

PREA AUDIT REPORT ☐ Interim ☒ Final
ADULT PRISONS & JAILS

Date of report: July 20, 2018

Auditor Information			
Auditor name: Jennifer L. Feicht			
Address: P.O. Box 308, St. Petersburg, PA 16054			
Email: jfeicht@embarqmail.com			
Telephone number: (724) 679-7280			
Date of facility visit: March 21-22, 2017			
Facility Information			
Facility name: Indiana County Jail			
Facility physical address: 665 Hood School Road, Indiana, PA 15701			
Facility mailing address: <i>(if different from above)</i> Click here to enter text.			
Facility telephone number: (724) 471-7500			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Prison	<input checked="" type="checkbox"/> Jail	
Name of facility's Chief Executive Officer: Samuel Buzzinotti			
Number of staff assigned to the facility in the last 12 months: 80			
Designed facility capacity: 265			
Current population of facility: 160			
Facility security levels/inmate custody levels: Minimum, Medium and Maximum			
Age range of the population: 18 and older			
Name of PREA Compliance Manager: Lori Hamilton		Title: Deputy Warden of Operations	
Email address: lhilton@countyofindiana.org		Telephone number: (724) 461-7502	
Agency Information			
Name of agency: Indiana County Pennsylvania			
Governing authority or parent agency: <i>(if applicable)</i> Indiana County Prison Board			
Physical address: 825 Philadelphia St., Indiana, PA 15701			
Mailing address: <i>(if different from above)</i>			
Telephone number: (724) 465-3805			
Agency Chief Executive Officer			
Name: Samuel Buzzinotti		Title: Warden	
Email address: sbuzzinoti@countyofindiana.org		Telephone number: (724) 461-7501	
Agency-Wide PREA Coordinator			
Name: Lori Hamilton		Title: Deputy Warden of Operations	
Email address: lhilton@countyofindiana.org		Telephone number: (724) 461-7502	

AUDIT FINDINGS

NARRATIVE

The Indiana County Jail contracted with this auditor to conduct the facility's second PREA Audit. The onsite portion of this audit was conducted March 21-22, 2017. This is the first audit this auditor has conducted for the Indiana County Jail.

The audit was scheduled for two days and began the morning of March 21, 2017. The morning began by meeting with staff members to discuss the course of the audit and for this auditor to answer questions.

After the initial meeting, the facility tour took place. The auditor viewed all areas of the facility where inmates have access to. The auditor viewed each housing unit, central control, food service area, medical/mental health department, booking area, records department, laundry, maintenance, warehouse, and administrative area.

Once the facility tour concluded in the morning, the interviews with staff and inmates continued. The auditor conducted interviews with the following staff member classifications:

- Warden
- PREA Coordinator
- Contracted Medical Services Director
- Mental Health Staff
- Intake Staff
- Security Staff (responsible for conducting investigations)
- Human Resources Director
- Volunteer

There were twelve staff interviews conducted including random staff chosen by the auditor.

There were thirteen interviews conducted with inmates in the facility. Inmates were chosen on a random basis. The PREA Coordinator provided the auditor with lists of inmates organized by housing unit. The auditor randomly identified inmates from each housing unit and the staff arranged for those inmates to be available for the required interviews.

The Indiana County Jail houses male and female individuals from Indiana County, as well as holding inmates through a contract with the Franklin County Jail, holds temporary parole violators (TPV's) through a contract with the PA Department of Corrections and has a contract with the U.S. Marshal Service. The female population is the fastest growing population for (ICJ).

The facility does not house individuals under the age of 18, but rather contracts out to other PREA compliant facilities for their housing and care.

The facility is American Corrections Association (ACA) accredited, as well as National Commission on Correctional Health Care (NCCHC) accredited.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Indiana County Jail (ICJ) sits at 665 Hood School Road, Indiana, PA 15701. This facility has a bed capacity of 265 and houses both male and female individuals.

The facility has an intake area for processing new receptions, six housing units, a medical department, administration area, visitation area, and facility operations areas.

The (ICJ) provides educational and work opportunities to inmates of the facility. In addition, there is a mental health practitioner that provides services to inmates at the facility.

SUMMARY OF AUDIT FINDINGS

The Indiana County Jail has done a commendable job maintaining compliance with PREA standards. The Administration of the facility has embraced PREA and that has been disseminated down through the ranks of the staff. The facility was prepared for this audit and was very helpful and accommodating to this auditor throughout the audit process.

Number of standards exceeded: 2

Number of standards met: 41

Number of standards not met: 0

Standard 115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

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

The Indiana County Jail has a Zero Tolerance Policy of Sexual Abuse and Sexual Harassment. This statement is made know to staff, contractors, volunteers and inmates who enter the jail. The Zero Tolerance Policy reads as follows:

"The Indiana County Jail prohibits any form of sexual harassment or sexual contact with an inmate. Anyone who engages in, fails to report, or knowingly condones sexual harassment or sexual contact with an inmate shall be subject to disciplinary action and may be subject to criminal prosecution. An inmate, employee, contractor, visitor, volunteer and any individual who has business with or uses the resources of the Indiana County Jail is subject to disciplinary action and/or sanctions, including possible dismissal and termination of contracts and/or services, if found to have engaged in sexual harassment or sexual contact with an inmate. A claim of consent will not be accepted as an affirmative defense for engaging in sexual harassment or sexual contact with an inmate. An inmate who reports sexual harassment or sexual contact, or a staff member who reports sexual harassment or sexual contact with an inmate will be protected from retaliation."

The (ICJ) has dedicated resources to implementing and maintaining PREA compliance. In order to ensure the continuing compliance, a PREA Coordinator has been identified for the facility. The Deputy Warden of Operations has been designated as the PREA Coordinator.

"The Deputy Warden of Operations is designated as the Indiana County Jail PREA Coordinator. The Deputy Warden of Operations will develop, implement and oversee the Indiana County Jail PREA Policy and investigative process. In addition, the Deputy Warden of Operations will maintain all documentation in regards to PREA investigation and organize any meetings and interviews in relation to PREA and PREA investigations."

The Indiana County Jail operates one facility located in Indiana County, Pennsylvania.

Standard 115.12 Contracting with other entities for the confinement of inmates

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

As of the date of this audit (March 21-22, 2017), the (ICJ) has entered into four separate contracts for housing youthful inmates under the age of 18. Currently, the only contracts that (ICJ) have are to house youthful inmates. Each of these contracts has been reviewed by the Auditor and found to be acceptable.

The first of the contracts is between (ICJ) and Cambria County Prison (CCP). Cambria County agrees to hold youthful offenders between the ages of 15 and 18. There are stipulations and/or reasons that (CCP) would not accept an inmate outlined in the agreement. The agreement states that (CCP) is currently PREA compliance and will remain compliant through the entirety of the contract. The day before the audit (CCP) notified (ICJ) that the youthful offender being held there would have to be transferred back to (ICJ) as there was an overcrowding issue. (ICJ) was able to make arrangements with the Westmoreland County Juvenile Detention Center and Youth Shelter.

Westmoreland County Juvenile Detention Center and Youth Shelter is the second contract (ICJ) has to house youthful inmates. This contract indicates that the Westmoreland County Juvenile Detention Center and Youth Shelter will house the youthful offenders for (ICJ) in accordance with all applicable PREA standards.

The third contract is with the Cornell Abraxas Group, Inc. This contract also indicates that group will provide housing for the youthful offenders that will meet applicable PREA standards.

And lastly, the fourth contract for housing youthful offenders is with the York County Prison (YCP). This contract was for a limited amount of time ending on May 31, 2017. It does state that (YCP) will house these youthful offenders in compliance with all applicable PREA standards.

For each of these sites, the PREA Coordinator (Dep. Warden) and the Warden go to the facility to tour. This gives them a personal view of the facility and they can observe whether PREA is being followed at that facility. While on the tour of the facility, the pair also ask questions of the inmates to see if they are able to answer the questions regarding PREA. Prior to the onsite visit, the PREA Coordinator will pull the facility's most recent PREA Audit Report to ensure that the facility is indeed PREA compliant. This practice is not required under PREA standards; however, it provides valuable information to make the best decisions for one of the most vulnerable populations.

Standard 115.13 Supervision and monitoring

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

The (ICJ) has created a facility staffing plan which was developed in accordance with the "Staffing Requirements 100.43". The Staffing Requirements Policy indicates that:

"It is the policy of the Indiana County Jail (ICJ) to conduct an annual review of staffing requirements to determine the number of staff required to maintain care, custody and control on a 24-hour basis, an initial staffing analysis conducted and reviewed annually."

The policy goes on to indicate the number of staff that are required for each area of the facility and the relief factor that is used for the staffing plan. The creation of the staffing plan includes elements required under this standard.

In addition to policy 100.43, (ICJ) has included a statement in the PREA policy 100.29, which indicates that if there is a deviation from the staffing plan, it requires the pre-approval of the Warden.

(ICJ) conducts the required unannounced rounds of the facility as required by standard. Additionally, the facility has developed a form which is completed each time one of these rounds are completed. The Auditor reviewed multiple forms documenting the conduct of these rounds. The PREA policy in relation to unannounced rounds reads as follows:

"Administrative staff will conduct unannounced rounds/walk-thru for all shifts. These rounds will be documented in the Post Log Books and form 100.29-1 PREA Administration Walk-thru/Inspection. This form will indicate area visited and information regarding inspection/visit. These forms will be maintained in the administrative area to protect confidentiality."

It is clear that the facility understands and implements all required items under this particular standard. It is the opinion of this auditor that the facility goes above the requirements of the standard by requiring that the unannounced rounds are documented on a separate form and has a place to document any necessary information regarding the PREA unannounced round.

Standard 115.14 Youthful inmates

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

The (ICJ) holds contracts three facilities to house youthful inmates. When there is a youthful inmate that is presented to the jail, the staff make calls to the three contracted facilities to determine where the youthful inmate can be placed. This information is also outlined in the Prison Rape Elimination Act (PREA) policy, 100.29.1.

Standard 115.15 Limits to cross-gender viewing and searches

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

(ICJ) has put into place a number of policies that address cross-gender viewing and searches and working with transgender or intersex individuals.

During the onsite audit, it was noted in the Intake Area that there were a couple of cells in which the toilet area was visible to anyone. This would not have provided privacy for anyone while performing bodily functions as required by standard. In order to correct this issue, the staff immediately began to seek solutions. By the end of the onsite audit, the staff had a plan for covering portions of the windows with a grey out film in order to provide privacy. This was completed quickly and photos of the cells were set to this Auditor on April 6, 2017. This correction was accepted as compliant.

While reviewing the video monitoring system of the facility in central control, staff pointed out the blacked-out area in several of the camera views. This is due to the camera being pointed towards a toilet or other area where an inmate may be viewed unclothed. There are less than five camera views in the system that needed to have the blackout applied. This enables both genders to man the central control post for the facility.

The facility does not conduct cross gender strip searches or cross gender visual body cavity searches. If a female enters the booking area to be processed, and there is no female staff working in the booking area on that shift, then the booking officer will call to the female housing unit to have a female officer go to booking to do the searches required. If, however, the situation would become an emergency, the male officers have permission to conduct the search. When that is done, there is a form, PREA Cross Gender Unclothed Search Approval, that must be completed as soon as possible. In order to avoid those situations, (ICJ) schedules a minimum of two female staff members on each shift. This is the same situation for pat down searches as well.

As there are always female staff on the shift, out of cell activities are not limited due to not having the appropriate staff member to conduct the required searches.

While conducting the onsite tour of the facility, it was clear that all staff are aware and perform the duty of making the cross-gender announcements as required. These announcements are made by the block officer when the individual is still in the sallyport waiting to enter the housing unit.

The (ICJ) does not receive many individuals that identify as transgender or intersex. Although staff can remember a couple that have been at the facility over the past few years. When interviewing staff members, especially those working intake, they were very clear that the course of action that they take with transgender individuals is to treat that person the same as any other individual that enters the facility, with respect.

If a new inmate is identified as transgender or intersex, the administrative team has a process established to determine what the best placement for the individual would be. There has been forms developed for the six-month review of the individual, should they still be at the (ICJ).

Standard 115.16 Inmates with disabilities and inmates who are limited English proficient

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

The (ICJ) implements a number of methods of relaying PREA information to inmates who have disabilities or those that are Limited English Proficient (LEP).

For individuals who are deaf or hard of hearing and can read sign language, the facility will employ the resources of Indiana University of Pennsylvania (IUP) to provide sign language interpreters for the inmates. If the individual is blind, then a staff member, preferably the counselor, will sit down one to one with the inmate and provide the PREA orientation information. This is also the same for those individuals that are developmentally disabled. The counselor will provide a one to one session with that individual.

For those inmates that are (LEP), bilingual staff will be utilized if there are any that speak that particular language. The PREA Coordinator maintains a list of staff that can speak additional languages. If there are no staff that speak that additional language, then the facility will employ the services of a translation service.

The use of inmate interpreters is strictly limited to those situations which may include a delay in the investigation to wait for another interpreter; inmate safety concerns and first responder performance.

All of these items are articulated in the "Prison Rape Elimination Act (PREA)" policy, number 100.29.1 on page 6, number 2.

Standard 115.17 Hiring and promotion decisions

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

The facility has incorporated PREA standards into both the hiring and promotion process for (ICJ).

The promotion process is outlined in Staff Promotions (100.06) policy. The requirements of PREA are explained under the Procedure section, number 4. The policy reads as follows:

"The (ICJ) will follow the PREA standards when considering an employee for promotion and will strictly prohibit promoting anyone who may have contact with inmates and who has engaged in sexual abuse in prison, jail, lockup, community confinement facility, juvenile facility, or other institution or 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 if they have been civilly or administratively adjudicated to have engaged in this activity. The (ICJ) will require consideration of any incidents of sexual harassment in determining whether to promote anyone or to enlist in the services of any contractor, who may have contact with the inmates.

The (ICJ) recognizes that the material omission regarding above stated misconduct or the provision of materially false information, shall be grounds for termination."

Interviews with the Warden and PREA Coordinator indicated that, over the course of the last twelve months, there has not been any promotions in which sexual harassment was an issue.

The jail also has a Hiring and Training New Employees (100.01) policy which addresses criminal background checks. These are conducted yearly on all employees, contractors and volunteers at the facility. The Deputy Warden runs the background checks on the volunteers separately than the ones run on the staff and volunteers.

When the jail is hiring new employees, the process for interviewing and testing is lengthy and with multiple parts. If the applicant receives an interview, any former correctional employers will be contacted at that time to ask the required questions. The facility has the applicant complete a form, ICJ Authorization to Obtain Information/Waiver, granting the other facility permission to release information. This is then sent to the other facility with the form containing the required questions.

Interviews with the PREA Coordinator, Warden and HR Director/Assistant Chief Clerk indicated that they have done little hiring for corrections over the past couple of years and of those hires, there have been very few that have worked at another corrections facility prior to applying at (ICJ).

Standard 115.18 Upgrades to facilities and technologies

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

During this audit period, it has been determined that there have been no upgrades to the facility itself or technology in the facility. During the pre- and on-site audit, review of the PREA policy for (ICJ) showed that there was no information included to direct staff on what steps to take in the event there is an upgrade to either the facility or technologies or both.

This information is now included and the interviews with the PREA Coordinator and the Warden of the facility clearly verified that the upgrades to the facility and technologies used in the facility always include consideration to PREA related issues.

Standard 115.21 Evidence protocol and forensic medical examinations

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

The (ICJ) works collaboratively with Pennsylvania State Police (PSP) to complete both the administrative and criminal (if applicable) investigations. If the PREA Coordinator determines that (PSP) should be notified of a situation, the staff are to cordon off the area where the alleged abuse occurred and wait for (PSP) to arrive.

If the situation is determined not to be of a criminal nature, the staff will refer to the policy which outlines the steps that are to be taken for the administrative investigation. This information can be found in Prison Rape Elimination Act (PREA) 100.29.

The facility does not conduct forensic medical exams. If an inmate requires a forensic medical examination, they are transported to Indiana Regional Medical Center (IRMC). The hospital employees Sexual Assault Forensic Examiners (SAFE's) who will perform this examination.

(ICJ) has entered into a Memorandum of Understanding (MOU) with the Alice Paul House (APH). (APH) is the sexual and domestic violence crisis center that serves all of Indiana County. They meet all the standards set in place by the Pennsylvania Coalition Against Rape (PCAR). These standards govern the work of rape crisis centers across Pennsylvania. To ensure (APH) is in compliance with those mandated standards, the agency goes through a monitoring process every three years by (PCAR). (APH) has agreed to provide services to victims of abuse in a confinement setting at the (ICJ). They will accompany the victim through the forensic examination process if the victim requests such assistance. In addition, the advocates will provide follow up services as necessary and requested by the victim. The facility and the agency have a very good working relationship with each other.

While the facility itself will conduct the administrative investigation, they do not conduct any part of the criminal investigation. If there is a need for a criminal investigation to be conducted, (ICJ) will call the (PSP), Indiana barracks. Through interviews with staff, the (PSP) and (ICJ) have a very good working relationship. If the PREA Coordinator directs for (PSP) to be called, they will respond to the facility, or hospital, if necessary.

Standard 115.22 Policies to ensure referrals of allegations for investigations

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

The five Sergeants, two Deputy Wardens and the Warden are all trained to conduct sexual abuse investigations at (ICJ). In addition, when there is a report of sexual abuse or sexual harassment made, the staff member who receives the allegation is responsible for completing an incident report as soon as they are able after the information is received. They are also responsible for immediately notifying the Sergeant on duty at that time. The Sergeant on duty will then contact the PREA Coordinator. All of these steps are then documented in a written format.

Once the PREA Coordinator receives the information, she will then determine whether the call should be made to (PSP) or if it does not rise to the level of criminal charges. In all sexual abuse cases, the (PSP) are called.

Standard 115.31 Employee training

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

The facility provided the power point presentation for review, which they use for staff members. All required topics were covered in the presentation. PREA is also covered each year at the annual training that the facility provides for all staff members.

New staff members are provided PREA training during their orientation before they are able to work a post position unsupervised. This training is conducted by the PREA Coordinator or specially trained staff and will be completed no later than two weeks from the probationary period start date.

All staff members sign a verification form that indicates that they not only received the training, but they also understood the training. These verification forms are kept in the administration area and maintained by the administrative assistant for the facility.

Interviews with random staff members made it clear that the staff of the facility have had PREA training and have retained the information that was provided during that training.

Standard 115.32 Volunteer and contractor training

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

During the onsite audit, an interview was conducted with one of the religious volunteers that come in weekly to the facility to provide one to one guidance. There are two volunteers that come in on Thursday evenings and they split the housing units. When they go to the housing units, they will ask if there is anyone that would like to talk with them. Each of these volunteers average 3 to 4 meetings per night.

During the interview process, the volunteer indicated that he did have PREA training last year. It lasted for a couple of hours and covered a large amount of material on the subject. This was also verified by seeing the "Volunteer and Contractor Training Record" form 100.29-7 for this individual.

The facility's policy is specific as to the amount of training that volunteers and contractors must have based on the amount of contact they have with the inmates. The stipulations in the policy are as follows:

"The level of training will be based on the amount of time the volunteer or contractor spends in contact with the inmates. If the volunteer/contractor has medium/minimal contact, a training sheet on the zero-tolerance policy, appropriate conduct and reporting responsibilities will be provided with an acknowledgement signature by the volunteer and contractor as well as the PREA Coordinator. This acknowledgement will be kept on file for a period of twenty-four months where after a new training will be conducted with a new acknowledgement obtained. These volunteers and contractors will be escorted throughout the building with PREA trained staff.

If the volunteer/contractor has regular contact with the inmate population, they will be required receive training by the PREA Coordinator or designee on PREA 100.29 policy and will sign off on an acknowledgement form along with the PREA Coordinator. This acknowledgement will remain on file for a period of twelve months when a new acknowledgement form will be required."

Review of materials on-site demonstrated documentation of volunteer training conducted by the facility.

Standard 115.33 Inmate education

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

Inmates arriving at (ICJ) receive information in multiple forms. The intake area has a "PREA Binder" on it which the booking officer goes through with each new intake. This orientation includes information about the zero-tolerance policy and instructions on how to make a PREA complaint. This process usually occurs within the first couple of hours that the individual arrives at the facility.

In addition to this initial orientation, the inmate will receive additional information regarding PREA when they arrive at the housing unit. They will receive information both in writing and through video. The inmate will receive an inmate handbook, which includes PREA information. Every housing has a PREA Binder that is kept at the officer's desk. Also, every inmate will see a power point presentation in the law library. This will typically occur within the first week the inmate has been incarcerated. Once this power point has been viewed, the counselor will document the inmate's participation in the counselor's individual inmate treatment file.

If the inmate remains at the (ICJ) for a period of one year, the inmate will be required to participate in the power point presentation again.

Finally, the inmates must use a kiosk system to place commissary orders, file grievances, send emails, etc. The kiosks are now programed with PREA information that shows the first time the inmate logs into the kiosk system. The inmate must acknowledge the information before they can use any of the features on the kiosk.

Standard 115.34 Specialized training: Investigations

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

In the facility, (ICJ) has trained a number of people that are available to conduct administrative investigations. Currently, the facility has trained all five Sergeants, both Deputy Wardens and the Warden. These trainings were either taken at the PA Department of Corrections training academy in Elizabethtown, PA, or at (ICJ). The training at (ICJ) was sponsored by the PA Prison Wardens Association (PPWA) and hosted by (ICJ).

Both training syllabuses for both trainings were reviewed and found to include all required elements of 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.

Standard 115.35 Specialized training: Medical and mental health care

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

The contracted staff members from Prime Care Medical (PCM) receive multiple trainings regarding PREA. The staff members in the medical and mental health departments attend (ICJ)'s yearly training on PREA, with the exception of the contracted physician and psychiatrist. In addition to the yearly training, each of these individuals is required to have an orientation training through (PCM) that includes PREA training and yearly training through (PCM).

Each individual in the department is also required to complete that online training provided by the National Institute of Corrections (NIC) entitled "*PREA: Medical Health Care for Sexual Assault Victims in a Confinement Setting*". This online training is required to be completed within 60 days of their hire date. At the completion of the course, the contracted staff member will print out a certificate of completion to be maintained in their training file.

In reviewing the certificates for the contracted medical staff, it was determined, by comparing the staff roster with the certificates, all of the medical and mental health have completed the training.

Standard 115.41 Screening for risk of victimization and abusiveness

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

Through review of the pre-audit information and the information collected onsite, it was noted that a couple minor changes would need to occur with the PREA risk assessment.

The facility completes the required initial screening in two phases. The first phase is that the booking officer will ask several of the PREA required questions during the intake process. Then the inmate will talk to a counselor, who will then ask the rest of the required risk assessment questions.

The version of the "PREA Counselor Assessment" had a couple of questions that needed to be changed in order to be in compliance with PREA Standard 115.41. While the form asked if the inmate had committed sex offenses in the past, it did not inquire if those offenses were against an adult or a child.

And finally, the form asked what the counselor's perception was in regard to gender non-conforming, but did not inquire as to the perception about any LGBTI designation.

These issues with the PREA Counselor Assessment form were identified on the first day of the onsite audit. These items were all changed and corrected by the second day of the onsite audit. Additionally, a line was added so that the release date could be notated on the form. This will allow for the determination of whether there should be a 30-day risk assessment conducted or if that inmate was released prior to that timeframe.

There are two counselors at (ICJ) that are responsible for conducting a portion of the 72-hour PREA risk assessment and the 30-day risk assessment. There has been a spreadsheet that is developed that tells them on a weekly basis which inmates need to have the 30-day assessment conducted. This is an excellent tool for the counselors to keep on track with the required assessments.

The PREA Counselor Assessment forms are kept in orange files with very limited staff access. The only staff which have access to these orange files are the counselors, PREA Coordinator, Deputy Warden and Warden.

Standard 115.42 Use of screening information

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

While interviewing random staff members, it is clear that staff have had effective training regarding the LGBTI population. In addition, review of the policy indicates that the facility is working to place transgender, intersex, or gender non-conforming inmates in accordance with PREA standards. The policy reads as follows:

"The Indiana County Jail Administration will review on a case-by-case basis housing placement of LGBTI/Gender Non-Conforming inmates ensuring health and safety. Management and security will be given serious consideration in addition to the LGBTI/Gender Non-Conforming inmate's own views regarding his/her safety. Review of housing status will take place every six months."

(ICJ) has a form developed to document all meetings regarding the placement of any transgender or intersex inmate at the facility. This is for both the initial documentation and the documentation for the six-month review.

Standard 115.43 Protective custody

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

Protective custody is used very sparingly at (ICJ). Through interviews with the Warden and PREA Coordinator, it is clear that protective custody is used only in rare circumstances. During the preceding twelve months, the facility indicated that there were no inmates placed in involuntary protective custody. If there is someone placed in protective custody, there is a form that must be completed. The policy outlines what process must be utilized when someone is placed in involuntary protective custody. The policy reads as follows:

"Inmates who are at a high risk of sexual victimization shall not be segregated involuntarily unless there are no available housing areas to separate them from possible abusers. The Sergeant will complete the assessment within 24 hours and will note other housing alternatives and reasons why they were not an option. If the (ICJ) segregates for this purpose, the inmate will have access to programs, privileges and work opportunities. Review of those inmates in PC will be scheduled by the counselors and will not exceed 30 days. If the inmate is returned to PC, another review will be scheduled not to exceed 30 days and every 30 days thereafter. Clear documentation using form 100.29-10 PREA Protective Custody will be made regarding the concerns for the inmate's safety and the reason why alternative separate was not feasible. This form will be kept in the administration area to maintain confidentiality."

Standard 115.51 Inmate reporting

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

The (ICJ) provides multiple methods which inmates may use to make a report of sexual abuse or sexual harassment. These internal mechanisms are outlined in the PREA policy 100.29. It reads as follows:

"Offenders incarcerated in the Indiana County Jail may report any act of sexual assault/rape or sexual harassment in writing or verbally to any Indiana County Jail staff member, contractor, visitor, or volunteer. Once it is reported, the staff member, contractor, visitor, or volunteer will immediately report it to their supervisor. If the supervisor is not a direct staff member of the Indiana County Jail, they will immediately notify the Sergeant on duty. The Sergeant on duty will immediately notify administration, who will notify the PREA Coordinator, the coordinated investigation process will then begin."

In an effort to provide a third-party reporting source to allow an inmate, general public, private entity or office that is not part of the Indiana County Jail, the ability to complete a private complaint, the Indiana County Jail has partnered with the Pennsylvania Department of Corrections (Intergovernmental Agreement of file). The PA DOC has provided a private PREA reporting phone number (1-866-823-6703) which can be contacted 24 hours a day 7 days a week. Upon contact at this number, pertinent information will be obtained by the DOC and then immediately sent to the Indiana County Jail via email to Administrative Staff and Sergeants and via phone contact at 724-471-7507 with the Sergeants (who will immediately notify Administration). The private email address is designated as Indianacountyjail@gmail.com and can only be reviewed by Administration and Sergeants. The third-party reporting phone number will be given to all inmates in the offender orientation process and will be posted for the public and private entities via memo in lobby and on the county website. Posters containing reporting information will be posted in all housing units as well as general public and staff areas of the Indiana County Jail.

The inmate population will be able to use any "blue phone" in the jail using prompt #4 to be connected directly to SCI Camp Hill to give a complaint."

The tour of the facility and review of the website verified that these mechanisms are provided as described in this policy.

Interviews with inmates at (ICJ) also confirmed that they know how to make a report and if these reports are able to be anonymous.

Staff also have a mechanism established to report sexual abuse or sexual harassment at the facility. These reporting options are outlined in the PREA policy 100.29. It reads as follows:

"Staff members, contracted employees, and volunteers who receive any information, regardless of its source, concerning sexual abuse or sexual harassment, are required to immediately report the information or incident directly to the appropriate supervisor through the chain of command either verbally, in writing (use confidential report form 100.22) or via phone conversation. If the person in question is the immediate supervisor, staff will report the information to their supervisor's next immediate supervisor. If the highest level of supervisor at the (ICJ) is the person of concern or if the reporting staff member is not comfortable reporting their concerns in-house, staff shall report their concerns directly to the HR Department for Indiana County located at the Indiana County Courthouse, Commissioner's Office or call 724-465-3804. All information is confidential."

Interviews with random staff members showed that staff are clear about how to make a report regarding sexual abuse or sexual harassment.

Standard 115.52 Exhaustion of administrative remedies

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

The Indiana County Jail has established an extensive process for the filing of grievances regarding sexual abuse. There are no time limits put on filing a grievance regarding sexual abuse within the facility.

Upon review of the PREA policy 100.29, Indiana County Jail has worked hard to incorporate the multitude of provisions listed in the training for staff members.

During interviews with staff, it was clear at the PREA Coordinator and Warden are clear about the process. And the review of the written policy, all items from the standard are incorporated into this section.

Through interviews with staff members, there was no indication that any inmate has submitted a grievance related to sexual abuse.

Standard 115.53 Inmate access to outside confidential support services

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

The Indiana County Jail provides access to outside confidential support services through a (MOU) with the Alice Paul House, the certified rape crisis center for Indiana County. In addition to the information on the Alice Paul House, the facility has provided information to a number of other resources that may provide support services to the victim in a sexual abuse situation.

The (MOU) outlines the scope of services that Alice Paul House will be providing and the method of delivery of those services.

Standard 115.54 Third-party reporting

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

As reported under the Inmate Reporting standard, (ICJ) has clearly demonstrated that they are in compliance with this standard. The PREA policy 100.29, regarding third party reporting is outlined below.

"In an effort to provide a third-party reporting source to allow an inmate, general public, private entity or office that is not part of the Indiana County Jail, the ability to complete a private complaint, the Indiana County Jail has partnered with the Pennsylvania Department of Corrections (Intergovernmental Agreement of file). The PA DOC has provided a private PREA reporting phone number (1-866-823-6703) which can be contacted 24 hours a day 7 days a week. Upon contact at this number, pertinent information will be obtained by the DOC and then immediately sent to the Indiana County Jail via email to Administrative Staff and Sergeants and via phone contact at 724-471-7507 with the Sergeants (who will immediately notify Administration). The private email address is designated as Indianacountyjail@gmail.com and can only be reviewed by Administration and Sergeants. The third-party reporting phone number will be given to all inmates in the offender orientation process and will be posted for the public and private entities via memo in lobby and on the county website. Posters containing reporting information will be posted in all housing units as well as general public and staff areas of the Indiana County Jail."

During the facility tour, it was observed that all housing units had phone and signage describing how to make the call to the PA Department of Corrections. Reporting information is also available on the jail's website.

Standard 115.61 Staff and agency reporting duties

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

The Indiana County Jail requires all staff, contractors and volunteers to report any suspicion or actual disclosure. This requirement is reflected more than once in the PREA policy 100.29.

Random staff interviews also provided information that they are required to immediately report any suspicions or actual disclosures to the PREA Coordinator.

Standard 115.62 Agency protection duties

- ☐ Exceeds Standard (substantially exceeds requirement of standard)

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

It has always been the policy and procedure of the Indiana County Jail to ensure the safety of all inmates. This concept is mentioned throughout the PREA policy.

Interviews with staff members indicated that there would be a discussion in regard to each specific situation and the determination of where to place the individual is made on a case-by-case basis.

Standard 115.63 Reporting to other confinement facilities

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

An interview with the Warden indicated clear understanding of the particulars of reporting to another confinement facility. The Warden did also indicate that there have been very few disclosures at (ICJ) which would require a report to another facility.

In addition, the PREA policy 100.29, clearly outlines the process and procedure that should be utilized when a report about another facility is made.

"If an inmate at the (ICJ) makes an allegation that they were sexually abused/assaulted while committed/house in another correctional facility, the Warden, PREA Coordinator or DW of Facility Services in the Warden's absence will notify the Warden/Superintendent/Sheriff via phone call of the facility in question or appropriate office of the agency where the alleged abuse/assault occurred and they shall also notify the appropriate investigative authority (State Police, County Detective, District Attorney, DOC Central Office, Municipal Police, etc.) via phone call. This notification will occur no later than 72 hours after receiving the information and will be documented on the (ICJ) For PREA 100.29-6, Report Other Confinement Facilities. In addition, a hard copy will follow either via postal service or email service with delivery and read receipt attached.

If the (ICJ) receives same notification from another facility, Administration and PREA Coordinator will be immediately notified by the Sergeant and a PREA investigation will begin following policy."

Standard 115.64 Staff first responder duties

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

The first item to note regarding first responder duties is that during interviews, all staff were well versed in the steps that must be taken when sexual abuse is reported. In addition, policy reviewed also showed well thought out

processes for handling a report. The PREA policy 100.29 articulates the steps that should be taken for both the first responder and Sergeant on duty at the time.

The first responder shall take steps to separate the victim and abuser, secure the scene, notify the appropriate staff member in charge at the time, how to treat a victim and other items to consider. It reads as follows:

"First Responder to Abuse/Assault in Progress (Real Time Incident)"

- *The first responder will verbally order the actor or actors to stop immediately keeping in mind they will not physically intervene until additional staff has arrived.*
- *Call the appropriate response code for Sergeant/staff/medical personnel to arrive.*
- *Be aware of those involved in the incident. Advise Sergeant who the victim/victims are so they may be removed from the scene. Protection may need to be offered.*
- *Remember this area will be a crime scene, approach with caution and note if there may be a secondary scene.*
- *Identify potential evidence and avoid contact with such evidence.*
- *Show empathy for the victim/victims. You will need to encourage them not to bathe or destroy any potential evidence.*
- *Do not re-victimize. Words are powerful, it is not appropriate to blame the inmate for what has happened.*
- *Remember victims of sexual assault react in different manners. Look for signs of depression, anger, acting out/aggression, self-blame, report anything that does not seem right.*
- *Remain alert and attentive, the area will be a crime scene until you are told otherwise.*
- *You will prepare a detailed report for the Sergeant, Administration and Investigator in Charge. Do not leave out any important information. Remember to include witness statements and comments.*

Supervisor on the Scene (Sergeant)

- *The Sergeant will, after victim(s) are secure, begin process of notification to Administration, PREA Coordinator, (PSP), Alice Paul House, Medical Department and (IRMC) so the investigative process can begin.*
- *The Sergeant will notify the medical department to approach scene and provide any necessary medical assistance while maintaining evidence and crime scene perimeter. The Sergeant will also notify medical supervisor after hours regarding the incident and if necessary, request assistance.*
- *The Sergeant will follow protocol for a facility lock-down. The Sergeant will announce if there are any changes to the facility lock-down such as all areas unlocked, or only certain areas are unlocked.*
- *The Sergeant will identify and separate the victim/victims from the perpetrator or perpetrators. The Sergeant will assign housing status for all those involved. The Sergeant will be responsible for securing the crime scene perimeter and will make the determination of facility needs.*
 - *Did the incident take place in a high traffic area*
 - *If the area is hostile, they will determine what special precautions must be implemented.*
 - *Decide what, if any, changes need to be made operationally.*
 - *The Sergeant will secure any time sensitive evidence such as DVR video recordings.*
 - *The Sergeant will make sure that all incident reports are compiled, completed and contain all pertinent information prior to giving to Administration and Investigators.*
 - *The Sergeant will gather all information related to incident such as movement logs, headcount, sheets, etc.*
 - *The Sergeant will notify the Alice Paul House for victim advocacy and counseling. The Alice Paul House for victim advocacy and counseling. The Alice Paul House is a local victim advocate services service that employs trained counselors in assault/rape for both male and female victims. They are available 24 hours a day 7 days a week at 724-349-4444. They will provide emotional support services relating to sexual abuse/rape for the (ICJ) inmate population.*
 - *All contact with the Alice Paul House will be arranged via phone conversation in a confidential manner by jail PREA Coordinator, administrative staff, and jail counselors. Record of arrangements will be completed on (ICJ) for 100.29-3 PREA Alice Paul House Contact Information Form. These forms will be maintained in the administrative area for confidentiality purposes.*
 - *If the victim is under 18 years of age or considered a vulnerable adult, the PREA Coordinator will report to the PA State Police/Indiana Barracks via phone record of the report on form*

100.29-4 PREA Mandatory Report Record of Victims Under the Age of 18 and Vulnerable Adults. All reports will be kept confidential and maintained in the administrative area.

All staff is reminded that not every PREA violation will be observed or reported during a real-time incident. An inmate can report a PREA violation at any time even several days after an incident. If you receive PREA information at any time, you will report this immediately to your direct supervisor."

Standard 115.65 Coordinated response

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

The PREA policy for the Indiana County Jail is very clear and specific regarding the steps that should be taken in the event that there would be a PREA allegation made. Staff were able to answer questions easily about with the process is when there is a PREA allegation made.

During staff interviews, staff were able to articulate this process during the interviews with the auditor. Specialized staff (medical, mental health, security, administration) were able to discuss what the specific function of their department is during such incidents.

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

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

The (ICP) has had a union representing corrections officers for many years. Beginning January 1, 2017, a new union was chosen to represent the staff members at (ICP). The United Mine Workers of America (UMWA), Local 4702, is the new union representing all corrections officers, one individual from the maintenance department and those individuals in the records department. The term of this contract is January 1, 2017 to and including December 31, 2019.

As required by the PREA standards, Article 15 Management Rights, provides managerial responsibilities *"....which shall include but are not limited to.....to reprimand, suspend, discharge for just cause or otherwise relieve employees from duty for lack of work or other legitimate reasons;"*.

Standard 115.67 Agency protection against retaliation

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

The Indiana County Jail has established a system to provide the required 90-day monitoring system for the victim and reporter and anyone else that was a part of the investigation as a witness. As mentioned before in this report, there has not been any cases over the last twelve months that would warrant the monitoring process to be activated.

The PREA policy has a section that specifically discusses this retaliation standard as follows:

"The Indiana County Jail will strictly enforce protection from retaliation for both inmates and staff that report sexual abuse/sexual harassment or those that cooperate with sexual abuse and sexual harassment investigations. The Sergeant will be designated as the staff member who will monitor retaliation. If they find or suspect that retaliation has occurred, they will verbally notify administration and complete a written form.

Administration will handle disciplinary action on those that are found to have violated this section of the policy."

Standard 115.68 Post-allegation protective custody

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

The information that is contained within the policy for 115.43 applies as well to this standard. Please see notes on 115.43.

Standard 115.71 Criminal and administrative agency investigations

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

The facility staff members of the full time Sergeants, both Deputy Wardens and the Warden have all received the required training for conducting the administrative investigations at (ICJ).

Staff members have reported that there have been very few disclosures of sexual abuse that have occurred at (ICJ). The investigation files for the preceding twelve months were reviewed. There were four investigations conducted and all were sexual harassment cases.

The review of the files showed that the appropriate information is contained and consistent throughout the files. Review of documentation showed the investigations were conducted promptly, thoroughly and objectively.

Review of the policy shows that the appropriate information is contained to direct staff when they have questions regarding the administrative investigations. The PREA policy (100.29) reads as follows:

"Criminal and Administrative Investigations

- *The Indiana County Jail will conduct their investigation in conjunction with the PA State Police (Indiana Barracks) into allegations of sexual abuse and sexual harassment in a prompt, thorough manner and will always be objective when investigating allegations including those that are third party or anonymous.*
- *When sexual abuse is alleged, the PA State Police (Indiana Barracks) will be immediately contacted by the PREA Coordinator or Administration in their absence.*

- *Investigators will gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available recorded or electronic data. Alleged victims, suspected perpetrators, and witnesses shall be interviewed. All prior complaints and reports of sexual abuse involving the suspected perpetrator will be reviewed.*
- *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. The Indiana County Jail 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

- *The investigator shall include an effort to determine whether staff actions or failure to act contributed to the abuse.*
- *Document in written reports the description of the physical and testimonial evidence, the reasoning behind credibility assessments and the investigative facts and finding.*
- *Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documented evidence with copies attached of all documentary evidence where feasible.*
- *Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.*
- *The Indiana County Jail will maintain all written reports for as long as the alleged abuser is incarcerated or employed plus five years.*
- *Upon separation of employment with the Indiana County Jail or release from incarceration from the Indiana County Jail by the abuser or victim, this shall not provide a basis for terminating any investigation.*
- *When the PA State Police investigate sexual abuse for the Indiana County Jail, the jail will fully cooperate and shall maintain a (MOU) Memorandum of Understanding with PSP/Indiana Barracks to keep the jail informed about the progress of the investigation.*

(ICJ) administrative investigations will be completed within 45 days with an extension of 30 days if complaint is referred for criminal prosecution.

Standard 115.72 Evidentiary standard for administrative investigations

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

The (ICJ) staff members are clear that the standard is a preponderance of evidence and it is different than the evidentiary standard for criminal charges.

The PREA policy (100.29) states, in bold text:

"The Indiana County Jail shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated."

Standard 115.73 Reporting to inmates

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

While it was determined through interviews and review of investigation files, no reports to inmates regarding the outcome to the investigations were provided as it was not applicable to the investigations for this past year. However, (ICJ) has established a process for the notification to inmates explained in PREA policy 100.29. The policy reads as follows:

"The Indiana County Jail will, after a completion of an investigation, notify the inmate as to whether:

- The allegation was determined to be substantiated, unsubstantiated or unfounded.*
- If the (ICJ) did not conduct the investigation, they will request the (PSP)/Indiana Barracks to advise the inmate.*

Upon completion of the investigation, the inmate will be notified when:

- The staff member is no longer posted on the inmate's housing unit.*
- The staff member is no longer employed at the Indiana County Jail.*
- The (ICJ) learns that the staff member has been arraigned on a charge related to sexual abuse.*
- The (ICJ) learns that the staff member has been convicted on a charge related to sexual abuse.*

Following an inmate allegation that he or she has been sexually abused by another inmate, the (ICJ) will inform the victim when:

- The (ICJ) learns that the alleged abuser has been arraigned on a charge related to sexual abuse.*
- The (ICJ) learns that the alleged abuser has been convicted on a charge related to sexual abuse.*

All notifications will be in either written or verbal form by the PREA Coordinator. A record of notification will be signed by the inmate and PREA Coordinator on form 100.29-11 PREA Report Notification and will be kept as part of the investigation file in the administration area.

In addition, if the inmate is released prior to determination, the Indiana County Jail's obligation to notify will be terminated."

Standard 115.76 Disciplinary sanctions for staff

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

Interviews with staff and administration was clear that they would not tolerate the same behavior. The interviews indicated that there have been few staff members that were involved with an inmate. The PREA policy reads as follows:

"All staff will be subject disciplinary sanctions up to and including termination for violating this policy. Termination will be the presumption action for staff has engaged in sexual abuse."

Standard 115.77 Corrective action for contractors and volunteers

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

The Indiana County Jail has made it clear that they will only utilize contractors and volunteers who have a clean background check. If there would be a circumstance where the contractor or volunteer who be inappropriate, then the contracts of those individuals would be terminated.

This information is captured in the PREA Policy which reads as follows:

"Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and will be reported to the (PSP)/Indiana Barracks 724-357-1960, unless the information is clearly not criminal. The (ICJ) will take appropriate measures and will consider whether to prohibit further complications."

Standard 115.78 Disciplinary sanctions for inmates

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

While there have been very few incidents of sexual abuse since the establishment of a PREA policy at (ICJ), the policy does articulate how disciplinary sanctions will be handled. Disciplinary sanctions are outlined in the *"(ICJ) Disciplinary Procedures (300.04) policy following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse after the criminal investigation has been completed."*

The facility has outlined the PREA conditions in the Prison Rape Elimination Act PREA policy (100.29) which will also apply to the situations where sexual abuse or sexual harassment has been involved.

Standard 115.81 Medical and mental health screenings; history of sexual abuse

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

Prime Care Medical (PCM) is the contracted organization to provide medical and mental health services to (ICJ). (PCM) has done an excellent job by incorporating the appropriate questions into their initial screening process. Also, important to note is that the facility has received National Commission on Correctional Health Care (NCCHC) accreditation continually since 2011. What this means in relation to PREA is that all inmates are seen by medical and asked those PREA related questions within four hours of arrival at the facility.

Once this screening is completed, if the inmate indicated that they were either a victim or a perpetrator of sexual abuse, the medical staff will make an immediate referral for the individual to meet with the mental health staff member.

At the time of the medical questionnaire, the nurse completing the intake will provide the informed consent information to the individual, explaining what information about sexual abuse they are required to report, and sexual abuse which they are not required to report, but will still make a referral to the mental health practitioner for follow up.

Standard 115.82 Access to emergency medical and mental health services

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

Prime Care Medical provides a full variety of medical services as required by their contract with (ICJ). The nurses will provide examinations for any inmate reporting sexual abuse within the facility. Once the medical evaluation has been completed, there will also be a referral to the mental health practitioner for a follow up.

If after a medical evaluation after a sexual abuse allegation indicates the need for additional medical services or reporting falls within the 96-hour timeframe for reporting such incidents, then medical staff will make the determination, in consultation with security staff, to have the inmate go to Indiana Regional Medical Center (IRMC). (IRMC) has Sexual Assault Forensic Examiners (SAFE) on staff to provide this evaluation.

Through interviews with the (PCM) staff, there has only been one case in which this needed to occur and it was for a female who was sexually assault prior to entering the facility, but still in the 96-hour timeframe. Staff indicated that it was a good experience and representatives from the Alice Paul House (APH) were present to talk with the inmate about the sexual abuse.

The contracted medical staff at (ICJ) is not 24 hours per day. Currently there are no medical staff in the building from 10:30pm through 6:00am. If there is a need for medical advice, the Sergeant on duty has the ability to reach an on-call staff member. The on-call person will direct security staff in what should be done with the inmate.

In any case where the inmate is taken to (IRMC) for a forensic examination, there are no charges for the treatment that the inmate receives in relation to the sexual abuse.

Standard 115.83 Ongoing medical and mental health care for sexual abuse victims and abusers

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

All victims of sexual abuse in the facility will receive a medical and mental health evaluation by the contracted medical and mental health staff when they have been involved in a sexual abuse. As with any care provided in the facility, *"The evaluation and treatment will include follow up services, treatment plans, and if necessary, referrals for continued care following their transfer or release from custody."*

Interviews with the nurses indicated that they believe that the level of care in which inmates receive is at least equal, if not better, than what they would receive in the community. Several of the nurses indicated that the wait times in the facility are much less than what they would experience out in the community, especially for mental health services.

For the female inmates, if there would be a sexual assault that occurred, they would either be offered a pregnancy test at the hospital when the report happens in the 96-hour window, or by the contracted medical staff if it is reported outside the 96-hour window.

Should there be a pregnancy that occurs due to the abuse while incarcerated at (ICJ), all lawful pregnancy related options will be provided to the inmate. The medical staff keep those resources on hand, as they conduct a pregnancy test on all female individuals when they are booked into the jail.

As is the case in all medical/mental health services related to a sexual abuse that occurred inside of (ICJ), there will be no cost to the individual for those services.

Standard 115.86 Sexual abuse incident reviews

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

Through the interviews conducted in the onsite audit with numerous staff members, it is noted that in the preceding twelve months, there have been no sexual abuse investigations, only sexual harassment investigations, which do not require a sexual abuse incident review to be conducted.

The PREA Coordinator did indicate that the facility has had to conduct sexual abuse incident reviews in the past, just not over the last twelve months.

Review of policy and onsite documents showed that the facility does have an appropriate process in place to conduct these meetings when needed. The policy outlines the individuals which need to be present at the meeting, the topics that are to be covered and the timeframe that these must occur in. Additionally, the PREA Coordinator has developed a form that is covered and completed at every sexual abuse incident review that the facility must conduct.

Standard 115.87 Data collection

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

The PREA Coordinator is responsible for collecting the data on allegations of sexual abuse and sexual harassment in the facility. She collects this data through both the counselors who are responsible for keeping some information in relation to the risk assessments and the education and by reviewing the investigation files for the year. Noted in policy, *"The information collected for each incident will 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."*

According to policy, *"All information will be saved on a secure drive on the PREA Coordinator's office computer that is password protected. All printed and written information will be placed in a file marked clearly for identification purposes and maintained in a locked secure filing cabinet located in the administrative area of the jail that requires special access."*

Standard 115.88 Data review for corrective action

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

relevant review period)

- ☐ Does Not Meet Standard (requires corrective action)

Annual reports are available through the Indiana County's website. Currently the 2015 annual report is available, along with the statistics of sexual abuse and sexual harassment allegations and investigations for all the facilities in which (ICJ) contracts with to hold Indiana County inmates. After viewing all reports displayed on the website, it is clear that none of reports or statistics contain any identifiers which would make it possible for any inmate or staff member to be identified.

Standard 115.89 Data storage, publication, and destruction

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

The (ICJ) keeps all PREA related information in the administration area of the facility. This area is not accessible to inmates. All information is maintained by the PREA Coordinator. All electronic information is stored on the PREA Coordinator's computer, which is password protected.

PREA reports are published on the county's website. In addition, the facility displays its annual report in the lobby of the facility.

It is in the PREA policy that all information will be maintained for a 10-year period of time.

Standard 115.403 Audit Content and findings

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

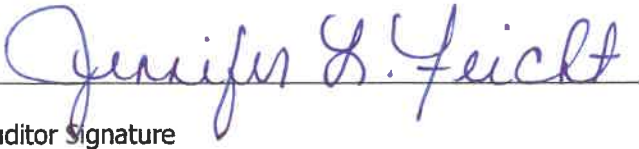
Initially, the 2015 PREA Audit Report was not displayed on the jail's website as required by this standard. The facility corrected that deficiency by placing the audit report on the website and has ensured that this report will also be displayed on the jail's webpage as well.

AUDITOR CERTIFICATION

I certify that:

- ☒ The contents of this report are accurate to the best of my knowledge.

- ☒ No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- ☒ I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.


Auditor Signature

July 20, 2018

Date