual abuse data, from programs under its direct control readily available to the public at least annually through its website.

Before making aggregated sexual abuse data publicly available, CCSO will remove all personal identifiers.”

Through such reviews, the facility meets the standard requirements.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>(a) During the prior three-year audit period, the agency was audited once; however, the past auditor did not release the final report.</p> <p>(b) This is the first audit cycle for Clear Creek Sheriff’s Office and the third year of the fourth audit cycle.</p>

	<p>(h) The Auditor was granted complete access to, and the ability to observe, all areas of the facility.</p> <p>(i) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>(m) The Auditor was permitted to conduct private interviews with residents.</p> <p>(n) Residents were permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>(b) The agency has posted the current 2022 PREA audit report on their website.</p> <p>Through such reviews, the facility meets the standard requirements.</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.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	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	na

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

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

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

	facility does not have female inmates.)	
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	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.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the 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.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

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

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

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	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?	no
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.)	yes
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental 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.)	yes
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	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?	no
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate 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).)	yes
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	na
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has 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.)	na
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	na
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	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.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 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.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na

115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	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.)	na
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	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.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by 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