

# PREA AUDIT: AUDITOR'S SUMMARY REPORT

## ADULT PRISONS & JAILS

NATIONAL  
PREA  
RESOURCE  
CENTER



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

<b>Name of facility:</b>		Indiana County Jail	
<b>Physical address:</b>		665 Hood School Rd. Indiana Pa, 15701	
<b>Date report submitted:</b>		26 August 2015	
<b>Auditor Information</b>			
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<b>Date of facility visit:</b>		4 – 6 May 2015	
<b>Facility Information</b>			
<b>Facility mailing address:</b> (if different from above)			
<b>Telephone number:</b>			
<b>The facility is:</b>		<input type="checkbox"/> Military <input checked="" type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Private for profit <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Private not for profit	
<b>Facility Type:</b>		<input checked="" type="checkbox"/> Jail <input type="checkbox"/> Prison	
<b>Name of PREA Compliance Manager:</b>		<b>Title:</b>	
Lori Hamilton			Deputy Warden (Operations)
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lhamilton@countyofindiana.org			724-471-7502
<b>Agency Information</b>			
<b>Name of agency:</b>		NA	
<b>Governing authority or parent agency:</b> (if applicable)			
<b>Physical address:</b>			
<b>Mailing address:</b> (if different from above)			
<b>Telephone number:</b>			
<b>Agency Chief Executive Officer</b>			
<b>Name:</b> Samuel Buzzinotti		<b>Title:</b>	Warden

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<b>Agency-Wide PREA Coordinator NA</b>		
<b>Name:</b>	<b>Title:</b>	
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## AUDIT FINDINGS

### NARRATIVE:

The Prison Rape Elimination Act (PREA) audit of Indiana County Jail was conducted May 4 – 6, 2015. Approximately five months prior to the audit, the auditor received the Indiana County Jail PREA policy; and two weeks prior to the audit, the auditor received the PREA questionnaire with attached documents. The auditor contacted Just Detention International (JDI); JDI had not heard from any inmates at Indiana County Jail. The auditor and the agency discussed additional documents required, recommended policy changes, and a tentative schedule. The night before the audit the facility provided a roster of all inmates housed at the facility; lists of inmates for specific categories to be interviewed; and a lists of all staff by duty position and shifts that were used to identify inmates and staff to be interviewed (random and specific category).

The audit began with a brief entrance meeting with key leadership. The auditor explained the process and schedule of the audit. He praised the Indiana County Jail leadership for their obvious commitment to PREA and operating a safe prison for staff and inmates. Indiana County Jail was one of the first jails in Pennsylvania to seek PREA certification. Following the entrance meeting, the Warden and Deputy Wardens gave the auditor a tour of the facility. The notice of the posting declaring this PREA audit was clearly visible, as were the PREA posters providing inmates and staff information about PREA to include rights and how to report.

Following the tour, the auditor began the interviews and reviews of investigative files and other documents such as training records, and inmate and staff records; observed cameras and monitors; and tested the inmate phone system for reporting allegations. In all, the auditors conducted 49 interviews. Sixteen inmates were interviewed. Inmates interviewed were either randomly selected by the auditor, with at least one per housing unit or who were identified as being in a designated group (e.g., disabled, limited English speaking ability, gay, or who had reported a sexual abuse). A total of 33 staff were interviewed, at least ten randomly selected staff and other staff who were identified as "specialized staff", including the Warden, PREA Compliance Manager, investigators, first responders, health care providers, mental health professionals, volunteers and contractor. The audit team was impressed by how knowledgeable the correctional officers and other staff were about PREA, offender rights regarding PREA, and first response responsibilities.

The auditor reviewed eight of eight investigations of PREA allegations. Of the eight allegations: there were three substantiated and two unfounded inmate on inmate sexual harassment cases; one unfounded sexual abuse allegation prior to confinement in Indiana County Jail; and two substantiated staff on inmate sexual harassment allegations.

When the on-site audit was completed, the auditor conducted an exit meeting. While the auditor could not give the facility a final finding, as there were some issues needing further documentation and clarification, the auditor did give an overview of the audit and some of the findings. The auditor thanked Indiana County Jail staff for their hard work and commitment to PREA and safety of its staff and inmates.

During the interim report writing period and corrective action period, the auditor reviewed modified policies; and additional documents. Warden Buzzinotti and Deputy Warden Hamilton were very helpful in coordinating the additional documentation.

## **DESCRIPTION OF FACILITY CHARACTERISTICS:**

The Indiana County Jail houses both male and female inmates. The facility is one building with three single cell housing units, six multiple occupancy cell housing units, two open bay/dorm housing units, and various administrative and facility support offices and areas. At the time of audit, the inmate count was 174. Inmates are provided opportunities for education, employment, and programs to acquire the skills and values necessary to become productive law abiding citizens. The facility is accredited through the American Correctional Association and National Commission on Correctional Health Care (NCCHC); and certified by the Pennsylvania Department of Corrections.

The mission of the Indiana County Jail is to safely, securely, and humanely detain persons arrested and held during adjudication, convicted offenders sentenced to jail, and other persons lawfully committed to the facility.

## **SUMMARY OF AUDIT FINDINGS:**

On May 4 – 6, 2015, the on site visit was completed. The Interim Report identified five (5) standards the Indiana County Jail did not meet during the audit. The PREA Compliance Manager and the auditor created a corrective action plan. All corrective actions were completed and sent to the auditor on or before July 21, 2015. The auditor reviewed and approved the final corrective action on July 21, 2015. The Indiana County Jail were in complete compliance with the PREA Prisons and Jail Standards as of July 21, 2015. The results of Indiana County Jail PREA audit is listed below:

Number of standards exceeded: 3  
Number of standards met: 39  
Number of standards not met: 0  
Non-applicable: 1

### **§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 written policy (Policy 100.29 Prison Rape Elimination Act) mandating zero tolerance towards all forms of sexual abuse and sexual harassment. The Indiana County Jail Policy 100.29 does not completely cover every standard, but outlines the Jail's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. Policy 100.29 has been continually revised over the last few years as Indiana County Jail developed and implemented PREA guidance and procedures. The policy was first established in 2009, and updated during the report writing period. Other jail policies supplement the main PREA policy to include: 100.43 Staffing Requirements; 300.22 Searches; 100.06 Staff Promotions; 100.2 Training; and 100.01 Hiring and Training new Employees. Indiana County Jail also created a number of PREA forms to standardize specific actions related to PREA allegations. This was a good initiative and assisted the Indiana County Jail in being compliant with PREA standards.

Deputy Warden of Operations Hamilton is the Jail PREA Coordinator/Compliance Manager. She claimed to have enough time to perform her PREA duties. She has the authority to develop, implement, coordinate, and oversee the facility's efforts to comply with the PREA standards. She has been very active implementing PREA training and procedures.

During the interviews of Warden Buzzinotti and Deputy Warden Hamilton, it was obvious they understood the PREA standards and was supportive to making change in policy and culture to ensure the safety of staff and inmates from sexual assault and harassment. Warden Buzzinotti ensures Deputy Warden Hamilton has the authority and support to oversee PREA implementation and activities.

### **§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)

Indiana County Jail has three contracts for confinement of juveniles. The three contracts are with: York County Prison; Westmoreland County Juvenile Detention Center and Youth



Shelter; and Cornell Abraxas Group. Initially the contracts required the facilities to adopt and comply with PREA. It initially did not include specific language allowing the Indiana County Jail to monitor for compliance with PREA standards, the contracts did include a statement of general monitoring. During the report writing period, Indiana County Jail began renewing those contracts with the stipulation that contract monitoring would be done for PREA compliance. The auditor was provided a copy of the first contract amended to include the agency's monitoring contract facilities to ensure that the contractor is complying with the PREA standards.

### **§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)

Indiana County Jail policies 100.29 and 100.43 addresses developing and reviewing of the facility staffing plan. Indiana County Jail has developed a staffing plan and makes its best efforts to comply with the plan. The staffing plan is always met through overtime. Only the Warden in an emergency can approve not meeting the staffing plan per policy 100.29. The staffing plan is reviewed annually by the Warden and Deputy Wardens since 2009. The Indiana County Jail needs to do a better job of documenting during the review that the review was based on the eleven criteria of the standard to include generally accepted correctional practices; any judicial findings of inadequacy; any findings of inadequacy from Federal investigative agencies; any findings of inadequacy from internal or external oversight bodies; all components of the facility's physical plant; composition of the inmate population; number and placement of supervisory staff; institution programs occurring on a particular shift; any applicable State or local laws, regulations, or standards; prevalence of substantiated and unsubstantiated incidents of sexual abuse; and other relevant factors. The Warden during his interview was able to discuss how he reviewed the staffing plan using the criteria. The last review was done February 2015. Indiana County Jail senior staff make unannounced PREA checks on all shifts, documenting the checks on established forms and housing unit logs. Indiana County Jail policy 100.29 prohibits staff from alerting other staff members that supervisory staff rounds are occurring. The auditor reviewed several daily logs and the supervisor unannounced rounds forms that confirmed the unannounced rounds are conducted. The forms were filled out with good observations and recommendations, which demonstrated the unannounced rounds are taken seriously. Staff and inmate interviews confirmed the unannounced rounds by supervisors.

### **§115.14 – Youthful Inmates**

- ☐ Exceeds Standard (substantially exceeds requirement of standard)

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

Indiana County Jail has three contracts for confinement of youthful offenders. The three contracts are with: York County Prison; Westmoreland County Juvenile Detention Center and Youth Shelter; and Cornell Abraxas Group. These contracts allows Indiana County Jail not to confine youthful offenders.

#### **§115.15 – Limits to Cross-Gender Viewing and Searches**

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

Through review of policies 100.29 and 300.22, review of documentation, interviews and observation Indiana County Jail requires staff of the opposite gender to announce their presence when entering an inmate housing unit; does not conduct cross-gender strip searches or cross-gender visual body cavity searches except in exigent circumstances or when performed by medical practitioners; nor does the staff search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. The Indiana County Jail has not conducted any cross gender pat down or strip searches during the audit cycle. If this had occurred, the incident would have been documented according to policy and interview of the PREA Compliance Manager. Policy and procedures are implemented to enable inmates to shower, perform bodily functions, and change clothes without non-medical staff observing their genitalia or buttocks. Policy also covers video viewing. Observation during the on-site audit and interviews with inmates confirmed that staff of the opposite gender do not view inmates of the opposite gender while they shower, change clothes, or perform bodily functions. There have been no reports of exigent circumstances in the past year that required deviance from cross gender viewing. This was verified through observation during the on-site audit and through interviews with inmates and staff.

Prior to the audit, Indiana County Jail made some changes to the shower area based on a sexual harassment allegation that was substantiated that a male staff member was observing female inmates in the showers through the camera system. The modifications were very effective. During the audit, the auditor determined staff could observe the male segregation showers from the second tier, and female staff could observe male genitalia while they were showering. The jail leadership and the auditor discussed options during the audit, this was corrected during the report writing period. The facility provided pictures to the auditor demonstrating compliance.

Through interviews of staff and reviewing training records it was determined staff was trained to conduct cross-gender pat-down searches, but not how to conduct pat-down searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. There was no lesson plan, slides, or training roster demonstrating training was done (115.15 (f)). During the interim report writing period training slides were established. During the corrective action period, Indiana County Jail completed the training and provided copies of the training slides and training records that staff were trained on how to conduct pat-down searches of transgender and intersex inmates in a professional and respectful manner.

#### **§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)

Indiana County Jail takes appropriate steps to ensure inmates with disabilities and inmates with limited English proficiency have an opportunity to participate in and benefit from the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Informational and educational materials for inmates with disabilities or who are limited English proficient are provided in ways that will enable the inmate to understand the Indiana County Jail zero tolerance policy and related material and be able to make a claim of sexual abuse or sexual harassment, if necessary. PREA posters, handouts and inmate handbooks are in English and Spanish. Both inmates and staff stated inmates are not used as interpreters, especially if it is an issue with sexual abuse and sexual harassment.

#### **§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)

Through review of personnel records and interviews it was determined Indiana County Jail has established a system of conducting criminal background checks for new employees and contractors who may have contact with inmates to ensure they do not hire or promote anyone who had engaged in sexual abuse in a prison or other confinement setting; been convicted of engaging or attempting to engage in sexual

activity in the community facilitated by force, coercion, or if the victim did not consent or was unable to consent or refuse; or had civilly or administratively adjudicated to have engaged in sexual activity in the community facilitated by force, coercion, or if the victim did not consent.

Initial background checks use a number of systems to include National Crime Information Center (NCIC) files and local police checks. The agency uses a continuous system of background checks for employees that provides a notice whenever an employee is involved with law enforcement using NCIC and the Pennsylvania Commonwealth Law Enforcement Assistance Network (CLEAN) systems in lieu of doing background checks every five years. Contractors go through background checks every five years.

Review of policies 100.29, 100.6, and 100.1, personnel records, and interviews verified that the agency considers incidents of sexual harassment in hiring of staff. Indiana County Jail contacts previous employers to provide information which was verified by examples of requests and interviews. The agency imposes upon employees a continuing affirmative duty to disclose any misconduct to include sexual abuse or sexual harassment.

At the time of the audit, Indiana County Jail had not requested employees who may have had direct contact with inmates to disclose previous misconduct as described in standard 115.17 (a) during their annual written self-evaluations (115.17 (f)). Corrective action required Indiana County Jail to update policy and document employees confirming no previous misconduct during written self evaluations. During the report writing period the policy and form was updated. The form initially was too generic and needed to be more specific to the standard. The form was updated to meet the standard and implemented in June 2015. The facility provided the auditor copies of the forms from staff who received an evaluation in June and July. The Facility has established a system and is now in compliance with the standard.

#### **§115.18 – Upgrades to Facilities and Technology**

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

The auditor determined through the review of policy, camera plan, and camera monitors; and interviews of the Warden and PREA Compliance Manager; that when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the Indiana County Jail considers how such technology may enhance their ability to protect inmates from sexual abuse. Indiana County Jail has approximately 212 cameras. Through interviews, observation during tours and camera purchase documentation they have improved security and their ability to protect inmate and staff from sexual abuse through the use of technology in areas the Warden and Deputy Warden's determined best needed.



### **§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)

Indiana County Jail policies outline evidence protocols for obtaining usable physical evidence for administrative proceedings and criminal prosecutions, and requirements for forensic medical exams. Indiana County Jail handles all the administrative proceedings regarding PREA allegations. The Pennsylvania State Police conducts all criminal investigations. There is a Memorandum of Understanding (MOU) between Pennsylvania State Police that outlines responsibilities for conducting criminal investigations of allegations of sexual crimes. The facility is responsible for all administrative investigations. Indiana Regional Medical Center is the hospital with trained SANE/SAFE for forensic exams. Services are provided at no costs to the inmate. There was no forensic medical examination conducted during the audit period. During the interviews, medical staff said there had not been a request for a forensic exam in at least the last four years. Indiana County Jail has a Letter of Agreement with Alice Paul House to provide victim advocate services to the victim to include to accompany and support the victim through the forensic medical process and investigation process, provide emotional support, crisis intervention, information, and referrals to the victim. The auditor interviewed a representative from the Alice Paul House. She was very supportive of providing any and all victim advocate services the facility needed.

This standard exemplifies the collaborative approach of the Indiana County Jail as evident by the MOUs and great support provided by the Pennsylvania State Police, Indiana Regional Medical Center, Alice Paul House, and Pennsylvania Department of Corrections.

### **§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)

Indiana County Jail policy requires an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment, that all allegations of sexual abuse or sexual harassment are referred for investigation by the appropriate authority. All cases referred for investigation. There is a MOU with the Pennsylvania State Police to conduct all criminal investigations. An administrative or criminal investigation was



completed on all allegations of sexual abuse and sexual harassment at the Indiana County Jail.

Indiana County Jail had seven sexual harassment allegations and one sexual abuse allegation during the audit cycle. The auditor reviewed all eight allegations during the rating cycle: five were administrative investigated by the Indiana County Jail investigators, three were investigated by the Pennsylvania State Police. Seven happened in the facility, one occurred prior to incarceration. Inmate alleged it occurred prior to incarceration but did not want a forensic exam after was taken to medical. Case was referred to Pennsylvania State Police because it was alleged to not have occurred at a facility. Indiana County Jail investigated five cases, Pennsylvania State Police investigated three cases. There were three substantiated and two unfounded inmate on inmate sexual harassment cases; one unfounded sexual abuse allegation prior to confinement in Indiana County Jail; and two substantiated staff on inmate sexual harassment allegations. The staff on inmate sexual harassment was an inappropriate relationship and a staff member watching inmates in the showers through the camera system. One allegation of inmate on inmate sexual abuse occurred on the weekend before the audit, and was pending investigation during the audit.

At the time of the audit, the Indiana County Jail did not publish on its Web site that all allegations of sexual abuse and/or sexual harassment will be investigated and what agency was responsible for the investigation of the allegations. The PREA fact sheet on the website needed to be expanded reference investigations and which agencies are responsible for what type of investigations. During the corrective action period the Indiana County Jail updated the PREA fact sheet on its website that identified what agency was responsible for the investigation of the allegations.

### **§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)

All Indiana County Jail staff had received training on PREA. Review of the policies and lesson plans training included all required subjects of the standard. Interviews of staff demonstrated they understand the zero tolerance policy; the agency policy and procedures for prevention, reporting and response to a sexual assault or sexual harassment incident, and the reporting requirements and procedures. The auditor reviewed lesson plans, PowerPoint PREA presentations, and documents that staff understood the training. The auditor was provided some of the documents before the audit and randomly selected additional staff training records to be reviewed during the on-site audit. PREA training was conducted in 2012, 2013, and 2015. For 2015, training was documented with the employee signature that employees understand the PREA training they received.

### **§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)

All contractors and volunteers 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. Interviews of contractors and volunteers demonstrated their knowledge of PREA and their responsibilities and agency zero tolerance policy. The auditor reviewed contractor and volunteer training records, each have to sign a PREA Training Acknowledgement form. Signing started in April 2015

Auditor was also required to read their PREA memorandum.

### **§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)

Policy 100.29 provides guidance on PREA inmate education. During intake, inmates are provided PREA information through fliers in the intake area, and inmate rule book (both available in English and Spanish) that explains the agencies zero tolerance policy regarding sexual abuse and sexual harassment; and how to report such incidents. During facility orientation they receive additional training which consists of a video and additional information which expands on the previous information provided in the pamphlet and handbook. Posters and inmate handbooks are provided to inmates or posted in the housing units in formats accessible to all inmates. Posters remind inmates how they can report sexual assault or sexual harassment. PREA information is also on the kiosk; it must be reviewed the first time using the kiosk and is available for viewing any time using the kiosk. The inmates sign an acknowledgement of having received the training on the kiosk.

During the tour and interviews most inmates acknowledged the information being provided upon arrival, during orientation, and the kiosk. They definitely knew the agency zero tolerance policy. The auditor had one inmate pull up the information on the kiosk. Kiosk are available in all housing units. The auditor also reviewed additional inmate training records while on site.

#### **§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)

Two investigators were trained to conduct sexual abuse investigations by the Pennsylvania Department of Corrections. The auditor reviewed the curriculum and training materials and found them to meet the standard. The training included 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 training was documented for each investigator. The interview of investigators demonstrated they understood the how to conduct a sexual abuse investigation in a confinement setting and what their roles were. Indiana County Jail investigators also attend the general PREA training required of all employees, signing that they understood the training.

#### **§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)

Through review of the questionnaire, training records, and interviews, it was determined the medical and mental health care staff received the basic PREA training all staff or contractor receive as applicable, and the specialized medical and mental health training. Review of the PowerPoint presentation demonstrated the training included: how to detect and assess signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. All training was documented in the training records. Medical staff at the facility do not perform nor are trained to conduct forensic examinations.

#### **§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)

The auditors reviewed Indiana County Jail policy 100.29, screening forms, and interviewed staff and inmates. Starting in February 2015, all inmates are assessed during intake screening for their risks of being sexually abused by other inmates or sexually abusive towards other inmates. Counselors conduct the screen within 72 hours of the inmate's arrival. Inmates are not disciplined for refusing to answer questions. By policy the inmate's risk level is reassessed again between 20 – 30 days; and reassessed again 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. The auditor reviewed random screening forms. The inmate population remembers being asked the questions and being screened upon arrival. Staff interviews confirmed appropriate controls have been implemented to ensure that sensitive information is not released and exploited by staff or other inmates. Access to the forms are limited to the counselors, deputy wardens and warden. The auditor observed the forms being stored in the counselor office in a locked cabinet.

The auditor had two counselors conduct a screen on the auditor. The process was done very professional. A review of the screening form and the screen conducted by the counselor demonstrated not all the criteria referenced in the standard are in the form. The process did not address whether the inmate's criminal history was exclusively nonviolent or whether the inmate had prior convictions for sex offenses against an adult or child. The process also did not require the screener to determine if the inmate was gender non-conforming. A majority of the questions were asked (specifically required to be asked of the inmate) and inmate records were checked to verify the information provided. During the report writing and corrective action period the form was modified and implemented. The auditor was provided a copy of the new form and six examples of the forms being implemented.

#### **§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)

The Indiana County Jail uses the screening information to determine housing, bed, work, education, and program assignment with the goal of keeping inmates at high risks of being sexually victimized separate from those at high risks of being sexually abusive. These decisions are made on a case by case basis using information from the screen, assigned PREA classification, and good correctional judgment. By policy lesbian, gay, bisexual, transgender, or intersex (LGBTI) inmates are not housed in dedicated facilities or housing units; transgender or intersex inmates are reassessed twice each year and their own views with respect to his or her own safety are given serious consideration;



and they have the opportunity to shower separately. Interview of inmates and staff confirmed LGBTI inmates are not housed together based on their identification or status. There has been no transgender or intersex inmate during the audit period.

#### **§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)

Agency policy 100.29 states inmates at high risks 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. No inmate was placed in protective custody due to being at high risks for sexual victimization. Staff interviews verified inmates at high risks of sexual victimization are not placed in involuntary segregation unless other measures have been assessed, and that none had been placed in involuntary segregation.

#### **§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)

Through interviews of inmates, staff and review of policy 100.29, inmate handbooks and posters Indiana County Jail demonstrated multiple internal and external ways for inmates to report sexual abuse and sexual harassment. Inmates can report verbally and in writing to staff; make a hotline call to SCI Camp Hill (Pennsylvania Department of Corrections Facility), and Indiana County Jail website provides for third party reporting. Use of SCI Camp Hill is by MOU with Pennsylvania Department of Corrections. Staff accept reports made verbally, in writing, anonymously, and from third parties, and are promptly document any verbal reports. The auditor called the SCI Camp Hill Line and discussed the process with staff that monitor the phone line. Inmate interviews confirmed inmates are informed of and know of the multiple ways they can report allegations of sexual abuse or harassment.



### **§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)

Indiana County Jail has adopted administrative procedures to address offender grievances regarding sexual abuse and the procedures are consistent with the standard in terms of timeliness and process. Review of policies 100.29 and 300.38 and staff and offender interviews confirm the system is established. There was no indication that inmates have used the grievance procedure to report any allegation of sexual abuse.

### **§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)

Indiana County Jail has a Letter of Agreement with Alice Paul House to provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses to Alice Paul House. Mail is not checked going out. PREA Compliance Manager or counselor can call the outside victim advocate for the inmate if requested, and the inmate can then talk to them over the phone or in person. The auditor interviewed Alice Paul House staff, there seemed to be a very good working relationship between Alice Paul House and the Indiana County Jail, they seemed very professional and willing to provide support. Other agencies available include "Open Door", Indiana County Office of Human Services, and National Sexual Assault hotline. Information is posted in the facility and on the website.

### **§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)

Indiana County Jail has establish a method to receive third-party reports of sexual abuse and sexual harassment and provides the information on how to report sexual abuse and sexual harassment on behalf of an inmate on its website. Indiana County Jail web site has a PREA section on their home page, and the PREA section is easily accessible.

Inmates and others can make a third party call to SCI Camp Hill (Pennsylvania Department of Corrections Facility). Use of SCI Camp Hill is by MOU with Pennsylvania Department of Corrections. The auditor called the SCI Camp Hill Line and discussed the process with staff that monitor the phone line. Posters at the facility provide the inmates a telephone number and link family friends can report sexual misconduct to include retaliation as a third party. Discussion with inmates demonstrated they knew how third party reporting could be accomplished.

#### **§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)

Indiana County Jail policy 100.29 requires all staff to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse; and for staff not to reveal any information related to a sexual abuse report to anyone other than extent necessary. Indiana County Jail policy also states staff can be disciplined if they reveal any information related to a sexual abuse report to anyone other than extent necessary. Staff are trained that the information a staff member pass on to superiors is confidential information and should be shared only with staff who have a designated "need to know." Review of investigative files; and interviews of staff and offenders verified staff immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment; and that staff does not reveal information related to a sexual abuse report other than to people authorize to discuss the report. Interviews with offenders and staff did not reveal any incident of sexual abuse or harassment not reported. Indiana County Jail has two forms for reporting incidents involving those under the age of 18 to Pennsylvania State Police and Pennsylvania Child Line Representatives.

#### **§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)

Indiana County Jail policy requires staff to take immediate action to protect any offender they learn is subject to substantial risks. During the random interviews with staff all the correctional officers and non-security staff knew the steps to take to protect an offender subject to risks of imminent sexual abuse to include to remove the inmate from the immediate danger and notify their supervisor. Security staff immediately employs

protection measures as the information is reported. Per interview with PREA Compliance Manager, no offender has reported substantial risks of sexual abuse.

#### **§115.63 – Reporting to Other Confinement Facilities**

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

Indiana County Jail policies requires when an allegation is made that an inmate was sexually abused while confined at another facility, the Warden shall notify the Warden of the facility where the allegation occurred as soon as possible and within 24 hours. It is followed up by mail or email. Indiana County Jail uses a form to capture the information and to be provided hard copy. Interviews with the Warden and PREA Compliance Manager confirmed they knew the process when an allegation is made that an inmate was sexually abused while confined at another facility.

#### **§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)

Indiana County Jail policies specify procedures to respond to an allegation of sexual abuse for both security and non-security staff. Random interviews with staff confirmed both security and non-security staff knew upon learning of an allegation that an inmate was sexually abused they should: separate the alleged victim and abuser; preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; and if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim and abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Medical staff and investigators knew their roles and steps they would take in responding to an allegation of sexual abuse

#### **§115.65 – Coordinated Response**

- ☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Indiana County Jail policy described the actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership; along with other policy and procedures to prevent sexual abuse and harassment. Interviews with staff (first responders, medical and mental health practitioners, investigators, and facility leadership) confirmed they were knowledgeable about the PREA plan and the coordinated duties and collaborative responsibilities. Correctional officers and other staff reported they have been trained on their specific duties, but are also aware of the responsibilities of other parties.

#### **§115.66 – Preservation of Ability to Protect Inmates from Contact with Abusers**

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Through review of the collective bargaining agreement and interview of the Warden and Union Representative, the collective bargaining agreement nor the agency policy restrict facility administrators from suspending staff pending investigations, removing staff from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. The agreement is for January 2013 – December 2016 with the Independent Correctional Officers of Pennsylvania Lodge 3. The auditor observed a very good working relationship between Warden and Union Representative. The Union Representative was very knowledgeable of PREA and PREA requirements.

#### **§115.67 – Agency Protection Against Retaliation**

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Indiana County Jail has established a policy to protect all inmates who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and has designate which staff members or

departments are charged with monitoring retaliation for inmates. The PREA Compliance Manager by policy and in practice monitors inmates and staff and would employ protection measures, such as housing changes, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates who fear retaliation for reporting sexual abuse or for cooperating with investigations. Interviews of the Warden and the PREA Compliance Manager (monitors for retaliation) demonstrated they knew the requirements and procedures that would be used.

#### **§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)

Indiana County Jail policies states inmates who is alleged to have suffered sexual abuse 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. There has been no allegation of sexual abuse. Staff interviews verified inmates who had suffered sexual abuse are not placed in involuntary segregation unless other measures have been assessed, and that none had been placed in involuntary segregation. There were no inmates in segregation involuntarily for sexual victimization at the time of the audit.

#### **§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)

Based on review of the investigations, policies, and interviews of investigators and inmates it was determined investigations into allegations of sexual abuse and sexual harassment are done promptly, thoroughly, and objectively for all allegations. All investigators used have received special training in sexual abuse investigations. The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and not determined by the person's status as inmate or staff. Indiana County Jail does 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. Investigation files were organized and properly documented. Written reports are maintained as long as the alleged abuser is incarcerated or employed by the agency,



plus five years. Indiana County Jail only had seven sexual harassment and one sexual abuse cases in last 12 months.

Indiana County Jail policy requires an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment, that all allegations of sexual abuse or sexual harassment are referred for investigation by the appropriate authority. All cases referred for investigation. There is a MOU with the Pennsylvania State Police to conduct all criminal investigations. Indiana County Jail had a very good working relationship with Pennsylvania State Police. An administrative or criminal investigation was completed on all allegations of sexual abuse and sexual harassment at the Indiana County Jail.

Indiana County Jail had seven sexual harassment allegations and one sexual abuse allegation during the audit cycle. The auditor reviewed all eight allegations during the rating cycle: five were administrative investigated by the Indiana County Jail investigators, three were investigated by the Pennsylvania State Police. Seven happened in the facility, one occurred prior to incarceration. Inmate alleged occurred prior to incarceration but did not want a forensic exam after was taken to medical. Case was referred to Pennsylvania State Police because it was alleged to not have occurred at a facility. Indiana County Jail investigated five cases, Pennsylvania State Police investigated three cases. There were three substantiated and two unfounded inmate on inmate sexual harassment cases; one unfounded sexual abuse allegation prior to confinement in Indiana County Jail; and two substantiated staff on inmate sexual harassment allegations. The staff on inmate sexual harassment was an inappropriate relationship and a staff member watching inmates in the showers through the camera system. One allegation of inmate on inmate sexual abuse occurred on the weekend before the audit, and was pending investigation during the audit.

#### **§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)

Review of the Indiana County Jail policies, interview of investigators and review of investigations demonstrate Indiana County Jail does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

#### **§115.73 – Reporting to Inmate**

- ☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Indiana County Jail policy requires the inmate be notified: following an investigation into an inmate's allegation that he or she suffered sexual abuse whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded; subsequently inform 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 or employed at the facility; staff member has been indicted on a charge or convicted on a charge related to sexual abuse within the facility; and if sexually abused by another inmate subsequently inform the alleged victim whenever the alleged abuser has been indicted or convicted on a charge related to sexual abuse within the facility.

#### **§115.76 – Disciplinary Sanctions for Staff**

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Per Indiana County Jail policies, bulletins, posters, and interviews with staff: staff are subject to disciplinary sanctions for violating agency sexual abuse or sexual harassment policies; termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse; and disciplinary sanctions for violations of agency 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. Two staff resigned prior to disciplinary action could be administered for sexual harassment allegations that were substantiated. One was charged criminally with invasion of privacy.

#### **§115.77 – Corrective Action for Contractors and Volunteers**

☐ Exceeds Standard (substantially exceeds requirement of standard)

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

☐ Does Not Meet Standard (requires corrective action)

Indiana County Jail policies prohibit contractors or volunteers who engaged in sexual abuse to have contact with inmates. Interviews with the PREA Compliance Manager and Warden confirmed there have been no founded allegations of sexual abuse by contractors

or volunteers during the audit cycle; and that sexual abuse by contractors and volunteers would be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Interviews with contractors and volunteers confirmed they knew the punishment for engaging in sexual abuse or sexual harassment of inmates.

#### **§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)

Per Indiana County Jail policies 100.29 and 300.44 and interviews with staff and inmates; inmates are subject to disciplinary sanctions following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse; sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories; and considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior. There was no disciplinary action during the audit cycle. Indiana County Jail policy 100.29 addresses consensual sexual activity between offenders as prohibited, will not be tolerated, but is not a crime. Indiana County Jail could update policy 100.29 to make it clearer that consensual sexual activity is not sexual abuse, though prohibited. It is clearly addressed in the inmate handbook.

#### **§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)

During the audit it was determined Indiana County Jail policies required medical and mental health follow-up meeting within 14 days for those inmates who experienced prior sexual victimization or previously perpetrated sexual abuse, whether in a prison/jail setting or in the community. Interviews of medical and mental health staff confirmed follow-up meetings would be scheduled and conducted. One inmate who alleged sexual abuse prior to incarceration was offered medical and mental health follow-up meeting.

### **§115.82 – Access to Emergency Medical and Mental Health Services**

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

Review of Indiana County Jail policies, fliers, and interviews with staff confirm inmate victims of sexual abuse would receive timely, unimpeded access to emergency medical treatment and crisis intervention services; and offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, where medically appropriate. Treatment is provided to the victim at no costs. No inmates have alleged sexual abuse while confined in the last year.

### **§115.83 – Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers**

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

Indiana County Jail policies, interviews with medical and mental staff demonstrate inmates would receive on-going medical and mental health care for sexual abuse victims and abusers, to include tests for sexually transmitted infections as medically appropriate. Treatment would be at no costs to the inmates and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. There were no sexual abuse victims or abusers during the audit cycle. During interviews of medical and mental staff acknowledged inmates received treatment consistent with the community level of care.

### **§115.86 – Sexual Abuse Incident Reviews**

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

Indiana County Jail policies identifies the minimum members of the review team, and covers the process for sexual abuse incident reviews. Incident reviews by policy are to be done within 15 days of the investigation being completed. No incident reviews were required during the audit cycle. Incident review team members include the Warden, two Deputy Wardens, SGT, Counselor, Nurse Supervisor and Contracted Therapist. Interview of two of the team members demonstrated an understanding of the process and requirements. It is evident based on corrective action on sexual harassment cases that the Indiana County Jail leadership reviews PREA incidents with how could they have prevented it. A good example is the female shower area modifications completed based on a staff member using the cameras to observe female inmates in the showers.

#### **§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)

Indiana County Jail collects uniform data that provides the minimum data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice (DoJ).

During the on-site audit, Indiana County Jail did not obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates (115.87 (e)). Indiana County Jail needed to collect such data for 2014 and 2015 from its contracted facilities. During the corrective action period, Indiana County Jail received the data from the facilities it contracts to confine juveniles.

#### **§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)

Indiana County Jail reviews the data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies; and to identify problem areas and take corrective actions. During interviews of the Warden and PREA Compliance Manager, both stated there had not been any trends yet, though they did take some corrective action based on reviews of the investigations. The 2014 annual report was



published after the audit and posted on the Indiana County Jail web site. This was the first PREA report so there was no comparison with previous year numbers.

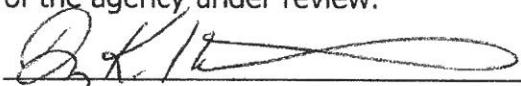
#### **§§115.89 – Data Storage, Publication, and Destruction**

- ☐ 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)

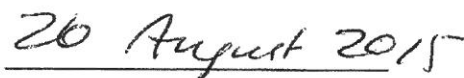
Based on Indiana County Jail policy, review of the website, and interviews of staff it is determined data collected pursuant to § 115.87 is properly stored, maintained and secured. Access to data is controlled. The agency had maintained its sexual abuse data collected pursuant to § 115.87 to date, which had not been ten years. Its data for 2014 is in the annual report posted on the Indiana County Jail website. It does not have contracted facility data, it will starting in 2015 (posted in 2016). The PREA section of the website is easily located and accessed.

#### **AUDITOR CERTIFICATION:**

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



Auditor Signature



Date