

# PREA Facility Audit Report: Final

**Name of Facility:** Lerdo Justice Facility

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 08/09/2025

## Auditor Certification

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.



I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.



**Auditor Full Name as Signed:** Valerie Wolfe Mahfood

**Date of Signature:** 08/09/2025

## AUDITOR INFORMATION

**Auditor name:** Mahfood, Valerie Wolfe

**Email:** wolfemahfood@aol.com

**Start Date of On-Site Audit:** 06/22/2025

**End Date of On-Site Audit:** 06/23/2025

## FACILITY INFORMATION

**Facility name:** Lerdo Justice Facility

**Facility physical address:** 17801 Industrial Farm Road, Bakersfield, California - 93308

**Facility mailing address:**

## Primary Contact

<b>Name:</b>	Jaime Hernadez
<b>Email Address:</b>	HernandezJA@Kernsheriff.org
<b>Telephone Number:</b>	(661) 391-7349

<b>Warden/Jail Administrator/Sheriff/Director</b>	
<b>Name:</b>	Luis Madera
<b>Email Address:</b>	MaderaL@Kernsheriff.org
<b>Telephone Number:</b>	661) 391-3130

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Facility Health Service Administrator On-site</b>	
<b>Name:</b>	Margaret Johnson
<b>Email Address:</b>	margaret.johnson@kernmedical.com
<b>Telephone Number:</b>	661) 391-3167

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	796
<b>Current population of facility:</b>	651
<b>Average daily population for the past 12 months:</b>	650
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>What is the facility's population designation?</b>	Men/boys

<b>In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see <a href="https://www.prearesourcecenter.org/standard/115-5">https://www.prearesourcecenter.org/standard/115-5</a>)</b>	
<b>Age range of population:</b>	18+
<b>Facility security levels/inmate custody levels:</b>	Minimum/Medium/Maximum
<b>Does the facility hold youthful inmates?</b>	No
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	84
<b>Number of individual contractors who have contact with inmates, currently authorized to enter the facility:</b>	189
<b>Number of volunteers who have contact with inmates, currently authorized to enter the facility:</b>	45

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Kern County Sheriff's Office
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	1350 Norris Road, Bakersfield, California - 93308
<b>Mailing Address:</b>	
<b>Telephone number:</b>	6613917850

<b>Agency Chief Executive Officer Information:</b>
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<b>Name:</b>	Cindy Cisneros
<b>Email Address:</b>	Cisnerosc@kernsheriff.org
<b>Telephone Number:</b>	661-3916919

### Agency-Wide PREA Coordinator Information

<b>Name:</b>	Ted Parker	<b>Email Address:</b>	parkertj@kernsheriff.org
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## Facility AUDIT FINDINGS

### Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

#### Number of standards exceeded:

5	<ul style="list-style-type: none"> <li>• 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</li> <li>• 115.13 - Supervision and monitoring</li> <li>• 115.18 - Upgrades to facilities and technologies</li> <li>• 115.53 - Inmate access to outside confidential support services</li> <li>• 115.83 - Ongoing medical and mental health care for sexual abuse victims and abusers</li> </ul>
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#### Number of standards met:

40
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Number of standards not met:	
0	

## POST-AUDIT REPORTING INFORMATION

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

## GENERAL AUDIT INFORMATION

### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-06-22
2. End date of the onsite portion of the audit:	2025-06-23

### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Just Detention International, Women's Center High Dessert

## AUDITED FACILITY INFORMATION

14. Designated facility capacity:	796
15. Average daily population for the past 12 months:	650
16. Number of inmate/resident/detainee housing units:	26
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

<b>23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	651
<b>25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	28
<b>26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	00
<b>27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	4
<b>28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	3
<b>29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	00
<b>30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	3

<b>31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b>	3
<b>34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b>	00 = A running count of this category of inmate is not tracked within the facility for the 12 months preceding the audit. The information is recorded and kept in individual offender files, but not tracked in a manner that an institutional list can be generated.
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
<b>36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b>	84
<b>37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	45



<b>38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	189
<b>39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b>	At the time of the onsite audit, there weren't any volunteers present. However, attempts were made to communicate with all volunteers who had emails on file with the facility. Of which, only one volunteer responded to the auditor's query.
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	
<b>40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	15
<b>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b>	<div> <input checked="" type="checkbox"/> Age </div> <div> <input checked="" type="checkbox"/> Race </div> <div> <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) </div> <div> <input checked="" type="checkbox"/> Length of time in the facility </div> <div> <input checked="" type="checkbox"/> Housing assignment </div> <div> <input checked="" type="checkbox"/> Gender </div> <div> <input checked="" type="checkbox"/> Other </div> <div> <input type="checkbox"/> None </div>
<b>If "Other," describe:</b>	Custody, Job Assignment, Program Activity, Physical Characteristics, Psychological Characteristics, Primary Language Spoken, or other distinguishing factors amongst population.

<b>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b>	Housing rosters
<b>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="checked" type="radio"/> Yes <input type="radio"/> No
<b>44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	No barriers to completing random interviews were noted.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	17
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	3

<b>48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	2
<b>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	2
<b>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b>	1
<b>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	4
<b>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b>	5
<b>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b>	0

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Reviewed facility documentation. All inmates interviewed were also asked if they were transgender, intersex, gay, lesbian, or bisexual. None of the inmates interviewed stated that they were transgender. Additionally, during random staff interviews, staff did not indicate that any transgender incarcerated persons were assigned to the facility.</p>
<p><b>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>1</p>
<p><b>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>5</p>
<p><b>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Reviewed facility documentation. Asked staff if inmates were placed in segregated housing for the risk of sexual victimization or for having alleged to have been a victim of sexual abuse. Asked all inmates who reported sexual abuse or sexual victimization if they had ever placed in segregated housing for the risk of sexual victimization or for having alleged to have been a victim of sexual abuse. Both staff and inmates responded in the negative. Reviewed current assignment rosters, as well as interviewed inmates having previously disclosed sexual abuse or having filed sexual abuse/harassment allegations to determine if said inmates had been placed in segregation for filing said allegations.</p>
<p><b>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>Only one incarcerated person assigned had file a sexual abuse allegation. Reviewed facility documentation, to include current housing rosters by name. All inmates interviewed were also asked if they had filed reports of sexual abuse while assigned to the facility. Only one of the inmates interviewed stated that they had filed any such reports.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>58. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>12</p>

<b>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b>	<input type="checkbox"/> Length of tenure in the facility <input type="checkbox"/> Shift assignment <input type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
<b>If "Other," describe:</b>	Gender, race, ethnicity, languages spoken, or other distinguishing factors amongst staff relative to their employment.
<b>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	No barriers to completing random staff interviews were noted.
<b>Specialized Staff, Volunteers, and Contractor Interviews</b>	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
<b>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b>	17
<b>63. Were you able to interview the Agency Head?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

<b>64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>65. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>66. Were you able to interview the PREA Compliance Manager?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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



	<input checked="" type="checkbox"/> Other
<b>If "Other," provide additional specialized staff roles interviewed:</b>	Laundry, Training Staff, Chaplain, and SAFE/ SANE staff associated with the local hospital/ rape crisis center
<b>68. Did you interview VOLUNTEERS who may have contact with inmates/ residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of VOLUNTEERS who were interviewed:</b>	1
<b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
<b>69. Did you interview CONTRACTORS who may have contact with inmates/ residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	3
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other

<b>70. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	At the time of the onsite audit, the weren't any volunteers present. However, attempts were made to communicate with all volunteers who had emails on file with the facility. Of which, only one volunteer responded to the auditor's query.
<b>SITE REVIEW AND DOCUMENTATION SAMPLING</b>	
<b>Site Review</b>	
<p>PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.</p>	
<b>71. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>Was the site review an active, inquiring process that included the following:</b>	
<b>72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No

<b>75. Informal conversations with staff during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b>	NA
<b>Documentation Sampling</b>	
<p>Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.</p>	
<b>77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b>	Additional document sampling was done both at random, as well as in coordination with comments received from inmates and staff during the interview process.
<b>SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY</b>	
<b>Sexual Abuse and Sexual Harassment Allegations and Investigations Overview</b>	
<p>Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.</p>	

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual abuse</b>	8	0	0	8
<b>Staff-on-inmate sexual abuse</b>	12	0	0	12
<b>Total</b>	20	0	0	20

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual harassment</b>	3	0	0	3
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	3	0	0	3

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual abuse</b>	1	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	1	0	0	0	0
<b>Total</b>	2	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	1	3	4	0
<b>Staff-on-inmate sexual abuse</b>	1	11	0	0
<b>Total</b>	2	14	4	0

### Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	1	2	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	0	1	2	0

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**

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

9

<b>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
<b>Inmate-on-inmate sexual abuse investigation files</b>	
<b>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b>	5
<b>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
<b>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
<b>Staff-on-inmate sexual abuse investigation files</b>	
<b>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b>	4
<b>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

<b>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
<b>Sexual Harassment Investigation Files Selected for Review</b>	
<b>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	3
<b>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
<b>Inmate-on-inmate sexual harassment investigation files</b>	
<b>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	2
<b>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
<b>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)



**Staff-on-inmate sexual harassment investigation files**

**98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:**

1

**99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?**

☒ Yes

☐ No

☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

**100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?**

☒ Yes

☐ No

☐ NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)

**101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.**

NA

**SUPPORT STAFF INFORMATION****DOJ-certified PREA Auditors Support Staff**

**102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.**

☐ Yes

☒ No

## Non-certified Support Staff

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

☐ Yes

☒ No

## AUDITING ARRANGEMENTS AND COMPENSATION

**108. Who paid you to conduct this audit?**

☐ The audited facility or its parent agency

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

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

☐ Other

**Identify the name of the third-party auditing entity**

Corrections Consulting Services (f/k/a PAOA)

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

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>Kern County Sheriff's Office (KCSO) A-0400, Introduction - Organizational Structure, 5-24-23</li> <li>Kern County Organizational Chart</li> </ul>

- KCSO Detentions Structure
- KCSO Incarcerated Person Roster, 6-22-25
- KCSO Detention Bureau Daily Count, 6-22-25
- KCSO Incarcerated Person Orientation Booklet, English, 7-11-24
- KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24

#### Interviews:

- Agency Head
- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Intermediate or Higher-Level Facility Staff
- Random Staff

#### Site Review Observations:

- The Kern County Sheriff's Office PREA Coordinator, along with the Lerdo Justice Facility PREA Compliance Manager, oversee the Lerdo Justice Facility PREA program.
- The Lerdo Justice Facility PREA Compliance Manager (PCM) is physically assigned to the Lerdo Justice Facility and maintains a permanent office, with routine activities, within the agency's complex grounds as a function of that assignment.

#### Standard Subsections:

(A) The Kern County Sheriff's Office (KCSO) has a policy; namely, Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24, that mandates zero tolerance toward all forms of sexual abuse and sexual harassment. Additionally, this policy outlines the agency's approach to preventing, detecting, and responding to such actions. As a function of this, the agency's policy is "committed to zero-tolerance of any form of sexual abuse and sexual harassment."

(B) The KCSO has employed and designated an upper-level agency-wide PREA Coordinator. As noted through discussions with said PREA Coordinator, this individual does have sufficient time and authority to further the agency mission of zero tolerance toward all forms of sexual abuse and sexual harassment. In excess of the PREA Standards, the KCSO has also allotted for the assignment of an agency-based PREA Compliance Manager, as well as facility-based PREA Compliance Managers at each facility within the Detentions Bureau. Per the P-100, Zero Tolerance of Sexual Abuse and Harassment policy, "in support of KCSO's zero-tolerance of sexual abuse of incarcerated people, a Detentions Bureau PREA Coordinator and Agency PREA Compliance Manager with sufficient authority to develop, implement, and oversee efforts to comply with the PREA standards have been designated. The Administrative Sergeant of each jail facility has been designated as a Facility PREA Compliance Manager to coordinate the PREA compliance efforts for their respective facilities." This agency-based PCM provides an additional level of supervision in developing, implementing, and overseeing KCSO's efforts to comply with the PREA Standards within all of its detention facilities.

(C) The KCSO operates multiple detention facilities. As such, each facility, to include the Lerdo Justice Facility, has designated a PREA Compliance Manager. Within the KCSO, this position is maintained by the facility-based Administrative Sergeant. The Lerdo Justice Facility Administrative Sergeant, herein referenced as the PREA Compliance Manager (PCM), has affirmed having sufficient time and authority to coordinate the facility's efforts to comply with the PREA Standards.

Reasoning & Findings Statement:

This standard establishes agency expectations of zero-tolerance for sexual abuse and sexual harassment of incarcerated persons. In developing these expectations, the KCSO has created specific policies to prevent, detect, and respond to allegations of sexual abuse and sexual harassment of incarcerated persons. The agency has designated an upper-level agency-wide PREA Coordinator to oversee its zero-tolerance program. In excess of the PREA Standards, the KCSO has also allotted for the assignment of an agency-based PREA Compliance Manager, who provides an additional level of supervision in developing, implementing, and overseeing agency efforts to comply with the PREA Standards in all of its detention facilities. Lastly, this standard requires that each facility within the agency, to include the Lerdo Justice Facility, has designated a PREA Compliance Manager. Within the KCSO, this position is maintained by the facility-based Administrative Sergeant of each jail. The Lerdo Justice Facility Administrative Sergeant, herein referenced as the PREA Compliance Manager (PCM), has affirmed having sufficient time and authority to coordinate the facility's efforts to comply with the agency's zero-tolerance policy. In doing this, the Lerdo Justice Facility has further developed its own facility-based coordinated

	response plan to ensure the agency’s overall zero-tolerance policy is applicable to any unique circumstances of the individual facility. In developing these mandatory positions and policies, the KCSO, and by extension the Lerdo Justice Facility, have exceeded the requirements of this standard.
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<b>115.12</b>	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff’s Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff’s Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff’s Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff’s Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• KCSO Contract with the U.S. Department of Justice, United States Marshals Service, #97-99-0196, 6-25-10</li> <li>• KCSO Contract with the U.S. Department of Justice, United States Marshals Service, #97-99-0196, 10-1-16</li> <li>• KCSO Contract with the U.S. Department of Justice, United States Marshals Service, #97-99-0196, 7-18-17</li> <li>• KCSO Contract with the U.S. Department of Justice, United States Marshals Service, #97-99-0196, 1-1-18</li> <li>• KCSO Contract with the U.S. Department of Justice, United States Marshals Service, #97-99-0196, 8-1-18</li> <li>• KCSO Contract with the U.S. Department of Justice, United States Marshals Service, #97-99-0196, 4-1-20</li> <li>• KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23</li> <li>• KCSO Contract with Keefe Commissary Network, Inc., 5-25-21</li> </ul>

- KCSO Contract with California Department of State Hospitals, 2-23-21
- Kern County and KCSO Contract with CCL Security, LLC., 2-1-24
- KCSO Contract with Kern County Hospital Authority, Medical Services Agreement, 10-25-22
- Kern County and KCSO Contract with Language Line Services, 5-28-24
- Kern County and KCSO Contract with Prison Ministries of America, 10-25-22
- Kern County and KCSO Contract with Kern County Forensic Services SART Center, 6-13-23
- KCSO Contract with Women’s Center High Desert, Inc., 4-22-24
- Kern County and KCSO Contract with Trinity Services Group, Inc., 8-9-22
- Kern County and KCSO Contract with Trinity Services Group, Inc., 8-22-23
- Kern County and KCSO Contract with Securus Technologies Inc., 5-8-18

Interviews:

- Agency PREA Coordinator
- Agency Contract Administrator

Site Review Observations:

- The Lerdo Justice Facility is a publicly operated detention facility through the Kern County Sheriff’s Office.

Standard Subsections:

(A) In accordance with P-300, Employee Training and Incarcerated Person Education, the “KCSO participates in a Kern County Community Consortium to reduce incarcerated person recidivism by placing incarcerated people in community-based organization (CBO) homes contracted with Kern Community Corrections Partnership.” However, as noted by the Agency Contract Administrator, the KCSO does not have any active contracts and is not currently housing any incarcerated persons outside of

	<p>the facility. However, it was further noted that should the KCSO every house incarcerated persons outside of the facility, the agency would require that all contracts for the confinement of KCSO incarcerated persons must include a provision that the contractors would adopt and comply with PREA standards.</p> <p>(B) The KCSO does not have any active contracts and is not currently housing any incarcerated persons assigned to the Lerdo Justice Facility outside of the facility. As such, there wasn't any (0) documentation to review.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard requires that all private entities contracting with the KCSO must comply with the PREA Standards. However, the KCSO does not have any active contracts and is not currently housing incarcerated persons assigned to the Lerdo Justice Facility outside of the facility. As such, there wasn't any (0) documentation to review. With this in mind, the KCSO, and by extension Lerdo Justice Facility, has satisfied all provisions within this standard.</p>
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<b>115.13</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• KCSO Jail Facility Staffing Plan Process</li> <li>• KCSO Lerdo Justice Facility Staffing Plan 2024, 7-26-24</li> <li>• KCSO Lerdo Justice Facility Staffing Plan 2025, 4-1-25</li> <li>• KCSO Lerdo Justice Facility A Module Building Log, 6-1-25</li> <li>• KCSO Lerdo Justice Facility B Module Building Log, 6-1-25</li> </ul>



- KCSO Lerdo Justice Facility C Module Building Log, 6-1-25
- KCSO Lerdo Justice Facility D Module Building Log, 6-1-25
- KCSO Lerdo Justice Facility Infirmary Building Log, 6-1-25
- KCSO Lerdo Justice Facility IRC Building Log, 6-1-25

Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Intermediate or Higher-Level Facility Staff
- Random Staff
- Random Inmates

Site Review Observations:

- All incarcerated person housing areas contain at least one security staff post that is continuously monitored by staff. All areas of high incarcerated person traffic are assigned permanent staffing positions while in operation.
- During the site review, supervisory staff were observed making routine and frequent rounds throughout the facility. All random staff interviewed did indicate that supervisory staff were available to them and routinely conducted unannounced rounds within the facility.
- During supervisory rounds, ranking officials were observed reviewing required documentation completed by line staff as a function of their duty posts.
- During the onsite portion of the audit, current Lerdo Justice Facility chronological building logs were inspected throughout the facility to ensure staff were conducting, and properly documenting, unannounced rounds and, where appropriate, opposite gender announcements. Supervisory signatures were observed in green or blue ink, depending on staff rank.
- All uniform staff wore body cameras.

Standard Subsections:

(A) As required by agency policy (P-200), "The Kern County Sheriff's Detentions Bureau shall maintain written staffing plans for each of its custodial facilities that will provide a safe and secure environment for both incarcerated people and staff. The staffing plans shall adhere to all state and local laws, regulations, standards, and generally accepted detention and correctional practices, with an emphasis on preventing and detecting sexual abuse, assault, or harassment of incarcerated people in accordance with federal Prison Rape Elimination Act standards. Each facility staffing plan shall consider all components of PREA Standard §115.11, including but not limited to facility structure, required daily operations, and the availability of any video monitoring equipment." As noted by the Lerdo Justice Facility PCM, the Lerdo Justice Facility operates in accordance with generally accepted detention and correctional practices. As a part of that process, the Kern County Sheriff's Office Detentions Bureau is inspected every two years by the California Board of State and Community Corrections. Lastly, a review of the Lerdo Justice Facility 2025 Staffing Plan indicates that the facility does consider:

- Adequate staffing levels
- Generally accepted detention and correctional practices
- Any judicial findings of inadequacy
- Any findings of inadequacy from Federal investigative agencies
- Any findings of inadequacy from internal or external oversight bodies
- All components of the facility's physical plant
- The composition of the incarcerated person population
- The number and placement of supervisory staff
- The institution programs occurring on a particular shift
- Any applicable State or local laws, regulations, or standards
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse
- Any other relevant factors

The Lerdo Justice Facility has developed a staffing plan so that adequate staffing levels are routinely available to ensure the custody and safety of all incarcerated persons housed within the facility. Since the last PREA Audit, the Lerdo Justice Facility has maintained an average of 650 incarcerated persons assigned to the facility. The

Lerdo Justice Facility staffing plan was predicated on having 796 incarcerated persons assigned to the facility. During interviews with random staff, said employees consistently remarked that supervisory staff were routinely conducting unannounced rounds and were available to them when needed. As well, interviews with incarcerated persons indicated that supervisory staff were routinely conducting unannounced rounds. Additionally, there weren't any (0) incarcerated persons who indicated that they were unable to attend routine activities on a regular basis due to a shortage of staff.

(B) Agency policy (P-200) requires that all "facility shift staffing schedules shall be prepared in accordance with the facility staffing plan. Any circumstances where the staffing plan is not complied with shall be documented in the facility Shift Supervisor logbook and in an e-mail sent to the incident of interest (IOI) email group at the end of the shift." During the audit time frame, the Lerdo Justice Facility has not deviated from the facility staffing plan. As noted by the Lerdo Justice Facility Administrator, if deviations were to occur, they would be documented as required.

(C) Per policy (P-200), "Each facility staffing plan shall be reviewed annually by the Section Manager and the PREA coordinator to assess any necessary adjustments to the staffing plan and the monitoring systems." As noted by the Lerdo Justice Facility Administrator, and confirmed by the KCSO PREA Coordinator, the Lerdo Justice Facility does conduct an annual assessment of its staffing plan. At that time, the facility/ agency does assess, determine, and document whether adjustments to the Lerdo Justice Facility staffing plan are necessary, the resources the facility has available to commit to ensure adherence to the staffing plan, as well as the facility's deployment of video monitoring systems and other monitoring technologies. A review of the Lerdo Justice Facility last staffing plan, dated April 1, 2025, does evidence adherence to this requirement.

(D) Agency policy (P-200) mandates that "KCSO normal operation procedures require facility supervisors to make unannounced supervisory checks of each post during each shift. The supervisory checks will be documented in the post logbook." The timing of the onsite portion of the audit allowed for the observation of staff from all shifts. In this, it was noted that unannounced rounds were properly documented by both line and supervisory staff. As well, numerous housing and officer station logs were reviewed onsite. These logs, which were documented by supervisors using green or blue ink, reflected a historic pattern of supervisory presence throughout the facility. Additionally interviews with supervisory staff confirm that unannounced rounds are being conducted as required for all shifts. These rounds are conducted at random, using different timing intervals, travel patterns, and other means to make the presence of supervisory staff less predictable. As required by policy (P-200) "except for work areas that are not operational during holidays or weekends, these inspections are required to be performed each day unannounced and at random

	<p>times by each shift supervisor.” Lastly, policy further dictates that “staff members are prohibited from alerting other staff that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility.” Interviews with random staff reflect their awareness of policy prohibiting them from notifying co-workers that said rounds are occurring. As well, interviews with random incarcerated persons all indicated that supervisors are routinely walking about the facility. During the onsite portion of the audit, it was further observed that both staff and incarcerated persons seemed comfortable with the presence of supervisory staff within department and housing areas; thus, further supporting the fact that supervisory staff are routinely present throughout the facility.</p> <p>Reasoning &amp; Findings Statement:</p> <p>The standard provides that adequate staffing levels are assessed and maintained, as well as video monitoring technology is used to its fullest potential to promote the safety of not only the incarcerated persons assigned to the facility, but also the well-being of all correctional employees, contractors, and volunteers within the compound. The Lerdo Justice Facility does conduct an annual assessment of its staffing levels, with the last assessment being finalized on April 1, 2025. During the audit time frame, the Lerdo Justice Facility has not deviated from its staffing plan. Supervisory staff note, as well as documentation confirms, that unannounced rounds are being conducted on a regular and routine basis. Both random staff and incarcerated persons agree that supervisor rounds are routinely conducted. Lastly, despite the Lerdo Justice Facility having an abundance of stationary video cameras throughout its institutional grounds, to take full advantage of monitoring technologies, uniform officers also wear body cameras attached to their shirts. As such, the Lerdo Justice Facility has clearly exceeded the compliance requirements of this standard.</p>
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115.14	Youthful inmates
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ul style="list-style-type: none"><li>• Kern County Sheriff’s Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li><li>• Kern County Sheriff’s Office, P-400, Vulnerable PREA Incarcerated People Population, 7-11-24</li></ul>

Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Random Staff
- Random/Targeted Inmates

Site Review Observations:

- While conducting the onsite review, the auditor did not observe any incarcerated persons who appeared excessively youthful.
- In reviewing incarcerated person documents, the auditor did not observe any birthdays to be less than 18 years before the date of the onsite review.
- All incarcerated persons interviewed stated that they were at least 18 years of age and/or did not have any knowledge of any incarcerated person assigned to the Lerdo Justice Facility who was not at least 18 years of age.

Standard Subsections:

(A) In accordance with agency policy (P-400), the "KCSO will not knowingly book or detain persons under the legal age of eighteen. Incarcerated people determined after booking and/or housing to be juveniles shall be transferred to an appropriate juvenile facility. Incarcerated people claiming to be juveniles shall be given the opportunity to verify their age through legal documentation either from their property or so presented by a family member. Incarcerated people determined to be juveniles shall immediately be moved to a location away from sight and sound of adult incarcerated people. Security staff shall continuously monitor the juvenile by direct supervision, until transfer to an appropriate juvenile facility or release by court order can be performed." The Lerdo Justice Facility PCM confirmed adherence to agency policy. As well, interviews with incarcerated persons did not suggest that the facility ever housed persons under the age of eighteen years. Lastly, documentation review did not indicate that any incarcerated persons assigned to the Lerdo Justice Facility were less than eighteen years of age.

	<p>(B) In accordance with agency policy (P-400), if an incarcerated person is determined to be a juvenile, that person “shall immediately be moved to a location away from sight and sound of adult incarcerated people. Security staff shall continuously monitor the juvenile by direct supervision, until transfer to an appropriate juvenile facility or release by court order can be performed.” The Lerdo Justice Facility PCM confirmed adherence to agency policy. As well, interviews with incarcerated persons did not suggest that the facility ever housed persons under the age of eighteen years. Lastly, documentation review did not indicate that any incarcerated persons assigned to the Lerdo Justice Facility were less than eighteen years of age.</p> <p>(C) In accordance with agency policy (P-400), the “KCSO will not knowingly book or detain persons under the legal age of eighteen.” Hence, the Lerdo Justice Facility has not denied any incarcerated persons less than 18 years of age the ability to engage in daily large-muscle exercise or to participate in other programs or work opportunities due to said placement. The Lerdo Justice Facility PCM confirmed adherence to agency policy. As well, interviews with incarcerated persons did not suggest that the facility ever housed persons under the age of eighteen years. Lastly, documentation review did not indicate that any incarcerated persons assigned to the Lerdo Justice Facility were less than eighteen years of age.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard requires that the agency ensures sight and sound separation between incarcerated persons less than 18 years of age and incarcerated persons more than 18 years of age. Alternatively, the standard requires that there is direct staff supervision when incarcerated persons less than 18 years of age and incarcerated persons more than 18 years of age have the possibility of sight, sound, or physical contact. The Kern County Sheriff’s Office, and by extension, the Lerdo Justice Facility, will not knowingly book or detain persons under the legal age of eighteen. Hence, agency policy prohibits the assignment of incarcerated persons less than 18 years of age to the Lerdo Justice Facility. If an incarcerated person is determined to be a juvenile, that person is immediately moved to a location away from sight and sound of adult incarcerated people. Security staff would then continuously monitor the juvenile by direct supervision, until transfer to an appropriate juvenile facility or release by court order can be performed. This given, the Lerdo Justice Facility has met the requirements of this standard.</p>
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<b>115.15</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard

## **Auditor Discussion**

### Documents:

- Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24
- Kern County Sheriff's Office, C-550, Strip And Body Cavity Search, 7-11-24
- Kern County Sheriff's Office, Gender Search Preference
- Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24
- Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24

### Interviews:

- Facility Administrator
- PREA Compliance Manager
- Intermediate or Higher-Level Facility Staff
- Random Staff
- Random Inmates
- Inmates Who Identify as Lesbian, Gay, Bisexual, Transgender, or Intersex

### Site Review Observations:

- During the onsite inspection, staff were routinely observed making cross-gender announcements when persons of the opposite gender entered incarcerated person housing areas.
- Supervisory staff were observed conducting their routine security checks within incarcerated person housing areas. Cross-gender announcements and supervisory rounds, both unannounced rounds and scheduled rounds, were subsequently documented on chronical activity logs.
- Privacy shields were in place inhibiting view into all incarcerated person toilets.

- Privacy shields were observed and/or available in medical examination rooms.
- Privacy curtains were observed in all shower areas.
- Video surveillance was not trained to areas where incarcerated persons might routinely be in a state of undress.

Standard Subsections:

(A) Agency policy (C-550) requires that “strip searches and/or visual body cavity searches will be conducted by a staff member of the same sex as the incarcerated person being searched. Staff members of the opposite sex will not be allowed to view the strip search.” As noted by the Lerdo Justice Facility PCM, there has not been any cross-gender strip or cross-gender visual body cavity searches conducted during the audit time frame. Both interviews with random staff and incarcerated persons confirmed that staff do not conduct such searches.

(B) The Lerdo Justice Facility is permitted to house incarcerated persons who are either biologically male or female. At the time of the onsite audit, there weren’t any biological females assigned to the facility. Nonetheless, agency policy (C-550) requires that “strip searches and/or visual body cavity searches will be conducted by a staff member of the same sex as the incarcerated person being searched. Staff members of the opposite sex will not be allowed to view the strip search.” Interviews with random staff confirm adherence to agency policy (C-550) prohibiting cross-gender pat-down searches of either male or female incarcerated individuals, absent exigent circumstances. Agency policy (C-550), however, allows that “with the exception of the circumstances listed below, staff will not subject any incarcerated person to a strip search or visual body cavity search unless a peace officer has determined that: there is reasonable suspicion, based on specific and articulable facts, to believe the arrestee is concealing a weapon or contraband; and that a strip search or visual body cavity search is reasonably likely to result in discovery of the weapon or contraband; and the deputy has obtained the shift supervisor’s written authorization.”

(C) Agency policy (C-550) requires that “all authorized strip searches and/or visual body cavity searches that are conducted based on reasonable suspicion will be documented in a JMS incident report.” While staff at the facility have not engaged any cross-gender strip searches of its incarcerated persons during the audit time frame, all random staff interviewed understood that under exigent circumstances, should the need arise, such searches would require justification. Since the Lerdo Justice Facility does not currently house female incarcerated persons, and no female incarcerated persons have ever been subject to a cross-gender search within the audit time frame,



there isn't any documentation to review.

(D) Agency policy (P-200) requires that "incarcerated people will be able to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks." During the onsite portion of the audit, inspections were conducted of all areas where incarcerated persons might routinely be expected in a state of undress. It was noted that all such areas allowed for modesty barriers to inhibit opposite gender viewing of the breasts, buttocks, or genitalia of incarcerated persons, except in exigent circumstances or when such viewing is incidental to routine cell checks. Agency policy (P-200) further requires that "when entering an opposite sex housing unit (Male deputy entering female housing or female deputy entering male housing), deputies are required to announce their presence, have their presence announced or otherwise ensure incarcerated people are informed they will be or are entering the housing unit." During the onsite portion of the audit, opposite gender announcements were observed. During random staff interviews, all staff confirmed their routine use of opposite gender announcements. Interviews with incarcerated persons supported staff adherence to agency policy. Lastly, a review of video surveillance throughout the facility found that cameras were not trained to areas where incarcerated persons would routinely be in a state of undress.

(E) Agency policy (C-550) mandates that "transgender or intersex incarcerated people will be strip searched by staff of the gender indicated on their Gender Search Preference Form. Staff members of the gender not indicated on an incarcerated person's Gender Search Preference Form will not be allowed to view the strip search." In interviewing random staff, it was clearly expressed that if the gender of incarcerated persons is unknown, conducting strip searches to determine their genital status would be inappropriate. Rather, random staff generally expressed that to determine gender they would contact the medical department, their supervisor, reference agency documents, or simply ask the incarcerated person. In interviewing incarcerated persons, there weren't any (0) transgender, intersex, gay, lesbian, or bisexual incarcerated persons who stated that they had ever been searched or physically examined for the sole purpose of determining their genital status.

(F) Agency policy (P-300) dictates that "security staff employees will be trained in how to conduct cross-gender pat-down searches during exigent circumstances and how to conduct searches of transgender and intersex incarcerated people, in a professional and respectful manner and in the least intrusive manner possible, consistent with security needs." Furthermore, agency policy (C-550) provides clear instructions on how staff will perform searches of any incarcerated person, to include transgender persons. During interviews, all random staff affirmed their obligation to conduct searches in a professional manner and only for security purposes. Facility

	<p>documentation reflects that 100% of Lerdo Justice Facility security staff have been trained on conducting said searches in a professional and least intrusive manner as possible consistent with security needs.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard places limits on cross-gender searches, to include pat-downs, strip searches, and visual body cavity searches. The KCSO has developed agency-wide policies prohibiting cross-gender pat searches of all incarcerated persons, as well as cross-gender strip searches and visual body cavity searches of all incarcerated persons in the absence of exigent circumstances. If exigent circumstances arise that require staff to engage in cross-gender strip or visual body cavity searches, policy subsequently requires these searches to be properly documented. It should be noted, however, that during the audit time frame, the Lerdo Justice Facility has not engaged in any cross-gender strip or visual body cavity searches. When same-sex strip searches and visual body cavity searches are performed of transgender and intersex incarcerated persons, the agency further requires staff to ensure professionalism and to utilize the least intrusive manner possible consistent with security needs. Interviews with both random staff and incarcerated persons confirmed that staff do not conduct either cross-gender strip searches or cross-gender visual body cavity searches. Lastly, facility records reflect that all security staff have been trained on the proper procedures for conducting pat searches on transgender or intersex incarcerated persons, which require said searches to be performed in a professional and least intrusive manner as possible. This standard further places limits on opposite gender viewing of incarcerated persons' breasts, buttocks, and genitalia. During onsite observations of the facility, there weren't any (0) areas of the facility identified as not having, or otherwise missing, modesty barriers to inhibit opposite gender viewing of incarcerated persons in areas where it is expected that they may be in a state of undress. An extensive review of live video surveillance demonstrates that cameras are not trained in areas where incarcerated persons would routinely be in a state of undress. Lastly, to ensure all incarcerated persons are given the utmost in modesty protection, the agency requires opposite gender staff to announce their presence upon entering housing areas where incarcerated persons may be in a state of undress. Given the Lerdo Justice Facility adherence to all provisional requirements, this facility has clearly met the requirements of this standard.</p>
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<b>115.16</b>	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Documents:

- Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24
- Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24
- Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24
- Kern County Sheriff's Office, P-600, PREA Criminal and Administrative Investigations, 7-11-24
- KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23
- Kern County and KCSO Contract with Language Line Services, 5-28-24
- KCSO Language Line Solutions Language Identification Guide
- KCSO Language Line Solutions Interpretation Services Available
- KCSO Detentions Bureau Prisoner Information Brochure, English
- KCSO Detentions Bureau Prisoner Information Brochure, Spanish
- KCSO Incarcerated Person Orientation Booklet, English, 7-11-24
- KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24
- KCSO Incarcerated Person Acknowledgement of Grievance Procedure, English, 7-11-24
- KCSO Incarcerated Person Acknowledgement of Grievance Procedure, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Information Sheet, English
- KCSO Detentions Bureau PREA Information Sheet, Spanish
- KCSO Detentions Bureau PREA Information Sheet, Braille
- KCSO Detentions Bureau PREA Awareness Poster, English
- KCSO Detentions Bureau PREA Awareness Poster, Spanish
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, English, 7-8-22
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, Spanish, 7-8-22

- KCSO Detentions Bureau PREA Holding Cell Risk Questions, English, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, English, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, Spanish, 7-11-24
- KCSO Incarcerated Person PREA Training Video, English
- KCSO Incarcerated Person PREA Training Video, Spanish
- KCSO PREA Inmate Education / Orientation Roster, English
- KCSO PREA Inmate Education / Orientation Roster, Spanish

#### Interviews:

- Agency Head
- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Intermediate or Higher-Level Facility Staff
- Random Staff
- Random Inmates
- Inmates with Disabilities
- Inmates with Limited English Proficiency

#### Site Review Observations:

- Correctional staff assigned to housing areas entered each area within the building to loudly announce information, to include when opposite gender staff entered the housing area.
- PREA Notices, as well as other advisement notices, were posted in languages spoken by significant portions of the incarcerated person population; namely English

and Spanish.

- Language Line Solutions Interpretation Services are available for staff to communicate with incarcerated persons who do not speak English.
- Staff translators are also available if needed.
- Observed KCSO's Incarcerated Person PREA Educational Video, which was available in English and Spanish.

Standard Subsections:

(A) KCSO policy (P-300) requires the Lerdo Justice Facility to "provide incarcerated person education in formats accessible to all incarcerated people, including those who are limited English proficient, deaf, visually impaired or otherwise disabled, as well as to incarcerated people who have limited reading skills. In fact, the KCSO policy (P-300) states that "medical or mental health staff will help an incarcerated person with a disability understand intake or comprehensive information if the incarcerated person's disability or impairment prevents them from understanding such material." With that in mind, the KCSO has developed agency-wide procedures and training aids to enhance communication efforts with disabled incarcerated persons; such as those with hearing, vision, speech, or other physical disabilities; psychiatric or other intellectual disabilities, or those with limited English proficiency; so as to provide these incarcerated persons with an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. PREA educational information is provided in writing, verbally, as well as presented in video format (available in English and Spanish). The Lerdo Justice Facility maintains a mandatory for use contract for translation and interpretation services to assist incarcerated persons who do not speak a language common to Lerdo Justice Facility staff. This translations service can be used to translate PREA, as well other confidential information, into any language spoken by any incarcerated person. In speaking with random staff, as well as interviews with other staff, all demonstrated the need for staff to obtain qualified interpreters for all security sensitive concerns, including the translation of PREA related matters. Additionally, all staff were aware that incarcerated persons could not be used to translate during a sexual abuse or sexual harassment investigation or alleged incident. During the audit time frame, there have not been any (0) instances of Lerdo Justice Facility staff using incarcerated person interpreters for PREA related matters. Incarcerated persons with disabilities, to include those with limited English proficiency, were also interviewed. These persons all stated that their disabilities either did not prevent them from understanding and having the subsequent ability to access the facility's PREA program or that the facility had made accommodations for their disabilities.

(B) The KCSO has taken meaningful steps to ensure that incarcerated persons with limited English proficiency can benefit from its efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Most significantly, the agency has provided all PREA related literature, as well as the PREA informational video, in both English and Spanish, with Spanish being the primary language spoken by most incarcerated persons outside of English. The agency has also engaged a mandatory use contract for translation and interpretation services for any incarcerated person who does not speak English. As demonstrated during the onsite portion of the audit, these interpreters can interpret effectively, accurately, and impartially, both receptively and expressively, using necessary specialized vocabulary to understand and articulate specific points of conversation between the auditor and incarcerated persons with limited English proficiency.

(C) Agency policy (P-600) requires that all sexual abuse and sexual harassment "investigations shall be conducted utilizing standard investigation methods in accordance with all laws." Accordingly, as noted by the facility investigator, interpretation services for sexual abuse or sexual harassment allegations may be provided only by qualified staff members or contract interpreters. As discussed during random staff interviews, Lerdo Justice Facility staff indicated that at no time would another incarcerated person be used to translate allegations of sexual abuse or sexual harassment. Furthermore, as noted by the Lerdo Justice Facility PCM, the facility has not relied on incarcerated persons to interpret in response to allegations of sexual abuse or sexual harassment. Accordingly, there isn't any facility documentation for any such incidents to review.

#### Reasoning & Findings Statement:

The standard provides that all incarcerated persons assigned to the Lerdo Justice Facility, to include those with disabilities and limited English proficiency, can benefit from the agency's efforts to prevent, detect, and respond to incidents of sexual abuse and sexual harassment. Hence, it is necessary for the agency to provide additional measures to ensure incarcerated persons with disabilities; either cognitive, physical, or cultural, have equal access to PREA information, programs, and support services relative to those affected by sexual abuse and sexual harassment. The KCSO recognizes this need and has created procedures and policy to address it. To ensure persons with disabilities and limited English proficiency have equal access to the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, the agency routinely stocks PREA informational brochures, as well as shows the PREA informational video in English and Spanish, the most commonly spoken language at the Lerdo Justice Facility outside of English. Additionally, via its language line services, the Lerdo Justice Facility offers this information to all incarcerated persons in their primary language. Lastly, it should be noted that at no time within the audit time frame, has Lerdo Justice Facility used incarcerated persons

	as interpreters to help agency staff communicate with other incarcerated persons regarding allegations of sexual abuse or sexual harassment. Rather, when needed, qualified staff or contract interpreters are used. Accordingly, the Lerdo Justice Facility has met all requirements of this standard.
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<b>115.17</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-900, PREA Hiring, Promoting and Discipline, 7-11-24</li> <li>• KCSO Statement of Receipt, Required County Policies: 8-20-23, 9-1-23, 9-5-23, 10-19-23, 12-11-23, 2-12-24, 2-29-24, 3-3-24, 5-28-24, 7-10-24, 8-16-24, 10-1-24, 10-15-24, 2-4-25</li> <li>• KCSO PREA Awareness Letter: 3-10-19, 6-17-20, 9-25-21, 10-15-21, 6-14-22, 2-22-23, 7-11-23, 10-1-24, 2-4-25</li> <li>• KCSO PREA Promotional Questionnaire: 3-5-21, 9-1-22a, 9-1-22b, 6-9-23, 8-1-24</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Administrative (Human Resources) Staff</li> <li>• Agency PREA Coordinator</li> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> </ul> <p>Site Review Observations:</p>

- Review of employee/contractor files onsite for required PREA/criminal background documentation.
- Review of Lerdo Justice Facility background investigation database

Standard Subsections:

(A) Agency policy (P-900) notes that the “KCSO has multiple procedures in place to facilitate the hiring, retention, or promotion of employees. Procedures are in place that require KCSO to decline or terminate the services of any contractor or volunteer who has been convicted of sexual abuse or sexual harassment, or who has a civil or administrative adjudication against them for sexual abuse or sexual harassment.” As noted by the KCSO Human Resource staff, the agency has developed policies to prohibit the hiring or promotion of employees and contracted workers who have engaged in sexual abuse, been convicted of engaging or attempting to engage in a sexual activity with incarcerated persons, or have been civilly or administratively adjudicated to have engaged in a sexual activity with incarcerated persons while in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution. KCSO Human Resource staff also note that the agency has policies that stipulate prior to all hiring and promotional decisions of employees and contract workers, any incidents of sexual harassment will be considered. Prior to hiring any new employee or contract worker at the facility level, Lerdo Justice Facility Human Resource staff do ensure that criminal background checks have been conducted on the prospective employee. As well, as noted by Lerdo Justice Facility Human Resource staff, any previous criminal justice institutions of employment are contacted to determine if candidates have any previously substantiated claims of sexual abuse or resigned during a pending investigation of such claims. Conversely, policy also requires that the Lerdo Justice Facility cooperates with other correctional and law enforcement agencies to ensure that accurate information regarding PREA related employment laws are effectively shared between agencies. Employee and contractor files were reviewed onsite to confirm adherence to the agency policy.

(B) Agency policy (P-900) notes that the “KCSO has multiple procedures in place to facilitate the hiring, retention, or promotion of employees. Procedures are in place that require KCSO to decline or terminate the services of any contractor or volunteer who has been convicted of sexual abuse or sexual harassment, or who has a civil or administrative adjudication against them for sexual abuse or sexual harassment.” In speaking with the KCSO Human Resource representative, agency policy requires Human Resource staff to verify contractor employment history. Employee and contractor files were reviewed onsite to confirm adherence to agency policy.



(C) Agency policy (P-900) notes that the “KCSO shall not hire, promote, or contract with anyone who has engaged, or attempted to engage in sexual abuse in a penal institution or who has been convicted of engaging in non-consensual sexual activity accomplished by force, threats, or other forms of coercion. KCSO shall not hire, promote, or contract with anyone who has a civil judgment or administrative adjudication against them for engaging or attempting to engage in non-consensual sexual activity accomplished by force, threats, or other forms of coercion.” Furthermore, policy (P-900) mandates that the “KCSO contacts prior employers to learn of any past performance, behavior, or legal issues that could be deemed disqualifying for employment, including substantiated allegations or resignations while an investigation is pending.” Within the audit time frame, Lerdo Justice Facility has hired employees who may have contact with incarcerated persons. KCSO Human Resource staff did confirm that all such persons received a criminal records background check prior to working at the facility. Employee files were reviewed onsite to confirm adherence to agency policy.

(D) Agency policy (P-900) notes that the “KCSO shall not hire, promote, or contract with anyone who has engaged, or attempted to engage in sexual abuse in a penal institution or who has been convicted of engaging in non-consensual sexual activity accomplished by force, threats, or other forms of coercion. KCSO shall not hire, promote, or contract with anyone who has a civil judgment or administrative adjudication against them for engaging or attempting to engage in non-consensual sexual activity accomplished by force, threats, or other forms of coercion.” Within the audit time frame, Lerdo Justice Facility has hired contractors who may have contact with incarcerated persons. KCSO Human Resource staff did confirm that all such persons received a criminal records background check prior to working at the facility. Contractor files were reviewed onsite to confirm adherence to agency policy.

(E) Once employed, agency policy (P-900) notes that the “KCSO is a subscriber to both DOJ and FBI’s fingerprint alert system. For the duration of their employment, KCSO will receive notification of any arrest and the charges against any employee or contractor.” Per Human Resource staff, employees also have an affirmative duty to report any contact they may have had with other law enforcement agencies and to report any sexual misconduct they may have been found guilty of at any other institution. Furthermore, employees are made aware that failing to provide this information, or providing false information regarding sexual misconduct, is grounds for employee discipline, to include termination of employment. A review of Lerdo Justice Facility’s current background investigation spreadsheet reflects that all persons working at the Lerdo Justice Facility have received their initial criminal background check, as well as, where applicable, required subsequent checks within the required time frame. Employee files were reviewed onsite to confirm adherence to agency policy.

	<p>(F) Agency policy (P-900) requires that “KCSO will impose on its employees a continuing affirmative duty to disclose any misconduct that may disqualify an applicant from employment or that may merit discipline of an employee. This includes written applications, personal history statements, interviews for hiring and/or promotions, and written self-evaluations.” As discussed with Human Resource staff, the KCSO does impose a continuing affirmative duty on all employees to disclose any misconduct found within Section A of this standard. Employee and contractor files were reviewed onsite to confirm adherence to agency policy.</p> <p>(G) Agency policy (P-900) expressly advises employees that “material omissions regarding such misconduct or the provision of materially false information shall be grounds for termination.” In speaking with Human Resource staff, adherence to this policy was confirmed.</p> <p>(H) Agency policy (P-900) allows that “unless prohibited by law, KCSO will provide prospective employers information regarding substantiated allegations of sexual abuse or sexual harassment involving a present or former employee.” In speaking with Human Resource staff, adherence to this policy was confirmed.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard requires the agency, and by extension the facility, to consider the sexual safety of incarcerated persons in all hiring and promotion decisions within the agency. The agency has numerous policies in place to ensure that end. As well, the Lerdo Justice Facility Human Resource Department has developed standardized tracking methods to ensure timely reviews, and subsequent reviews, of applicants and continuing employees/contractors are conducted as required. Review of employee and contractor training files reflect that the Lerdo Justice Facility Human Resource Department complies with agency policy. As such, the Lerdo Justice Facility clearly meets the requirements of this standard.</p>
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115.18	Upgrades to facilities and technologies
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	Documents:

- Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24
- KCSO Lerdo Justice Facility Staffing Plan 2024, 7-26-24
- KCSO Lerdo Justice Facility Staffing Plan 2025, 4-1-25

Interviews:

- Agency Head
- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager

Site Review Observations:

- Observed video monitoring technologies present within the facility.
- Reviewed live video surveillance across the facility.
- Observed body worn cameras on uniform correctional staff.

Standard Subsections:

(A) Per the Lerdo Justice Facility PCM, the Lerdo Justice Facility has not acquired a new facility or made any substantial expansion or modification to the existing facility since the last PREA audit. However, as noted by the Lerdo Justice Facility Administrator, the agency would consider the effect of the design, acquisition, expansion, and modification upon the agency's ability to protect incarcerated persons from sexual abuse and sexual harassment.

(B) Per the Lerdo Justice Facility PCM, the Lerdo Justice Facility has updated the video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit. Specifically, the facility has significantly increased the number of cameras available throughout the facility, as well as their capabilities. Additionally, as observed during the onsite portion of the audit, all uniform staff now

	<p>have body worn cameras attached to their shirts.</p> <p>Reasoning &amp; Findings Statement:</p> <p>The Lerdo Justice Facility has not made a substantial expansion or modification to the existing facility since the last PREA audit. As a part of the annual staffing review, the effective use of all current video monitoring devices, as well as the potential benefits of adding additional monitoring devices, is always considered. Exceeding the requirements of this standard, the agency, and by extension the Lerdo Justice Facility, also equipped all uniformed staff with body worn cameras. In all staffing decisions, as well as decisions involving the use of video monitoring technology, to include the use of individualized body worn cameras by correctional staff, the Lerdo Justice Facility has sought to maximize its ability to protect incarcerated persons from sexual abuse and sexual harassment. As such, the agency, and by extension the Lerdo Justice Facility, has exceeded the requirements for this standard.</p>
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<b>115.21</b>	<b>Evidence protocol and forensic medical examinations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-600, PREA Criminal and Administrative Investigations, 7-11-24</li> <li>• Kern County and KCSO Contract with Kern County Forensic Services SART Center, 6-13-23</li> <li>• KCSO Contract with Kern County Hospital Authority, Medical Services Agreement, 10-25-22</li> <li>• KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23</li> </ul>

- KCSO Contract with Women’s Center High Desert, Inc., 4-22-24
- KCSO California Penal Codes and CIIIS Codes Used in a Prison Rape Allegation, 2025
- KCSO SANE Location and Appointment Contact, 2025
- KCSO SART Exams Contacts, 2025
- KCSO PREA Resource Flow Chart, 8-10-18
- KCSO PREA Incident Data Tracker, 2024-2025

Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Investigative Staff
- Random Staff
- Medical Staff
- Mental Health Staff
- SAFE and/or SANE Personnel of the Local Hospital/Rape Crisis Clinic
- Community-Based Victim Advocacy Staff
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Observed Medical Department and privacy screens/limitations.
- Observed interview rooms and protocol for confidential interviews.

Standard Subsections:

(A) Agency policy (P-500) notes that “the Kern County Sheriff’s Office (KCSO) Detentions Bureau has developed a sexual abuse / assault response plan, which provides an appropriate response to incidents of sexual abuse, assault, harassment, or retaliation occurring in KCSO’s facilities.” While investigating allegations of sexual abuse, the agency does follow a uniform evidence protocol to maximize the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. As noted by the agency investigator, the KCSO maintains strict adherence to evidence collection protocols. As well, a review of documented investigations reflects the agency’s adherence to said requirements.

(B) Agency policy (P-550) provides strict guidance on the collection of forensic evidence. As noted by the agency investigator and PCM, all evidence is collected in accordance with agency protocols. As well, a review of documented investigations reflects the agency’s adherence to said requirements.

(C) Agency policy (P-550) requires staff to “offer all victims of sexual abuse access to forensic medical examinations at an approved contracted hospital providing evidentiary or medically appropriate care. The examinations will be performed by a Sexual Assault Nurse Examiner (SANE).” Agency policy (P-550) further notes that “KCSO shall provide free community level medical and behavioral health services to all sexual abuse victims with or without cooperation in any subsequent investigation.” Interviews with investigative and medical staff confirm adherence to agency policy specific to the availability of SAFE/SANE staff. A review of documented investigations reflects the agency’s adherence to said requirements. The facility utilizes the Kern County Forensic Services SART Center for forensic exams. Within the audit time frame, the Lerdo Justice Facility has facilitated two (2) such exams.

(D) Agency policy (P-550) notes that the “KCSO contracts with a provider of professional rape crisis advocate counseling services for incarcerated people sexually abused or assaulted during incarceration.” The Lerdo Justice Facility has a memorandum of understanding (MOU) with a local rape crisis center, the Women’s Center High Desert, to provide victim advocate services for incarcerated persons. The MOU ensures that a victim advocate from this rape crisis center is available to provide victim advocate services at all times. In speaking with advocates from the Women’s Center High Desert, their accessibility to the facility was confirmed. As noted by the PCM, there are sufficient victim support advocates contracted with the Lerdo Justice Facility to ensure adequate coverage of facility needs. As well, an interview with a victim advocate supports this assertion.

(E) Agency policy (P-550) allows that “per KCSO’s victim advocate agreement, the victim advocate shall accompany and support the victim through the forensic medical

examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals, as requested by the victim.” An interview with a victim advocate supports the facility’s compliance with this policy.

(F) Agency policy (P-600) mandates that “the Kern County Sheriff’s Office (KCSO), as a law enforcement agency shall promptly, thoroughly, and objectively investigate all reports of incarcerated person sexual assault, abuse, harassment, or retaliation occurring in its custodial facilities, including third-party and anonymous reports.” Interviews with the agency investigator and the facility PCM confirm adherence with this policy. A review of investigative documentation onsite also supports agency compliance.

(G) The auditor is not required to audit this provision.

(H) As noted by the KCSO PREA Coordinator, the Lerdo Justice Center always uses a trained victims’ advocate from a local rape crisis center as victim advocates in allegations of sexual abuse and sexual harassment. As well, through a memorandum of understanding with the local rape crisis center, the Women’s Center High Desert, the agency has ensured that all persons who have contact with incarcerated persons assigned to the Lerdo Justice Facility have been appropriately screened and trained, along with having received education concerning sexual assault and forensic examination issues in general.

#### Reasoning & Findings Statement:

This standard concerns evidence protocol and forensic medical examinations. The KCSO, and by extension the Lerdo Justice Facility, has numerous policies in place to ensure proper accountability during evidence collection and the forensic exam process. During the audit time frame, the Lerdo Justice Facility initiated the evidence protocol and forensic medical examination process twice (2). As evidenced during the interview process, facility staff are aware of the policies and procedures required of sexual abuse investigations. As well, Lerdo Justice Facility staff have standard practices in place to ensure the proper flow of the evidence collection process. Lastly, a MOU is in force between the Lerdo Justice Facility and the Women’s Center High Desert to ensure that incarcerated persons are always afforded access to a local rape crisis center advocate. With all these factors in mind, the Lerdo Justice Facility has met the requirements of this standard.

115.22	Policies to ensure referrals of allegations for investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-600, PREA Criminal and Administrative Investigations, 7-11-24</li> <li>• KCSO Contract with Kern County Hospital Authority, Medical Services Agreement, 10-25-22</li> <li>• Kern County and KCSO Contract with Kern County Forensic Services SART Center, 6-13-23</li> <li>• KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23</li> <li>• KCSO Contract with Women's Center High Desert, Inc., 4-22-24</li> <li>• KCSO PREA Incident Data Tracker, 2024-2025</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Agency Head</li> <li>• Agency PREA Coordinator</li> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> <li>• Investigative Staff</li> <li>• Medical Staff</li> <li>• Mental Health Staff</li> <li>• SAFE and/or SANE Personnel of the Local Hospital/Rape Crisis Clinic</li> </ul>



- Community-Based Victim Advocacy Staff
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Observed Medical Department and privacy screens/limitations.

Standard Subsections:

(A) Policy (P-600) requires that administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. Specifically, P-600 requires that "The Kern County Sheriff's Office (KCSO), as a law enforcement agency shall promptly, thoroughly, and objectively investigate all reports of incarcerated person sexual assault, abuse, harassment, or retaliation occurring in its custodial facilities, including third-party and anonymous reports." Per the Lerdo Justice Facility Investigator, any allegations received are investigated. During the audit time frame, the Lerdo Justice Facility received twenty-three (23) allegations of sexual abuse and sexual harassment. Documentation review reflects all allegations were investigated in accordance with policy.

(B) Agency policy (P-600) requires that "the Kern County Sheriff's Office (KCSO), as a law enforcement agency shall promptly, thoroughly, and objectively investigate all reports of incarcerated person sexual assault, abuse, harassment, or retaliation occurring in its custodial facilities, including third-party and anonymous reports." Per the Lerdo Justice Facility Investigator, any allegations received are investigated. Per the PCM, the KCSO, a law enforcement agency, has published its policy to investigate all allegations of sexual abuse and sexual harassment on its agency website. A review of the agency website confirmed this publication.

(C) This provision is not applicable as the agency is responsible for conducting its own criminal investigations.

(D) The auditor is not required to audit this provision.

(E) The auditor is not required to audit this provision.

	<p>Reasoning &amp; Findings Statement:</p> <p>This standard requires the proper investigation of all allegations of sexual abuse and sexual harassment. All allegations are investigated by the Kern County Sheriff's Office, which is a proper law enforcement agency with legal authority to conduct criminal investigations. The KCSO policy detailing the general investigative process is publicly available for review on the agency website. In reviewing all investigative documentation, as well as interviewing Lerdo Justice Facility investigative staff, it is clear that the Lerdo Justice Facility has maintained compliance with all requirements of the investigative process. As such, the Lerdo Justice Facility has met the requirements of this standard for the relevant review period.</p>
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<b>115.31</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>· KCSO Employee PREA Training PowerPoint Lesson Slides, 9-10-18</li> <li>· KCSO Employee PREA Training PowerPoint Lesson Slides, Initial, 2025</li> <li>· KCSO Employee PREA Training PowerPoint Lesson Slides, Refresher, 2025</li> <li>· KCSO Training Bulletin, Cross-gender "PAT" Searches and Searches of Transgender or Intersex Inmates, 12-3-14</li> <li>· KCSO Training Bulletin, PREA Inmate Education and Automatic Email Update, 10-20-21</li> <li>· KCSO Training Bulletin, Update to CJIS PREA Risk Screening Booking Questions, 5-2-22</li> <li>· KCSO Memo, PREA Roster/Orientation Training, 2025</li> <li>· KCSO Memo, Employee PREA Course Tracking Completion Roster, FY25</li> <li>· KCSO Justice Center Employee Course Roster with PREA Staff Training Documentation, 28 Employee Records: 7-23-24</li> <li>· KCSO Sign-In Sheet, PREA Civilian Jail Training &amp; Hostage Survival: 8-10-24,</li> </ul>

8-24-24

- KCSO Justice Center Employee Course Roster with PREA Staff Training Documentation, 22 Employee Records: 10-18-24, 10-24-24
- KCSO Justice Center Employee Course Roster with PREA Staff Training Documentation, 32 Employee Records: 11-27-24
- KCSO Justice Center Employee Course Roster with PREA Staff Training Documentation, 31 Employee Records: 2-24-25
- KCSO Justice Center Employee Course Roster, June 2025
- KCSO PREA Training, Instructor Class:3-27-24
- KCSO PREA Training, Initial:10-23-12, 2-12-13, 4-9-13, 6-21-13, 10-30-13, 11-7-13, 11-13-13, 1-15-14, 1-29-14, 4-16-16, 5-25-18, 4-19-19, 5-18-20, 8-6-20, 11-2-21, 8-25-23, 11-26-24, 4-10-25
- KCSO PREA Training, Refresher: 9-29-15, 10-6-15, 10-20-15, 10-27-15, 1-5-16, 10-12-17a, 10-12-17b, 10-16-17a, 10-16-17b, 10-18-17, 10-25-17, 11-20-19, 12-18-19, 1-8-20, 1-22-20, 2-19-20, 3-4-20, 3-15-22, 3-22-22a, 3-22-22b, 3-22-22c, 3-22-22d, 4-5-22, 4-12-22, 4-26-22, 10-10-22, 9-13-23, 9-20-23, 10-11-23, 11-8-23, 11-15-23, 12-6-23, 12-13-23, 1-1-24, 1-24-24, 4-10-25

Interviews:

- Facility Administrator
- PREA Compliance Manager
- Administrative (Human Resources) Staff
- Medical Staff
- Mental Health Staff
- Random Staff

Site Review Observations:

- Random review of employee files onsite, as well as matched review of employee files to employees interviewed, to confirm documentation of required PREA training.

Standard Subsections:

(A) Agency policy (P-300) notes that “the Kern County Sheriff’s Office (KCSO) is committed to providing a zero-tolerance environment toward all forms of sexual abuse and harassment and communicating the PREA policies to all employees, contractors, volunteers, and incarcerated people. KCSO believes that staff training and incarcerated person education are fundamental to deterring sexual abuse and sexual harassment in all its facilities.” Among many other facets, this training ensures that employees are aware of sexual abuse and sexual harassment policies. As verified by Human Resource staff, training on the agency’s zero-tolerance policy for sexual abuse and sexual harassment is initially performed as a function of the hiring process. This PREA: Ensuring Inmates’ Rights and Changing Jail Culture training is a comprehensive discussion of laws and the PREA standards. A review of the training curriculum for the KCSO’s PREA course reflects the agency’s zero-tolerance policy for sexual abuse and sexual harassment, as well as discussions on how employees may fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures. Employees are also informed that incarcerated persons have a right to be free from sexual abuse and sexual harassment, to be free from retaliation for reporting said abuse and harassment, the dynamics of sexual abuse/harassment, reactions to sexual abuse/harassment, how to detect and respond to signs of threatened and actual sexual abuse, how to avoid inappropriate relationships with incarcerated persons, how to comply with relevant mandatory reporting laws specific to reporting abuse to outside authorities, and how to communicate effectively and professionally with incarcerated persons; including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming incarcerated persons. During random staff interviews, all employees confirmed receipt of said training. Additionally, a random review of employee files confirmed receipt of said training for all employee files reviewed.

(B) A review of the current training curriculum reflects the educational materials to be appropriate for all genders of incarcerated persons who could be held within the Lerdo Justice Facility. Additionally, as noted by the PCM, if staff were transferred from a facility holding different genders of incarcerated persons, said staff would receive additional training tailored to the gender needs of those persons incarcerated within the Lerdo Justice Facility. More specifically, agency policy (P-300) notes that “male and female staff work in both male and female facilities and trainings will be tailored to both genders.” During the audit time frame, the Lerdo Justice Facility has not had any employees reassigned from facilities housing any different gender incarcerated persons.

(C) Agency policy requires all KCSO employees to complete initial PREA training during the pre-service academy or other hiring processes. Furthermore, policy (P-300) notes that the “KCSO will provide each employee with refresher training every two years to ensure that all employees know the agency’s current sexual abuse and sexual harassment policies and procedures, or when there is significant change in PREA policy.” A review of Lerdo Justice Facility PREA Training Completion Report for the audit time frame reflects that all actively employed staff have received their initial PREA training, as well as continued training as appropriate based on agency policy (P-300). As noted by Human Resource staff, Lerdo Justice Facility employees receive training specific to the agency’s zero-tolerance policy for sexual abuse and sexual harassment during their pre-service academy or other hiring process. Lerdo Justice Facility staff are then required to participate in subsequent PREA refresher training at least every two years. This training provides all staff with refreshers on the agency’s zero-tolerance policy or other changes as they relate to sexual abuse or sexual harassment policies. A review of the Lerdo Justice Facility PREA Training Completion Report reflects initial and subsequent training schedules have all been maintained.

(D) All training is verified and documented upon completion of the KCSO PREA training curriculum. A review of training documentation reflects that KCSO employees acknowledge and understand the training they have received.

Reasoning & Findings Statement:

This standard addresses the need for all KCSO employees to receive information on and fully comprehend the agency’s zero-tolerance policy regarding sexual abuse and sexual harassment of incarcerated persons. Accordingly, the training curriculum for this subject matter, as listed in subsection (a) of this standard, is exceptionally detailed. The training provided to staff of the Lerdo Justice Facility is tailored to all genders of incarcerated persons assigned to the facility. If staff are transferred to the Lerdo Justice Facility from a facility that does not house the same gender of incarcerated persons, agency policy dictates said staff would be provided gender specific training as a function of the facility’s orientation program. All training is documented. The Lerdo Justice Facility then maintains an overall master list of all staff having completed said training. During staff interviews, all employees affirmed their having received significant amounts of training as related to the PREA standards. When asked the series of questions noted within Subsection A of this standard, all staff knew and understood their responsibilities within the agency’s zero-tolerance policy. With all this in mind, the KCSO, and by extension, the Lerdo Justice Facility, has clearly met the requirements of this standard.

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23</li> <li>• Kern County and KCSO Contract with Prison Ministries of America, 10-25-22</li> <li>• KCSO Contractor, Volunteer, and KCSO Civilian Staff PREA Training PowerPoint Lesson Slides, 2025</li> <li>• KCSO Civilian/Volunteer PREA Course Tracking Completion Roster, FY25</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> <li>• Administrative (Human Resources) Staff</li> <li>• Medical Staff</li> <li>• Mental Health Staff</li> <li>• Contractors Who May Have Contact with Inmates</li> <li>• Volunteers Who May Have Contact with Inmates</li> </ul> <p>Site Review Observations:</p> <ul style="list-style-type: none"> <li>• Random review of contractor and volunteer files onsite, as well as matched review of contractor and volunteer files to those interviewed, to confirm documentation of required PREA training.</li> </ul>

Standard Subsections:

(A) Agency policy (P-300) notes that “the Kern County Sheriff’s Office (KCSO) is committed to providing a zero-tolerance environment toward all forms of sexual abuse and harassment and communicating the PREA policies to all employees, contractors, volunteers, and incarcerated people. KCSO believes that staff training and incarcerated person education are fundamental to deterring sexual abuse and sexual harassment in all its facilities.” Policy (P-300) further requires that “all KCSO volunteers and contractors who have contact with incarcerated people will be notified of KCSO’s zero-tolerance policy regarding sexual abuse and sexual harassment and will be trained how to report such incidents. KCSO will ensure that all volunteers and contractors will be trained on their responsibilities under KCSO sexual abuse and sexual harassment prevention, detection and response policies and procedures.” As noted by the Lerdo Justice Facility PCM, all contractors and volunteers are given PREA training based on their level of interaction with incarcerated persons. Specifically, policy notes that “the level and type of training provided to volunteers and contractors will be based on the services they provide and level of contact they have with incarcerated people.” During the audit time frame, the Lerdo Justice Facility has had volunteers and contract workers within the facility who could have contact with incarcerated persons. As affirmed by the Lerdo Justice Facility PCM, 100% of those persons have received appropriate PREA training, dependent on their level of contact with incarcerated persons, prior to their entrance into the facility. Volunteer and contractor files were randomly reviewed onsite for receipt of required training documentation. Additionally, when interviewed, both contractors and volunteers confirmed their initial receipt of PREA training, as well as subsequent annual trainings as appropriate.

(B) Agency policy (P-300) dictates that “all KCSO volunteers and contractors who have contact with incarcerated people will be notified of KCSO’s zero-tolerance policy regarding sexual abuse and sexual harassment and will be trained how to report such incidents. KCSO will ensure that all volunteers and contractors will be trained on their responsibilities under KCSO sexual abuse and sexual harassment prevention, detection and response policies and procedures.” A review of the training curriculum for contractors and volunteers reflects that all such persons are provided, among many other areas of discussion, with information regarding the agency’s zero-tolerance policy specific to sexual abuse and sexual harassment, as well as how to report such incidents. Interviews with contractors and volunteers reflect their awareness of this information. A review of training acknowledgments also supports that all contractors and volunteers are made aware of their responsibilities within the agency’s zero-tolerance policy.

	<p>(C) Agency policy (P-300) requires that “the KCSO Training Section will maintain documentation confirming that volunteers and contractors understand the training they have received.” As confirmed by the Lerdo Justice Facility PCM, all training is documented, with those persons receiving such training signing their acknowledgements of such. A review of training acknowledgments signed by contractors and volunteers reflects that the facility does, in fact, both document the required training and maintain documentation confirming that volunteers and contractors understood the training they have received.</p> <p>Reasoning &amp; Findings Statement:</p> <p>Agency policy requires that all contractors and volunteers receive training on the agency’s zero tolerance of sexual abuse and sexual harassment policy prior to their rendering any services to incarcerated persons. This training is provided appropriate to the level and type of services that contractors and volunteers provide, as well as the level of contact these providers will have with incarcerated persons. The facility does maintain documentation to support the training provided to all contractors and volunteers. In speaking with contractors and volunteers, all persons stated that they had received this training prior to their providing any services on the facility. Lastly, all contractors and volunteers interviewed were also able to articulate their awareness of the agency’s zero-tolerance policy, as well as their responsibilities specific to reporting concerns of sexual abuse and sexual harassment. In total, the Lerdo Justice Facility has met the requirements of this standard.</p>
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115.33	Inmate education
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff’s Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff’s Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff’s Office, P-350, PREA Intake and Screening, 7-11-24</li> <li>• Kern County Sheriff’s Office, P-600, PREA Criminal and Administrative Investigations, 7-11-24</li> </ul>



- KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23
- Kern County and KCSO Contract with Language Line Services, 5-28-24
- KCSO Language Line Solutions Language Identification Guide
- KCSO Language Line Solutions Interpretation Services Available
- KCSO Detentions Bureau Prisoner Information Brochure, English
- KCSO Detentions Bureau Prisoner Information Brochure, Spanish
- KCSO Incarcerated Person Orientation Booklet, English, 7-11-24
- KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24
- KCSO Incarcerated Person Acknowledgement of Grievance Procedure, English, 7-11-24
- KCSO Incarcerated Person Acknowledgement of Grievance Procedure, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Information Sheet, English
- KCSO Detentions Bureau PREA Information Sheet, Spanish
- KCSO Detentions Bureau PREA Information Sheet, Braille
- KCSO Detentions Bureau PREA Awareness Poster, English
- KCSO Detentions Bureau PREA Awareness Poster, Spanish
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, English, 7-8-22
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, Spanish, 7-8-22
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, English, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, English, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, Spanish, 7-11-24
- KCSO Incarcerated Person PREA Training Video, English
- KCSO Incarcerated Person PREA Training Video, Spanish
- KCSO PREA Inmate Education / Orientation Roster, English

- KCSO PREA Inmate Education / Orientation Roster, Spanish
- KCSO PREA Inmate Education, Initial Training: 8-3-22, 8-17-22, 11-26-23, 3-27-24, 4-23-24, 6-16-24, 8-19-24, 8-26-24, 10-5-24, 10-7-24, 10-8-24, 10-21-24, 10-28-24, 11-2-24a, 11-2-24b, 11-4-24, 11-6-24, 11-12-24, 11-25-24, 12-7-24, 12-11-24, 12-13-24, 12-17-24, 1-3-25, 1-9-25, 1-23-25, 2-1-25, 2-6-25, 2-7-25, 2-17-25a, 2-17-25b, 2-20-25a, 2-20-25b, 2-21-25, 2-24-25, 2-26-25, 3-3-25, 3-4-25a, 3-4-25b, 3-6-25, 3-7-25, 3-13-25, 3-19-25, 3-22-25, 3-25-25, 3-28-25, 3-29-25, 4-2-25, 4-4-25, 4-5-25, 4-7-25, 4-9-25, 4-10-25, 4-11-25, 4-12-25, 4-13-25, 4-14-25, 4-16-25, 4-21-25, 4-29-25, 5-5-25, 5-7-25, 5-9-25, 5-14-25a, 5-14-25b, 5-15-25a, 5-15-25b, 5-15-25c, 5-16-25, 5-19-25a, 5-19-25b, 5-21-25, 5-22-25, 5-23-25, 5-24-25, 5-25-25, 5-26-25a, 5-26-25b, 5-28-25, 5-29-25a, 5-29-25b, 6-2-25a, 6-2-25b, 6-5-25, 6-7-25a, 6-7-25b, 6-10-25, 6-11-25a, 6-11-25b, 6-12-25, 6-13-25, 6-14-25, 6-15-25, 6-16-25a, 6-16-25b, 6-16-25c, 6-22-25a, 6-22-25b, 6-22-25c, 6-23-25a, 6-23-25b, 6-23-25c, 6-23-25d, 6-23-25e, 6-23-25f

#### Interviews:

- Agency PREA Coordinator
- PREA Compliance Manager
- Intake Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Random Inmates

#### Site Review Observations:

- Observed the incarcerated person reception area.
- Observed PREA Risk Screening process.
- Observed PREA informational postings in incarcerated person Housing, Education, Library, and other areas of high traffic.
- Observed a variety of PREA related materials and information available for incarcerated person use within the intake area and on incarcerated person tablets.
- Observed incarcerated person PREA training video.
- Reviewed incarcerated person files for documentation of PREA training.

Standard Subsections:

(A) Agency policy (P-350) requires that upon admission into the KCSO, booking staff must “provide all incarcerated people with a PREA new incarcerated person information sheet.” As a function of the primary intake process, all persons are verbally advised that they “have the right to be free from sexual abuse while in the Sheriff’s custody. The Sheriff has zero tolerance for sexual abuse against incarcerated people and all reports will be investigated. To report an incident you can dial #7777, or talk to a Deputy, or medical person.” Incarcerated persons are then asked to confirm their understanding of the information provided to them. Each incarcerated person is also issued a facility orientation handbook. A review of the Lerdo Justice Facility intake process demonstrated how this initial information is provided to all incarcerated persons upon their entry into the facility. Interviews with intake staff further explained the process. The Lerdo Justice Facility PCM further notes that of the 2,839 incarcerated persons assigned to the facility during the audit time frame, 100% received their initial and subsequent PREA training. In speaking with thirty-two (32) incarcerated persons, all but one (1) such person stated that they had been given this information upon arrival at the facility. However, a review of incarcerated person training documentation reflects all thirty-two (32) incarcerated persons interviewed received both their initial and subsequent PREA training regarding the agency’s zero-tolerance policy specific to sexual abuse and sexual harassment, to include reporting information.

(B) KCSO policy (P-300) requires that “all incarcerated people will receive education in the form of English and Spanish spoken video orientation information as well as written information about sexual abuse and harassment. This education is provided upon intake and within the first 30 days of their detainment in KCSO custody.” All incarcerated persons are provided a comprehensive education on the KCSO policies against sexual abuse and sexual harassment via video instruction. This PREA education video advises incarcerated persons of their rights to be free from sexual abuse, sexual harassment, and retaliation for reporting such incidents. The PREA education video also includes the KCSO policies and procedures for responding to such incidents. This video is available in both English and Spanish. A review of the incarcerated person PREA education video finds that said video does provide a comprehensive explanation of the agency’s zero-tolerance policy specific to sexual abuse and sexual harassment. Within the audit time frame, the Lerdo Justice Facility has received 2,839 incarcerated persons. Per the Lerdo Justice Facility PCM, of those persons whose length of stay was more than thirty days, 100% were provided a more comprehensive explanation of the PREA process. In speaking with random incarcerated persons, all such persons knew of at least one way to report allegations of sexual abuse and sexual harassment, as well as the agency’s responsibility to protect them from such. As well, a review of incarcerated person training

documentation reflects all thirty-two (32) incarcerated persons interviewed received both their initial and subsequent PREA training regarding the agency's zero-tolerance policy specific to sexual abuse and sexual harassment, to include reporting information.

(C) KCSO policy (P-300) requires that "all incarcerated people will receive education in the form of English and Spanish spoken video orientation information as well as written information about sexual abuse and harassment. This education is provided upon intake and within the first 30 days of their detainment in KCSO custody." All incarcerated persons are provided a comprehensive education on the KCSO policies against sexual abuse and sexual harassment via video instruction. This PREA education video advises incarcerated persons of their rights to be free from sexual abuse, sexual harassment, and retaliation for reporting such incidents. The PREA education video also includes the KCSO policies and procedures for responding to such incidents. This video is available in both English and Spanish. As noted by Lerdo Justice Facility Intake staff, every newly assign incarcerated person to the Lerdo Justice Facility, as well as any incarcerated person transferring between KCSO detention facilities regardless of how long the incarcerated person has been within KCSO custody, will review this comprehensive video component on sexual abuse and sexual harassment prevention, as well as facility reporting and response procedures. A review of the incarcerated person PREA education video finds that said video does provide a comprehensive explanation of the agency's zero-tolerance policy specific to sexual abuse and sexual harassment. In speaking with random incarcerated persons, all such persons knew of at least one way to report allegations of sexual abuse and sexual harassment, as well as the agency's responsibility to protect them from such. As well, a review of incarcerated person training documentation reflects all thirty-two (32) incarcerated persons interviewed received both their initial and subsequent PREA training regarding the agency's zero-tolerance policy specific to sexual abuse and sexual harassment, to include reporting information.

(D) Agency policy (P-300) dictates that "KCSO will provide incarcerated person education in formats accessible to all incarcerated people, including those who are limited English proficient, deaf, visually impaired or otherwise disabled, as well as to incarcerated people who have limited reading skills." Agency policy (P-300) also requires that "medical or mental health staff will help an incarcerated person with a disability understand intake or comprehensive information if the incarcerated person's disability or impairment prevents them from understanding such material." As noted by the agency PREA Coordinator, accommodations are provided to incarcerated persons as necessary to help with their understanding and subsequent ability to utilize the PREA reporting processes. In speaking with Intake staff, accommodation strategies were discussed for incarcerated persons with limited English proficiency, deaf, visually impaired, those with limited reading skills, as well as those incarcerated persons who are otherwise disabled. All PREA information is provided in several alternative formats to ensure incarcerated persons with

disabilities, to include those with limited English proficiency, have equal opportunity to receive, understand, and utilize the PREA process as necessary to promote the sexual safety of all incarcerated persons assigned to the KCSO, and more specifically, the Lerdo Justice Facility. PREA brochures and informational posters are provided in both English and Spanish, the two most common languages spoken within the Lerdo Justice Facility. The PREA educational video is available in two languages: English and Spanish. PREA informational sheets are available in braille for the visually impaired. Translation services are available for incarcerated persons who don't speak English, Spanish, or any other language spoken by KCSO staff. As well, per policy (P-300), the agency will provide reasonable accommodations to all incarcerated persons in need of ADA accommodations, both physical and cognitive, to ensure said incarcerated persons have equal opportunity to benefit from the agency's zero-tolerance stance against sexual abuse and sexual harassment. Interviews with Intake, as well as mental health and advocacy contracted staff, confirm Lerdo Justice Facility compliance with policy. Lastly, in speaking with thirty-two (32) incarcerated persons, all but one (1) such person stated that they had been given this information upon arrival at the facility.

(E) Agency policy (P-300) requires that "KCSO will maintain documentation of incarcerated person participation in PREA education sessions and require incarcerated people to sign a form stating that they have attended and understood these sessions." As noted by the Lerdo Justice Facility PCM, this documentation is then maintained within each incarcerated person's agency file. A review of random incarcerated person files reflects the presence of said documentation.

(F) Agency policy (P-300) requires that information specific to the agency's zero-tolerance against sexual abuse and sexual harassment policy "is continuously and readily available and visible to incarcerated people through posters, Incarcerated Person Orientation Booklets, or other written, audible or video formats." As noted by Intake staff, all incarcerated persons are provided personal copies of the KCSO Incarcerated Person Orientation Booklet (available in English and Spanish) upon receipt into the Lerdo Justice Facility. The PREA educational video is continuously available via incarcerated person tablets. As well, the PREA video is played at 7:00 AM each morning on the incarcerated person television. During the onsite portion of the audit, informational advisements identifying hotline numbers and local rape crisis center contact information were predominantly displayed in all housing units in both English and Spanish. Additionally, PREA awareness posters, in both English and Spanish, were displayed throughout the facility in areas such as the receiving and discharge department, medical, and behavioral health departments. Posters for third party reporting, such as reporting done by family, friends, and other incarcerated person advocates, were also posted in both English and Spanish, throughout the facility and within the facility front lobby.

	<p>Reasoning &amp; Findings Statement:</p> <p>This standard requires that all persons incarcerated within the Lerdo Justice Facility are provided education specific to the agency's zero-tolerance policy against sexual abuse and sexual harassment. This information must be provided in a manner that each incarcerated person can understand, to include accommodations for limited English proficiency, as well as other physical or cognitive disabilities. In that, the Lerdo Justice Facility has demonstrated its compliance with agency policy by ensuring all incarcerated individuals received into the facility are provided an initial overview of this information immediately upon facility intake. The Lerdo Justice Facility also provides all incarcerated persons a more a comprehensive orientation of the agency's PREA program within thirty (30) days of facility intake. This ensures that all incarcerated persons within the Lerdo Justice Facility are cognizant of the agency's zero-tolerance policy toward sexual abuse and sexual harassment, as well as have subsequent access to, and can effectively utilize, PREA reporting mechanisms. In speaking with incarcerated persons assigned to the Lerdo Justice Facility, all incarcerated persons stated that they were aware of PREA and its purpose within the facility. While incarcerated persons were collectively aware of the policy and their rights to varying degrees, all incarcerated persons interviewed were specifically aware of at least one, but generally more, methods by which they could report allegations of sexual abuse or sexual harassment. Accordingly, the Lerdo Justice Facility has met the requirements of this standard.</p>
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115.34 Specialized training: Investigations	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• KCSO Training Division Training Order, Course Title: Seniors Specialized Investigators, 2023</li> <li>• KCSO Detentions Seniors: Sex Crimes Investigators Training Course PowerPoint Slides, 9-10-18</li> <li>• KCSO PREA Training Completion Section Roster, 7-5-25</li> </ul>

- KCSO, South Bay Regional Public Safety Training Academy, Law Enforcement Institute of Criminal Investigations (ICI) Sexual Assault Training Course Informational Flyer
- KCSO Training Request, ICI Sexual Assault Training Course: September 9-12, 2025
- KCSO Training Request, ICI Sexual Assault Training Course: November 3-7, 2025
- KCSO Training Bulletin, PREA LERMS/MOBILE and JMS Reporting Update, 9-12-14
- KCSO Training Bulletin, In-Custody Sexual Assault/Abuse/Harassment Investigations, 8-10-18
- KCSO PREA Training, Seniors Specialized Investigators Training: 6-6-18, 10-10-22, 12-11-23

Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Administrative (Human Resources) Staff
- KCSO Investigative Staff

Site Review Observations:

- Observed investigative training certifications.
- Reviewed agency training records documenting investigative training curriculums.

Standard Subsections:

(A) Per agency policy (P-300), requires that “in addition to the general training

provided to all employees, KCSO will ensure that staff who conduct sexual assault and abuse investigations receive training in conducting such investigations in confinement settings.” In interviewing KCSO investigative staff, said staff confirmed participation in such courses. Additionally, training curriculums and employee training certifications provided additional documentation to support facility compliance.

(B) Per policy (P-300), all employees receive training related to the prevention, detection, response, and investigation of sexual misconduct. Additionally, policy (P-300) requires that prior to conducting PREA investigations, all investigators will receive specialized training for PREA investigators that includes “techniques for: interviewing sexual abuse victims; proper use of Miranda and Garrity warnings; sexual abuse evidence collection in confinement settings; and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.” In interviewing KCSO investigative staff, said staff confirmed participation in related courses. Additionally, training curriculums and employee training certifications provided additional documentation to support facility compliance.

(C) Agency policy (P-300) mandates that the “KCSO will maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Documentation shall be maintained in the employee’s training file.” In speaking with the KCSO investigator, it was noted that appropriate training had been completed and was subsequently documented via agency records. A review of training records confirm required documentation is maintained within agency files for all investigators currently utilized within the Lerdo Justice Facility.

(D) The auditor is not required to audit this provision.

#### Reasoning & Findings Statement:

The standard requires that all persons employed by the KCSO who investigate allegations of sexual abuse and sexual harassment have received appropriate training of investigating such within a confinement setting. Agency documentation confirms the receipt of such training for all KCSO PREA investigators. Additionally, all investigators within the KCSO have received specialized training for interviewing sexual abuse victims, for the proper use of Miranda and Garrity warnings, for sexual abuse evidence collection in confinement settings, and for the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Interviews with agency staff confirm receipt of this training. As such, the KCSO, and by extension, the Lerdo Justice Facility, have met the requirements of this standard.



115.35	Specialized training: Medical and mental health care
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County and KCSO Contract with Kern County Forensic Services, LLC, 6-13-23</li> <li>• KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23</li> <li>• KCSO Medical and Mental Health Care Providers PREA Training Roster, 6-17-25</li> <li>• KCSO Contractor, Volunteer, and KCSO Civilian Staff PREA Training PowerPoint Lesson Slides</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Agency PREA Coordinator</li> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> <li>• Administrative (Human Resources) Staff</li> <li>• Medical Staff</li> <li>• Mental Health Staff</li> <li>• SAFE and/or SANE Personnel of the Local Hospital/Rape Crisis Clinic</li> </ul> <p>Site Review Observations:</p> <ul style="list-style-type: none"> <li>• Review of facility training records</li> </ul>

Standard Subsections:

(A) Agency policy (P-300) requires that the “KCSO will ensure that all medical and mental health care practitioners who work regularly in its facility have been trained in:

- 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.”

In speaking with Lerdo Justice Facility medical and mental health staff, all such staff confirmed their having received such training. Additionally, a review of the training curriculum for medical and mental health staff clearly indicates this material is provided during specialized training for medical and mental health staff. In speaking with Lerdo Justice Facility PCM, it was noted that 100% of the Lerdo Justice Facility medical and mental health care practitioners have received both the general PREA training required of all staff, as well as the specialized training required of medical and mental health staff. A review of agency training records document staff participation in said training requirements.

(B) As noted within policy (P-300), “KCSO contracted medical staff do not perform forensic examinations, therefore they shall consult with sexual assault investigators and hospital Sexual Assault Nurse Examiners (SANE’s) regarding the need for forensic examinations.” In speaking with medical staff, adherence to this policy was confirmed. Additionally, in speaking with staff from the local hospital; namely, Kern County Forensic Services SART Center, the continuous availability of SANE/SAFE nurses, or other qualified staff, was confirmed.

(C) Agency policy (P-300) requires that all full and part-time medical and behavioral health staff and contractors shall receive specialized training in sexual abuse and sexual harassment” As noted by medical staff, all such training is documented. Evidence of documented training was reviewed to ensure compliance with this protocol.

(D) Agency policy (P-300) dictates that “all KCSO volunteers and contractors who

	<p>have contact with incarcerated people will be notified of KCSO's zero-tolerance policy regarding sexual abuse and sexual harassment and will be trained how to report such incidents. KCSO will ensure that all volunteers and contractors will be trained on their responsibilities under KCSO sexual abuse and sexual harassment prevention, detection and response policies and procedures." As confirmed via interviews with medical and mental health contracted staff, said positions are required to complete both the generalized PREA training provided to all facility staff, as well as the specialized training required only of medical and mental health staff.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard requires that all medical and mental health care practitioners are provided both the generalized training on the agency's zero-tolerance against sexual abuse and sexual harassment, as well as specialized training on 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, as well as how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. Lerdo Justice Facility medical and mental health staff confirm that said staff have received all required education classes specific to their professional role in assisting victims of sexual abuse and sexual harassment. Also, staff of Kern County Forensic Services SART Center the local hospital where all forensic examinations are conducted, confirm that all persons conducting SANE/SAFE exams are properly certified to perform such. Documentation of agency training verifies that medical and mental health staff receive not only the generalized PREA training provided to all staff, but also specialized training specific to their medical and mental health roles within the agency. As such, the Lerdo Justice Facility has met the requirements of this standard.</p>
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115.41	Screening for risk of victimization and abusiveness
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse,</li> </ul>

7-11-24

- Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24
- Kern County Sheriff's Office, K-300, Classification Criteria, 7-11-24
- Kern County Sheriff's Office, K-500, Classification Reviews, 7-11-24
- Kern County Sheriff's Office, Gender Search Preference
- KCSO Incarcerated Person Orientation Booklet, English, 7-11-24
- KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24
- KCSO Incarcerated Person Acknowledgement of Grievance Procedure, English, 7-11-24
- KCSO Incarcerated Person Acknowledgement of Grievance Procedure, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, English, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, English, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, Spanish, 7-11-24
- KCSO Memo, PREA Risk Screening Questions
- KCSO Risk Screening Memo, Transgender Notification: 2-8-25, 3-17-25, 4-6-25a, 4-6-25b, 4-10-25, 4-23-25, 4-25-25, 4-27-25, 5-6-25, 5-29-25, 5-30-25
- KCSO PREA Holding Cell Risk Questions: 8-3-22, 8-17-22, 11-26-23, 3-27-24, 4-23-24, 6-16-24, 8-19-24, 8-26-24, 10-5-24, 10-7-24, 10-8-24, 10-21-24, 10-28-24, 11-2-24a, 11-2-24b, 11-4-24, 11-6-24, 11-12-24, 11-25-24, 12-7-24, 12-11-24, 12-13-24, 12-17-24, 1-3-25, 1-9-25, 1-23-25, 2-1-25, 2-6-25, 2-7-25, 2-17-25a, 2-17-25b, 2-20-25a, 2-20-25b, 2-21-25, 2-24-25, 2-26-25, 3-3-25, 3-4-25a, 3-4-25b, 3-6-25, 3-7-25, 3-13-25, 3-19-25, 3-22-25, 3-25-25, 3-28-25, 3-29-25, 4-2-25, 4-4-25, 4-5-25, 4-7-25, 4-9-25, 4-10-25, 4-11-25, 4-12-25, 4-13-25, 4-14-25, 4-16-25, 4-21-25, 4-29-25, 5-5-25, 5-7-25, 5-9-25, 5-14-25a, 5-14-25b, 5-15-25a, 5-15-25b, 5-15-25c, 5-16-25, 5-19-25a, 5-19-25b, 5-21-25, 5-22-25, 5-23-25, 5-24-25, 5-25-25, 5-26-25a, 5-26-25b, 5-28-25, 5-29-25a, 5-29-25b, 6-2-25a, 6-2-25b, 6-5-25, 6-7-25a, 6-7-25b, 6-10-25, 6-11-25a, 6-11-25b, 6-12-25, 6-13-25, 6-14-25, 6-15-25, 6-16-25a, 6-16-25b, 6-16-25c, 6-22-25a, 6-22-25b, 6-22-25c, 6-23-25a, 6-23-25b, 6-23-25c, 6-23-25d, 6-23-25e, 6-23-25f
- KCSO PREA Risk Screening Questions: 6-11-25, 6-23-25, 8-6-25a, 8-6-25b, 8-6-25c, 8-6-25d, 8-6-25e, 8-6-25f, 8-6-25g, 8-6-25h, 8-6-25i, 8-6-25j

Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Intake Staff
- Medical Staff
- Mental Health Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Inmates Who Identify as Lesbian, Gay, Bisexual, Transgender, or Intersex
- Inmates Who Reported Sexual Abuse
- Limited English Proficient Inmates
- Disabled Inmates
- Random Inmates

Site Review Observations:

- Observed PREA screening demonstration.
- Observed housing formats and locations.
- Reviewed incarcerated person files for documentation of risk screening.

Standard Subsections:

(A) Agency policy (P-350) advises staff that “the Kern County Sheriff’s Office (KCSO) shall conduct a thorough PREA intake and screening process of each incarcerated person received at its jail facilities to determine any medical or mental health needs, and to inform classification staff of pertinent information for use in making appropriate housing assignments.” Interviews with Lerdo Justice Facility Intake, medical, and mental health staff confirm assessments are done as a function of the

initial Intake process, as well as whenever an incarcerated person is transferred between KCSO facilities. During the onsite assessment of the facility, Intake staff demonstrated the Intake process step-by-step while providing detailed information on the initial education, assessment, housing, and programmatic needs process all incarcerated persons received on their first day of assignment at the Lerdo Justice Facility. In speaking with thirty-two (32) incarcerated persons, all but two (2) such persons confirmed risk assessments were performed upon their initial Intake. However, a review of facility documentation evidences that the assessment process was performed on all thirty-two (32) interviewed incarcerated persons upon Intake.

(B) Agency policy (P-350) advises staff that “the Kern County Sheriff’s Office (KCSO) shall conduct a thorough PREA intake and screening process of each incarcerated person received at its jail facilities to determine any medical or mental health needs, and to inform classification staff of pertinent information for use in making appropriate housing assignments.” As noted by Lerdo Justice Facility Intake, medical, and mental health staff initial assessments occur immediately upon reception. During the audit time frame, the Lerdo Justice Facility received 2,839 incarcerated persons into the facility. As noted by the Lerdo Justice Facility PCM, 100% of said persons did receive an initial risk screening immediately upon their Intake, which was well within 72 hours of receipt. A random review of risk screening documentation reflects that all initial screenings were completed within the 72-hour time frame.

(C) Agency policy (P-350) mandates that incarcerated persons will be reviewed using, among other possible screening mechanisms, the JMS medical and hazard booking screens, PREA holding cell risk questions, and the PREA Facility Transfer Risk Assessment. These PREA screening assessments are conducted using objective screening instruments. A review of the risk screening surveys provided to incarcerated persons do not present with either an implicit bias or leading statements. The risk assessment surveys do not contain value statements, bias language, or implied negative consequences for affirmative answers to any of the questions asked.

(D) Agency policy (P-350) requires that the risk screening process consider, at a minimum, if the incarcerated person has a mental, physical, or developmental disability. The Lerdo Justice Facility PCM further confirms that the risk screening assessment considers the age of the incarcerated person, the incarcerated person’s physical build, whether the incarcerated person has previously been incarcerated, whether the incarcerated person’s criminal history is exclusively nonviolent, whether the incarcerated person has prior convictions for sex offenses against an adult or child, whether the incarcerated person has previously experienced sexual victimization, the incarcerated person’s own perception of vulnerability, and whether the incarcerated person is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming. Incarcerated persons are explicitly asked if they

are gay, lesbian, bisexual, transgender, intersex, or gender nonconforming/gender nonbinary. Incarcerated persons are then asked if others perceive them as the same. Risk screeners are allowed to enter their subjective perception of the incarcerated person's gender expression, as well as any additional information regarding the incarcerated person's sexual safety. It should be noted that the KCSO does not detain incarcerated persons solely for immigration purposes. During incarcerated person interviews, most incarcerated persons stated that they had, in fact, been asked the aforementioned questions upon their receipt into the Lerdo Justice Facility.

(E) Agency policy (P-350) requires that the initial PREA risk screening process also considers an incarcerated person's probability of being sexually abusive toward other persons. The Lerdo Justice Facility PCM further confirms that along with assessing incarcerated persons for their risk of being sexually abusive, the PREA risk screening process does consider prior acts of sexual abuse, prior convictions for violent offenses, and the history of prior institutional violence or sexual abuse. Along with observing the screening process, the auditor also reviewed PREA risk screening completed within the auditing time frame. Forms were filled out in their entirety, with incarcerated persons having generally provided relevant answers to each of the questions asked.

(F) Agency policy (K-500) requires that staff "reassess each incarcerated person's risk of sexual victimization or abusiveness within 30 days from the incarcerated person's booking, based upon any additional relevant information received since the intake screening." As noted by the Lerdo Justice Facility PCM, within the audit time frame, 100% of the incarcerated persons with a length of stay in the facility for 30 days or more were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival to the Lerdo Justice Facility. In speaking with Lerdo Justice Facility Risk Screener Staff, their adherence to this policy was confirmed. Additionally, a review of documentation specific to said assessments confirmed both initial and subsequent assessments were provided within the required time frames. Nonetheless, during interviews with incarcerated persons, five (5) of the incarcerated persons did not remember or denied having received subsequent risk assessments. A random review of risk screening documentation reflects that all subsequent risk screenings were completed within the 30-day time frame.

(G) Agency policy (K-500) requires that "Reassess an incarcerated person's risk for sexual victimization or abusiveness when warranted due to referral, request, incident of sexual abuse, or receipt of additional information that bears on the incarcerated person's risk of sexual victimization or abusiveness." In speaking with the Lerdo Justice Facility PCM, risk assessments done after investigations and referral processes were explained in detail. A review of documentation demonstrating subsequent risk assessments and referrals supports the facility's application of the subsequent risk assessment and referral process.

(H) Agency policy (K-300) advises that “incarcerated people will not be disciplined for refusing to answer or for not disclosing complete information in response to questions asked pursuant to the PREA screening at intake.” In speaking with the Lerdo Justice Facility PCM, adherence to this policy was affirmed. Intake, medical and mental health staff, as well as risk screener staff, also confirmed that incarcerated persons may refuse to answer any questions on the survey or may refuse participation in the entire survey without the threat of negative consequences. In speaking with random incarcerated persons, as well as those who were, or may have been perceived as, disabled, lesbian, gay, bisexual, transgender, intersex, or limited English proficient, none (0) expressed having experienced any discipline or retaliation for refusing to answer or disclose information during the risk screening process.

(I) Agency policy (K-100) requires that “classification staff shall implement appropriate controls within their unit to ensure that sensitive information and responses pursuant to the PREA screening process is not exploited to the incarcerated person’s detriment by staff or other incarcerated people.” In speaking with random staff, all such staff expressed an understanding that information obtained as a function of sexual abuse or sexual harassment allegations, investigations, or other related processes was considered confidential and discussed only on a need-to-know basis. As well, in speaking with risk screeners, the confidentiality of the assessment process was clearly understood. Lastly, the auditor observed that completed PREA assessments were maintained in a confidential manner.

#### Reasoning & Findings Statement:

This standard requires that all incarcerated persons are properly screened for their risk of being sexually victimized or sexually abusive. This screening is done to ensure all incarcerated persons are provided meaningful protection against such abuse while incarcerated. As a foundation of this protection, the KCSO has developed an objective risk screening instrument that is administered and scored at the facility level as a simple fact assessment each time an incarcerated person is received upon the facility, at the initiation and conclusion of investigations into substantiated or unsubstantiated allegations, or when referrals are made due to mental health concerns and/or referrals due to concerns of substantial imminent risk of sexual abuse. The Lerdo Justice Facility has demonstrated the use of the PREA assessment process as required by policy. All initial assessments are ordinarily completed within 72 hours of intake, with subsequent assessments generally performed no later than 30 days after intake. All interviewed staff were knowledgeable of the confidentiality of the risk assessment, as well as an incarcerated person’s right to refuse participation in the assessment process. A review of documentation supporting the risk assessment process reflects the facility’s overall adherence to agency policy. As such, the Lerdo Justice Facility has met all requirements of this standard.



115.42	Use of screening information
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>· Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>· Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>· Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24</li> <li>· Kern County Sheriff's Office, K-300, Classification Criteria, 7-11-24</li> <li>· Kern County Sheriff's Office, K-500, Classification Reviews, 7-11-24</li> <li>· Kern County Sheriff's Office, Gender Search Preference</li> <li>· KCSO Incarcerated Person Orientation Booklet, English, 7-11-24</li> <li>· KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24</li> <li>· KCSO Incarcerated Person Acknowledgement of Grievance Procedure, English, 7-11-24</li> <li>· KCSO Incarcerated Person Acknowledgement of Grievance Procedure, Spanish, 7-11-24</li> <li>· KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, English, 7-11-24</li> <li>· KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, Spanish, 7-11-24</li> <li>· KCSO Detentions Bureau PREA Holding Cell Risk Questions, English, 7-11-24</li> <li>· KCSO Detentions Bureau PREA Holding Cell Risk Questions, Spanish, 7-11-24</li> <li>· KCSO Memo, PREA Risk Screening Questions</li> <li>· KCSO Detentions Bureau Targeted Incarcerated Persons Interview Rosters, 6-22-25</li> <li>· KCSO Risk Screening Memo, Transgender Notification: 2-8-25, 3-17-25, 4-6-25a, 4-6-25b, 4-10-25, 4-23-25, 4-25-25, 4-27-25, 5-6-25, 5-29-25, 5-30-25</li> <li>· KCSO PREA Holding Cell Risk Questions: 8-3-22, 8-17-22, 11-26-23, 3-27-24,</li> </ul>

4-23-24, 6-16-24, 8-19-24, 8-26-24, 10-5-24, 10-7-24, 10-8-24, 10-21-24, 10-28-24, 11-2-24a, 11-2-24b, 11-4-24, 11-6-24, 11-12-24, 11-25-24, 12-7-24, 12-11-24, 12-13-24, 12-17-24, 1-3-25, 1-9-25, 1-23-25, 2-1-25, 2-6-25, 2-7-25, 2-17-25a, 2-17-25b, 2-20-25a, 2-20-25b, 2-21-25, 2-24-25, 2-26-25, 3-3-25, 3-4-25a, 3-4-25b, 3-6-25, 3-7-25, 3-13-25, 3-19-25, 3-22-25, 3-25-25, 3-28-25, 3-29-25, 4-2-25, 4-4-25, 4-5-25, 4-7-25, 4-9-25, 4-10-25, 4-11-25, 4-12-25, 4-13-25, 4-14-25, 4-16-25, 4-21-25, 4-29-25, 5-5-25, 5-7-25, 5-9-25, 5-14-25a, 5-14-25b, 5-15-25a, 5-15-25b, 5-15-25c, 5-16-25, 5-19-25a, 5-19-25b, 5-21-25, 5-22-25, 5-23-25, 5-24-25, 5-25-25, 5-26-25a, 5-26-25b, 5-28-25, 5-29-25a, 5-29-25b, 6-2-25a, 6-2-25b, 6-5-25, 6-7-25a, 6-7-25b, 6-10-25, 6-11-25a, 6-11-25b, 6-12-25, 6-13-25, 6-14-25, 6-15-25, 6-16-25a, 6-16-25b, 6-16-25c, 6-22-25a, 6-22-25b, 6-22-25c, 6-23-25a, 6-23-25b, 6-23-25c, 6-23-25d, 6-23-25e, 6-23-25f

· KCSO PREA Risk Screening Questions: 6-11-25, 6-23-25, 8-6-25a, 8-6-25b, 8-6-25c, 8-6-25d, 8-6-25e, 8-6-25f, 8-6-25g, 8-6-25h, 8-6-25i, 8-6-25j

#### Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Intermediate or Higher-Level Facility Staff
- Intake Staff
- Medical Staff
- Mental Health Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Random Staff
- Inmates Who Identify as Lesbian, Gay, Bisexual, Transgender, or Intersex
- Disabled Inmates
- Limited English Proficient Inmates

#### Site Review Observations:

- Observed PREA screening process.

- Reviewed incarcerated person files.
- Observed incarcerated person housing, work assignments, and other programmatic assignments.

Standard Subsections:

(A) Agency policy (K-100) provides that “classification staff shall use information obtained during the PREA screening process to make individualized determinations about how to ensure the safety of each incarcerated person, and to make or recommend housing, bed, work, education, and program assignments with the goal of keeping separate those incarcerated people at high risk of being sexually victimized from those at high risk of being sexually abusive” As noted by Risk Screening staff, the use of the PREA risk screening criteria provides staff with objective measures to make informed decisions on institutional assignments to help keep separate those incarcerated persons at high risk of being sexually victimized from those at high risk of being sexually abusive. Documentation review of a Lerdo Justice Facility PREA risk screening forms reflect the institutionalized and intelligent use of the information gained from the PREA risk screening process.

(B) Agency policy (K-100) requires classification staff to make individualized determinations about how to ensure the safety of each incarcerated person. Specifically, policy (K-100) notes that “the objective of the incarcerated person classification plan is to assess the risk criteria and custody requirements systematically and continually for all incarcerated people confined in the Sheriff’s Detention facilities.” In speaking with the agency PREA Coordinator, the Lerdo Justice Facility Administrator, the Lerdo Justice Facility PCM, and Lerdo Justice Facility Risk Screeners, all staff confirmed that the needs of each incarcerated person are reviewed on an individual basis. In speaking with incarcerated persons assigned to the Lerdo Justice Facility, all thirty-two (32) incarcerated persons interviewed stated that Lerdo Justice Facility administrative staff did take concerns for the sexual safety of incarcerated persons seriously. As well, all incarcerated persons assigned to the Lerdo Justice Facility stated that they had no fear for their own sexual safety or any concerns of being sexually assaulted while assigned to the Lerdo Justice Facility.

(C) Agency policy (P-410) dictates that “transgender and intersex incarcerated people are first screened and evaluated for potential vulnerability by intake and classification staff for initial housing placement and referred to the Gender Identity Committee (GIC) within 10 days of the incarcerated person’s entry into the system...The GIC will Interview the incarcerated person and review the incarcerated person’s records and assessments within seven days of receiving the referral from

classification and deliver a final housing recommendation to classification. The GIC will determine the best housing available based on the totality of the information.” In speaking with the agency PREA Coordinator, the Lerdo Justice Facility Administrator, the Lerdo Justice Facility PCM, and Lerdo Justice Facility Risk Screeners, staff confirm that the genital status of an incarcerated person is not the only determining factor in assigning an incarcerated person to a facility or housing section designated for male or female incarcerated persons or in making other housing or program assignments. Rather, the genital status of an incarcerated person is only one of many factors considered for the overall health and security of all incarcerated persons assigned to any facility.

(D) Agency policy (P-410) notes that the Gender Identity Committee will “reassess housing and programming assignments for each transgender or intersex incarcerated person at least twice each year to review any threats to safety experienced by the incarcerated person.” Per the Lerdo Justice Facility PCM, all transgender and intersex incarcerated persons are assessed at least every six months to review and concerns or threats to their safety. In speaking with transgender and intersex incarcerated individuals, all such persons interviewed stated that PREA risk assessments are conducted with them at least every six (6) months as required. Documentation specific to PREA risk assessments did reflect that said assessments were regularly conducted as required.

(E) Agency policy (P-410) dictates that the Gender Identity Committee ensure that “the transgender or intersex inmate’s own views shall be given serious consideration during the classification process and shall be documented.” In speaking with the Lerdo Justice Facility PCM, adherence to this policy was confirmed. Additionally, documentation specific to PREA risk assessments did reflect that the views of the incarcerated person were a considered factor within the team meeting.

(F) Agency policy (P-410) requires the Gender Identity Committee to ensure that “transgender and intersex incarcerated people will be given the opportunity to shower separately from other incarcerated people and the committee will decide on the protocol within the housing unit to ensure the incarcerated person’s privacy when showering.” In speaking with the Lerdo Justice Facility PCM, adherence to this policy was confirmed. In speaking with transgender and intersex incarcerated persons, it was noted that facility staff do provide the opportunity to shower separately from other incarcerated persons.

(A) Agency policy (P-410) mandates that “transgender and intersex incarcerated people will not be placed in involuntary separated housing unless an assessment of all other alternatives has been made and a determination has been made that there

	<p>is no available alternative means of separation from likely abusers.” As noted by the Lerdo Justice Facility PCM, the Lerdo Justice Facility is not under any consent decree or other mandatory housing requirements. As such, there isn’t any dedicated housing within the Lerdo Justice Facility for lesbian, gay, bisexual, transgender, or intersex (LGBTI) incarcerated persons. Accordingly, all such incarcerated persons are housed throughout the facility in accordance with security and other classification needs. In speaking with LGBTI incarcerated persons, none (0) stated that they had been housed, nor was there any housing dedicated Lerdo Justice Facility, for LGBTI incarcerated persons.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure the appropriate use of information gained via the risk assessment process for sexual victimization and sexual abusiveness. The KCSO has developed policies and protocols to ensure the intelligent use of this information to inform housing, bed, work, education, and program assignments with the goal of keeping separate those incarcerated persons at high risk of being sexually victimized from those at high risk of being sexually abusive. In response, the Lerdo Justice Facility has demonstrated consistent adherence to these agency policies. Among other factors, said policies require Lerdo Justice Facility staff to make individualized determinations regarding the sexual safety of transgender and intersex incarcerated persons. Along with the use of PREA risk assessments, incarcerated persons deemed to be at a higher risk of sexual victimization are routinely monitored by unit staff and provided numerous avenues to speak with unit administration as needed. Interviews with the agency PREA Coordinator and the Lerdo Justice Facility PCM reflect that facility staff have discretion in managing the safety of individual incarcerated persons assigned to the Lerdo Justice Facility. In managing the safety of incarcerated persons, documentation demonstrates that incarcerated persons’ own views regarding their own safety are given serious consideration specific to facility operations. Transgender incarcerated persons are allowed to shower separately from the general population. Additionally, transgender incarcerated persons are reviewed every six months specific to their placement and programming assignments. As such, agency policy meets, and Lerdo Justice Facility adheres to, the requirements of this standard.</p>
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<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Documents:

Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24

Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24

Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24

Kern County Sheriff's Office, P-400, Vulnerable PREA Incarcerated People Population, 7-11-24

Kern County Sheriff's Office, P-410, Gender Identity Committee, 7-11-24

Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24

Kern County Sheriff's Office, K-100, Classification General Policy, 7-11-24

Kern County Sheriff's Office, K-300, Classification Criteria, 7-11-24

Kern County Sheriff's Office, K-400, Administrative Separation, 7-11-24

Kern County Sheriff's Office, K-500, Classification Reviews, 7-11-24

KCSO Incarcerated Person Orientation Booklet, English, 7-11-24

KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24

KCSO Incarcerated Person Acknowledgement of Grievance Procedure, English, 7-11-24

KCSO Incarcerated Person Acknowledgement of Grievance Procedure, Spanish, 7-11-24

- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, English, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, English, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, Spanish, 7-11-24
- Kern County Sheriff's Office, Gender Search Preference
- KCSO Detentions Bureau Targeted Incarcerated Persons Interview Rosters, 6-22-25

#### Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Designated Staff Member Charged with Monitoring Retaliation
- Incident Review Team Member
- Intermediate or Higher-Level Facility Staff

- Staff Who Supervise Inmates in Segregated Housing
- Inmates Who Reported Sexual Abuse
- Random Inmate Interviews
- Targeted Inmate Interviews

Site Review Observations:

- Observed custody housing assignments.

Standard Subsections:

(A) Agency policy (P-200) dictates that “incarcerated people believed to be at risk of victimization shall not be placed in involuntary separated housing unless an assessment of all available alternatives has been made that there is no available alternative means of separation from likely abusers. Furthermore, agency policy (K-400) mandates that if involuntary separated housing is temporarily used, the facility will “conduct a complete assessment of the incarcerated person within 24 hours of placement to ensure administrative separation is necessary and that the incarcerated person is housed in the least restrictive housing available.” In speaking with the Lerdo Justice Facility PCM and the Lerdo Justice Facility Administrator, staff further note that this practice extends to all incarcerated persons at high risk for sexual victimization. Interviews with incarcerated persons did not suggest that Lerdo Justice Facility utilizes any form of restrictive housing as a primary means of involuntary separation for said persons being at a high risk of sexual victimization. In speaking with the Lerdo Justice Facility PCM and the Lerdo Justice Facility Administrator, staff confirm that there have not been any (0) incarcerated persons placed in administratively separated housing for being at a high risk of sexual victimization during the audit time frame. As such, there wasn’t any relevant documentation to review.

(B) Policy (K-400) mandates that if incarcerated persons are placed in restrictive housing for being at a high risk of sexual victimization, “to the extent possible, incarcerated persons administratively separated for this purpose shall have access to: programs; privileges; education; work opportunities. If access is limited, the following shall be documented: the opportunity limited; duration of the limitation; reasons for such limitations.” Interviews with incarcerated persons did not suggest that Lerdo Justice Facility utilizes any form of restrictive housing as a primary means of involuntary separation for said persons being at a high risk of sexual victimization. In

speaking with the Lerdo Justice Facility PCM and the Lerdo Justice Facility Administrator, staff confirm that there have not been any (0) incarcerated persons placed in administratively separated housing for being at a high risk of sexual victimization during the audit time frame. As such, there wasn't any relevant documentation to review.

(C) Agency policy (K-400) requires that if incarcerated persons are administratively separated for being at a high risk of sexual victimization, the facility must "ensure that the incarcerated person does not exceed 30 consecutive days of administrative separation without documentation of the concern for the incarcerated person's safety, including articulation of why no alternative means of separation from abusers can be arranged." Interviews with incarcerated persons did not suggest that Lerdo Justice Facility utilizes any form of restrictive housing as a primary means of involuntary separation for said persons being at a high risk of sexual victimization. In speaking with the Lerdo Justice Facility PCM and the Lerdo Justice Facility Administrator, staff confirm that there have not been any (0) incarcerated persons placed in administratively separated housing for being at a high risk of sexual victimization during the audit time frame. As such, there wasn't any relevant documentation to review.

(D) Agency policy (K-400) requires that if incarcerated persons are administratively separated for being at a high risk of sexual victimization, the facility must "ensure that the incarcerated person does not exceed 30 consecutive days of administrative separation without documentation of the concern for the incarcerated person's safety, including articulation of why no alternative means of separation from abusers can be arranged." Interviews with incarcerated persons did not suggest that Lerdo Justice Facility utilizes any form of restrictive housing as a primary means of involuntary separation for said persons being at a high risk of sexual victimization. In speaking with the Lerdo Justice Facility PCM and the Lerdo Justice Facility Administrator, staff confirm that there have not been any (0) incarcerated persons placed in administratively separated housing for being at a high risk of sexual victimization during the audit time frame. As such, there wasn't any relevant documentation to review.

(E) Agency policy (K-400) requires that if incarcerated persons are administratively separated for being at a high risk of sexual victimization, the facility must "Conduct a review every 30 days or sooner to determine the need for continued separation from general population." Interviews with incarcerated persons did not suggest that Lerdo Justice Facility utilizes any form of restrictive housing as a primary means of involuntary separation for said persons being at a high risk of sexual victimization. In speaking with the Lerdo Justice Facility PCM and the Lerdo Justice Facility Administrator, staff confirm that there have not been any (0) incarcerated persons placed in administratively separated housing for being at a high risk of sexual



	<p>victimization during the audit time frame. As such, there wasn't any relevant documentation to review.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure that incarcerated persons at risk of sexual victimization are not simply housed inside of involuntary protective custody as a de facto management solution for administrative safety concerns. Agency policy explicitly mandates that staff refrain from placing incarcerated persons at high risk for sexual victimization in administratively separated housing unless an assessment of all available alternatives has been made and there are no other available means of separation from likely abusers. Correctional staff routinely assigned to work within administratively separated housing were interviewed. While these staff confirmed that incarcerated persons assigned to administratively separated housing for high risk of sexual victimization would be afforded similar activities as incarcerated persons within general population, to the best of their knowledge, there have not been any such incarcerated persons assigned to such housing within the audit time frame. In speaking with the Lerdo Justice Facility PCM and the Lerdo Justice Facility Administrator, staff confirmed that there has not been any (0) incarcerated persons placed in involuntary separated housing for risk of sexual safety during the audit time frame. Additionally, there weren't any (0) incarcerated persons who stated that they had been placed in such housing. As such, there wasn't any (0) relevant documentation to review. In total, the Lerdo Justice Facility has satisfied all component parts of this standard.</p>
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<b>115.51</b>	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> </ul>

- Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24
- Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24
- Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24
- Employee PREA Training PowerPoint Lesson Slides
- KCSO Detentions Bureau Prisoner Information Brochure, English
- KCSO Detentions Bureau Prisoner Information Brochure, Spanish
- KCSO Incarcerated Person Orientation Booklet, English, 7-11-24
- KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Information Sheet, English
- KCSO Detentions Bureau PREA Information Sheet, Spanish
- KCSO Detentions Bureau PREA Information Sheet, Braille
- KCSO Detentions Bureau PREA Awareness Poster, English
- KCSO Detentions Bureau PREA Awareness Poster, Spanish
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, English, 7-8-22
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, Spanish, 7-8-22
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, English, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, English, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, Spanish, 7-11-24
- KCSO Incarcerated Person PREA Training Video, English
- KCSO Incarcerated Person PREA Training Video, Spanish
- KCSO PREA Inmate Education / Orientation Roster, English
- KCSO PREA Inmate Education / Orientation Roster, Spanish

Interviews:

- Agency Head
- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Random Staff
- Just Detention International
- Community-Based Victim Advocacy Staff
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Observed PREA Education process.
- Observed PREA Risk Screening process.
- Observed informational posters throughout the facility advising incarcerated persons of various reporting mechanisms for allegations of sexual abuse and sexual harassment.
- Observed numerous PREA educational and reporting references available for incarcerated person use throughout the facility, to include within the housing assignments.
- Reviewed documentation related to incarcerated person reports of sexual abuse and sexual harassment.
- Observed PREA informational video.
- Tested PREA Hotline number incarcerated persons can use to engage incarcerated person reporting of sexual abuse and sexual harassment.
- Tested Security Call Button located within each two-person housing area.

Standard Subsections:

(A) Agency policy (P-450) notes that “in accordance with the Prison Rape Elimination Act (PREA) standards, incarcerated people shall be provided multiple avenues, internally and externally, for reporting sexual assault/abuse. Anonymous and third-party verbal or written reports of sexual assault/abuse shall be accepted by staff from any person on an incarcerated person’s behalf. Reports of assault/abuse occurring outside of KCSO facilities shall be referred to the appropriate custodial facility or law enforcement agency.” As noted by the Lerdo Justice Facility PCM, incarcerated persons are given detailed instructions of their ability to make reports of sexual abuse or sexual harassment during both their initial and the comprehensive PREA education. This education includes contact information for internal and external reporting agencies. During interviews with twelve (12) random staff, all persons were aware of an incarcerated person’s right to report allegations of sexual abuse and sexual harassment and their right to be free from measures of retaliation for having reported said abuse. When interviewing incarcerated persons, all thirty-two (32) incarcerated persons were equally aware of their right to report allegations of sexual abuse and sexual harassment and to be free from measures of retaliation for having reported said abuse. During random and targeted interviews with incarcerated persons, all were able to articulate at least one manner by which a report could be made, with most incarcerated persons being able to provide multiple reporting methods. As noted during documentation review, instructions on reporting mechanisms, as well as points of contacts for each of those methods, are published in the Incarcerated Person Orientation Booklet. As well, reporting information is continuously displayed on awareness posters located throughout the facility, to include all incarcerated person housing areas, as well as continuously available via incarcerated person tablets.

(B) Agency policy (P-450) notes that “in accordance with the Prison Rape Elimination Act (PREA) standards, incarcerated people shall be provided multiple avenues, internally and externally, for reporting sexual assault/abuse. Anonymous and third-party verbal or written reports of sexual assault/abuse shall be accepted by staff from any person on an incarcerated person’s behalf. Reports of assault/abuse occurring outside of KCSO facilities shall be referred to the appropriate custodial facility or law enforcement agency.” Policy (P-450) further notes that incarcerated persons may make reports of sexual abuse and sexual harassment to an outside entity, such as the Bakersfield Police Department, by “calling the free reporting hotline (BPD monitored).” The direct dial, toll-free phone number for this outside entity is publicly posted on sexual abuse awareness posters displayed within all incarcerated person housing areas, as well as published in the Incarcerated Person Orientation Booklet provided to all incarcerated persons upon their assignment to the Lerdo Justice Facility. As noted by the Lerdo Justice Facility PCM, incarcerated persons are given detailed instructions of their ability to make reports of sexual abuse or sexual harassment during both their initial and the comprehensive PREA education. This education includes contact information for internal and external reporting agencies. During interviews with twelve (12) random staff, all persons were aware of an

incarcerated person's right to report allegations of sexual abuse and sexual harassment and their right to be free from measures of retaliation for having reported said abuse. When interviewing incarcerated persons, all thirty-two (32) incarcerated persons were equally aware of their right to report allegations of sexual abuse and sexual harassment and to be free from measures of retaliation for having reported said abuse. During random and targeted interviews with incarcerated persons, all were able to articulate at least one manner by which a report could be made, with most incarcerated persons being able to provide multiple reporting methods. As noted during documentation review, instructions on reporting mechanisms, as well as points of contacts for each of those methods, are published in the Incarcerated Person Orientation Booklet. As well, reporting information is continuously displayed on awareness posters located throughout the facility, to include all incarcerated person housing areas, as well as continuously available via incarcerated person tablets.

(C) Agency policy (P-450) notes that "in accordance with the Prison Rape Elimination Act (PREA) standards, incarcerated people shall be provided multiple avenues, internally and externally, for reporting sexual assault/abuse. Anonymous and third-party verbal or written reports of sexual assault/abuse shall be accepted by staff from any person on an incarcerated person's behalf." As noted within the Incarcerated Person Orientation Booklet, all incarcerated persons are provided information "to report a jail sexual assault or abuse, call the Sheriff's free sexual abuse hotline. Follow the prompts, dial #7732 to report an incident to Police." Alternatively, the Incarcerated Person Orientation Booklet provides other reporting suggestion, such as to "tell or write a kite to staff; ask to see mental health; tell the nurse at medication pass or submit a sick call slip; tell a teacher or Chaplain; notify your attorney or family member." During interviews with twelve (12) random staff, all persons were aware of an incarcerated person's right to report allegations of sexual abuse and sexual harassment and their right to be free from measures of retaliation for having reported said abuse. Random staff further noted that if such reports were received by them, all such staff indicated that immediate action would be taken to immediately protect the incarcerated individual, as well as document/investigate the allegations. Interviews with incarcerated persons reflected their knowledge of the PREA hotline and their ability to make reports of sexual abuse and sexual harassment using that no-fee option. As noted during documentation review, instructions on reporting mechanisms, including making reports to outside entities via the PREA Hotline, have been published in the Incarcerated Person Orientation Booklet. Also, reporting information is continuously displayed on awareness posters located throughout the facility, to include all incarcerated person housing areas, as well as continuously available via incarcerated person tablets. To test the functionality of the PREA Reporting Hotline, the auditor conducted a test of the phone number commonly referenced by incarcerated persons. This test was conducted utilizing a random phone within an incarcerated person housing area. A confirmation response was received on the same business day. Lastly, as noted by the Lerdo Justice Facility PCM, the Lerdo Justice Facility does not detain incarcerated persons solely for civil immigration purposes.

(D) Per policy (P-300, P-450), staff have an affirmative duty to report any knowledge, suspicion, or information they may have regarding sexual abuse, sexual harassment, or retaliation against incarcerated persons or staff for having reported such abuse. Nonetheless, per policy (P-450), staff are afforded a private means by which they may make an anonymous sexual abuse or sexual harassment report. Specifically, policy (P-450) notes that "The KCSO public website provides a link to file sexual assault/abuse related reports; reports to the website shall generate an immediate notification to the PREA Coordinator; PREA Coordinator shall notify appropriate section manager." During interviews with twelve (12) random staff, all were aware that they could make private or anonymous reports of sexual abuse and sexual harassment.

Reasoning & Findings Statement:

This standard ensures that incarcerated persons have multiple internal avenues to report allegations of sexual abuse and sexual harassment. Agency policy allows for these reports to be made verbally, in writing, anonymously, and by a third-party. These reports can be made to any facility staff, contractor, or volunteer in person, as well as to a host of employees within unit administration via paper kites or electronically through incarcerated person tablets. Incarcerated persons can also make reports of sexual abuse and sexual harassment to a designated outside entity, the Bakersfield Police Department, which can receive, and immediately forward incarcerated person reports of sexual abuse and sexual harassment to agency officials, such as the KCSO PREA Coordinator's Office. Reports to the Bakersfield Police Department may also be made anonymously. In speaking with the Lerdo Justice Facility PCM, it was noted that all incarcerated persons are provided detailed instructions, contact persons, phone numbers, and physical addresses for correspondence where allegations of sexual abuse, sexual harassment, and retaliation for reporting such may be reported. In interviewing random staff, all employees were aware that incarcerated persons could report allegations of sexual abuse and sexual harassment verbally, in writing, anonymously, and through a third party. When receiving verbal reports of sexual abuse and sexual harassment, all staff recognized the need to take immediate action to protect the incarcerated person in question and the need to document the verbal complaint as soon as possible. In speaking with incarcerated persons, all persons were aware of their right to be free from sexual abuse and sexual harassment, as well as their right not to suffer retaliation for having reported such abuse. All incarcerated persons understood their right to make verbal and written complaints, with most understanding their right to make anonymous and third-party complaints. In speaking with incarcerated persons, it was noted that all incarcerated persons were aware of the reporting hotline, with most incarcerated persons being aware that reports to that hotline could also be made free of charge and anonymously. Lastly, the auditor conducted a testing of the PREA Reporting Hotline number commonly referenced by incarcerated persons. A confirmation response was received the same business day. As such, it is evident that

	Lerdo Justice Facility has met the requirements of this standard.
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<b>115.52</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, I-0200, Incarcerated Person Grievances, 7-11-24</li> <li>• Kern County Sheriff's Office, C-1320, Criminal Complaint: General Policy, 7-11-24</li> <li>• KCSO Incarcerated Person Orientation Booklet, English, 7-11-24</li> <li>• KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24</li> <li>• KCSO Incarcerated Person Acknowledgement of Grievance Procedure, English, 7-11-24</li> <li>• KCSO Incarcerated Person Acknowledgement of Grievance Procedure, Spanish, 7-11-24</li> <li>• Kern County Sheriff's Office, Answer to Incarcerated Person Grievance Form, English, 7-11-24</li> <li>• Kern County Sheriff's Office, Answer to Incarcerated Person Grievance Form, Spanish, 7-11-24</li> <li>• KCSO Incarcerated Person Acknowledgement of Grievance Procedure: 8-3-22, 8-17-22, 11-26-23, 3-27-24, 4-23-24, 6-16-24, 8-19-24, 8-26-24, 10-5-24, 10-7-24, 10-8-24, 10-21-24, 10-28-24, 11-2-24a, 11-2-24b, 11-4-24, 11-6-24, 11-12-24, 11-25-24, 12-7-24, 12-11-24, 12-13-24, 12-17-24, 1-3-25, 1-9-25, 1-23-25, 2-1-25, 2-6-25, 2-7-25, 2-17-25a, 2-17-25b, 2-20-25a, 2-20-25b, 2-21-25, 2-24-25, 2-26-25, 3-3-25, 3-4-25a, 3-4-25b, 3-6-25, 3-7-25, 3-13-25, 3-19-25, 3-22-25, 3-25-25, 3-28-25, 3-29-25, 4-2-25, 4-4-25, 4-5-25, 4-7-25, 4-9-25, 4-10-25, 4-11-25, 4-12-25, 4-13-25, 4-14-25, 4-16-25, 4-21-25, 4-29-25, 5-5-25, 5-7-25, 5-9-25, 5-14-25a, 5-14-25b,</li> </ul>

5-15-25a, 5-15-25b, 5-15-25c, 5-16-25, 5-19-25a, 5-19-25b, 5-21-25, 5-22-25, 5-23-25, 5-24-25, 5-25-25, 5-26-25a, 5-26-25b, 5-28-25, 5-29-25a, 5-29-25b, 6-2-25a, 6-2-25b, 6-5-25, 6-7-25a, 6-7-25b, 6-10-25, 6-11-25a, 6-11-25b, 6-12-25, 6-13-25, 6-14-25, 6-15-25, 6-16-25a, 6-16-25b, 6-16-25c, 6-22-25a, 6-22-25b, 6-22-25c, 6-23-25a, 6-23-25b, 6-23-25c, 6-23-25d, 6-23-25e, 6-23-25f

- KCSO List of Sexual Abuse/Harassment Incarcerated Person Grievances, June 2024-June 2025

Interviews:

- Facility Administrator
- PREA Compliance Manager
- Investigative Staff
- Random Inmates

Site Review Observations:

- Reviewed complaint submission process.

Standard Subsections:

(A) The agency is exempt from this standard. Agency policy (I-0200) states that “grievances involving sexual abuse, sexual harassment or staff sexual misconduct will be referred for investigation and/or criminal complaint appropriate. The shift supervisor will notify the PREA Coordinator and the appropriate Section Manager of any such grievances received.” Per the agency PREA Coordinator, the KCSO does not utilize the incarcerated person grievance process as its administrative procedure for handling allegations of sexual abuse or sexual harassment. While incarcerated persons assigned to the Lerdo Justice Facility are not prohibited from utilizing any grievance related form to communicate sexual abuse and sexual harassment allegations in writing, it is important to note that any forms containing allegations of sexual abuse or sexual harassment are immediately referred to KCSO Institution Investigators for processing as criminal complaints. Hence, all investigations into allegations of sexual abuse or sexual harassment are done in accordance with agency policy regarding criminal complaints (C-1320). Documentation review supports Lerdo



	<p>Justice Facility's adherence to agency policy.</p> <p>(B) The agency is exempt from this standard.</p> <p>(C) The agency is exempt from this standard.</p> <p>(D) The agency is exempt from this standard.</p> <p>(E) The agency is exempt from this standard.</p> <p>(F) The agency is exempt from this standard.</p> <p>(G) The agency is exempt from this standard.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard ensures that all sexual abuse and sexual harassment grievances presented by incarcerated persons are processed within a reasonable time frame so that corrective action necessary to prevent or deter sexual abuse and sexual harassment is available in a timely manner. Additionally, this standard works to remove administrative barriers that may prevent incarcerated persons from filing grievances to notifying agency officials of sexual abuse and sexual harassment. However, KCSO policy (I-0200) does not permit incarcerated persons to submit grievances alleging sexual abuse and sexual harassment. Hence, as the KCSO does not have administrative procedures to address grievances from incarcerated persons regarding sexual abuse and sexual harassment, the KCSO is exempt from this standard.</p>
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<b>115.53</b>	<b>Inmate access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>

Documents:

- Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24
- Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24
- Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24
- Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24
- Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24
- Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24
- Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24
- KCSO Detentions Bureau Prisoner Information Brochure, English
- KCSO Detentions Bureau Prisoner Information Brochure, Spanish
- KCSO Incarcerated Person Orientation Booklet, English, 7-11-24
- KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Information Sheet, English
- KCSO Detentions Bureau PREA Information Sheet, Spanish
- KCSO Detentions Bureau PREA Information Sheet, Braille
- KCSO Detentions Bureau PREA Awareness Poster, English
- KCSO Detentions Bureau PREA Awareness Poster, Spanish
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, English, 7-8-22
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, Spanish, 7-8-22
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, English, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, English, 7-11-24

- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, Spanish, 7-11-24
- KCSO Incarcerated Person PREA Training Video, English
- KCSO Incarcerated Person PREA Training Video, Spanish
- KCSO PREA Inmate Education / Orientation Roster, English
- KCSO PREA Inmate Education / Orientation Roster, Spanish
- KCSO Contract with Women's Center High Desert, Inc., 4-22-24
- KCSO Women's Center High Desert, Inc., Service Pamphlet, English, 9-10-18
- KCSO Women's Center High Desert, Inc., Service Pamphlet, Spanish, 9-10-18
- KCSO Victim's Informational Pamphlet, Marsy's Card, English
- KCSO Victim's Informational Pamphlet, Marsy's Card, Spanish
- KCSO Sexual Assault Survivor's Bill of Rights, English, 10/18
- KCSO Sexual Assault Survivor's Bill of Rights, Spanish, 10/18
- KCSO PREA Referral to Rape Crisis Advocacy Center: 6-3-24a, 6-3-24b, 6-4-24, 6-5-24a, 6-5-24b, 6-6-24a, 6-6-24b, 6-7-24a, 6-7-24b, 6-7-24c, 6-7-24d, 6-10-24a, 6-10-24b, 6-10-24c, 6-10-24d, 6-11-24, 6-12-24a, 6-12-24b, 6-12-24c, 6-12-24d, 6-12-24e, 6-13-24, 6-14-24a, 6-14-24b, 6-14-24c, 6-14-24d, 6-14-24e, 6-17-24a, 6-17-24b, 6-17-24c, 6-17-24d, 6-18-24, 6-19-24a, 6-19-24b, 6-20-24a, 6-20-24b, 6-24-24a, 6-24-24b, 6-25-24a, 6-25-24b, 6-25-24c, 6-25-24d, 6-26-24a, 6-26-24b, 6-26-24c, 6-27-24a, 6-27-24b, 6-27-24c, 7-1-24, 7-2-24a, 7-2-24b, 7-2-24c, 7-3-24a, 7-3-24b, 7-5-24a, 7-5-24b, 7-5-24c, 7-5-24d, 7-5-24e, 7-8-24a, 7-8-24b, 7-8-24c, 7-9-24a, 7-9-24b, 7-9-24c, 7-9-24d, 7-10-24a, 7-10-24b, 7-10-24c, 7-10-24d, 7-10-24e, 7-10-24f, 7-10-24g, 7-11-24, 7-12-24a, 7-12-24b, 7-12-24c, 7-15-24a, 7-15-24b, 7-15-24c, 7-17-24a, 7-17-24b, 7-17-24c, 7-18-24, 7-22-24a, 7-22-24b, 7-25-24a, 7-25-24b, 7-25-24c, 7-25-24d, 7-25-24e, 7-25-24f, 7-25-24g, 7-29-24a, 7-29-24b, 7-29-24c, 7-29-24d, 7-29-24e, 7-29-24f, 7-29-24g, 7-30-24, 8-1-24a, 8-1-24b, 8-1-24c, 8-5-24, 8-6-24, 8-7-24, 8-8-24a, 8-8-24b, 8-12-24a, 8-12-24b, 8-12-24c, 8-12-24d, 8-12-24e, 8-12-24f, 8-13-24, 8-14-24, 8-15-24, 8-16-24a, 8-16-24b, 8-16-24c, 8-19-24a, 8-19-24b, 8-19-24c, 8-20-24, 8-21-24, 8-23-24, 8-26-24a, 8-26-24b, 8-27-24a, 8-27-24b, 8-28-24, 8-29-24a, 8-29-24b, 8-29-24c, 8-30-24, 9-4-24, 9-5-24a, 9-5-24b, 9-6-24a, 9-6-25b, 9-6-25c, 9-10-25a, 9-10-25b, 9-12-24a, 9-12-24b, 9-12-24c, 9-13-24a, 9-13-24b, 9-16-24a, 9-16-24b, 9-16-24c, 9-17-24, 9-19-24, 9-19-24, 9-20-24, 9-24-24a, 9-24-24b, 9-25-24a, 9-25-24b, 9-26-24, 9-30-24a, 9-30-24b, 10-1-24, 10-4-24, 10-8-24a, 10-8-24b, 10-8-24c, 10-10-24a, 10-10-24b, 10-10-24c, 10-10-24d, 10-10-24e, 10-10-24f, 10-14-24a, 10-14-24b, 10-14-24c, 10-14-24d, 10-14-24e, 10-14-24f, 10-14-24g, 10-14-24h, 10-15-24a, 10-15-24b, 10-15-24c, 10-15-24d, 10-18-24a, 10-18-24b, 10-22-24a, 10-22-24b, 10-22-24c, 10-23-24, 10-24-24, 10-25-24a, 10-25-24b, 10-25-24c, 10-28-24a,

10-28-24b, 10-28-24c, 10-28-24d, 10-29-24a, 10-29-24b, 10-29-24c, 10-29-24d, 10-29-24e, 10-30-24a, 10-30-24b, 10-31-24, 11-1-24a, 11-1-24b, 11-4-24a, 11-4-24b, 11-4-24c, 11-5-24a, 11-5-24b, 11-6-24, 11-6-24, 11-8-24, 11-12-24a, 11-12-24b, 11-12-24c, 7-25b, 3-12-25a, 3-12-25b, 3-13-25a, 3-13-25b, 11-12-24d, 11-14-24, 11-15-24a, 11-15-24b, 11-17-24a, 11-17-24b, 11-18-24, 11-19-24a, 11-19-24b, 11-20-24, 11-21-24, 11-22-24, 11-27-24, 1-2-25a, 1-2-25b, 1-2-25c, 1-7-25, 1-8-25, 1-9-25a, 1-9-25b, 1-13-25, 1-14-25, 1-15-25, 1-16-25, 1-21-25, 1-22-25, 1-23-25, 1-26-25, 1-27-25a, 1-27-25b, 1-27-25c, 1-27-25d, 1-27-25e, 1-27-25f, 1-27-25g, 1-30-25a, 1-30-25b, 1-31-25, 2-1-25, 2-2-25a, 2-2-25b, 2-2-25c, 2-3-25a, 2-3-25b, 2-4-25a, 2-4-25b, 2-5-25a, 2-5-25b, 2-5-25c, 2-5-25d, 2-6-25a, 2-6-25b, 2-7-25, 2-8-25, 2-9-25, 2-10-25a, 2-10-25b, 2-10-25c, 2-11-25a, 2-11-25b, 2-11-25b, 2-13-25, 2-14-25a, 2-14-25b, 2-15-25, 2-17-25a, 2-17-25b, 2-18-25a, 2-18-25b, 2-18-25c, 2-18-25d, 2-19-25, 2-20-25, 2-21-25a, 2-21-25b, 2-21-25c, 2-22-25, 2-23-25, 2-24-25a, 2-24-25b, 2-24-25c, 2-24-25d, 2-25-25, 2-26-25a, 2-26-25b, 2-26-25c, 2-27-25a, 2-27-25b, 2-28-25, 3-3-25, 3-4-25, 3-7-25a, 3-7-25b, 3-12-25a, 3-12-25b, 3-13-25a, 3-13-25b, 3-14-25, 3-19-25a, 3-19-25b, 3-20-25, 3-24-25, 3-26-25, 3-27-25a, 3-27-25b, 3-27-25c, 3-28-25, 3-29-25, 3-31-25a, 3-31-25b, 4-3-25, 4-6-25, 4-7-25, 4-8-25, 4-9-25, 4-10-25, 4-11-25a, 4-11-25b, 4-14-25a, 4-14-25b, 4-15-25, 4-16-25a, 4-16-25b, 4-16-25c, 4-17-25, 4-18-25a, 4-18-25b, 4-19-25, 4-22-25a, 4-22-25b, 4-25-25a, 4-25-25b, 4-26-25a, 4-26-25b, 4-28-25, 4-30-25

- KCSO Women's Center High Desert, Inc., Demographic Service Form: 6-7-24, 6-10-24, 6-11-24, 6-14-24, 6-21-24, 6-25-24a, 6-25-24b, 6-28-24a, 6-28-24b, 7-5-24, 7-9-24, 7-10-24, 7-12-24, 7-16-24, 7-19-24a, 7-19-24b, 7-20-24, 7-22-24, 7-24-24, 7-25-24, 7-29-24, 7-30-24-25, 8-9-24, 8-13-24, 8-15-24, 8-16-24, 8-19-24, 8-28-24, 9-3-24a, 9-3-24b, 9-9-24, 9-13-24, 9-17-24, 9-18-24, 9-20-24, 9-25-24, 10-10-24, 10-11-24, 10-18-24a, 10-18-24b, 10-23-24a, 10-23-24b, 10-23-24c, 10-25-24, 10-28-24, 10-29-24, 10-30-24, 11-1-24, 11-4-24, 11-12-24, 11-14-24, 11-17-24, 11-18-24, 11-19-24, 11-26-24a, 11-26-24b, 11-26-24c, 12-4-24, 13-30-24, 1-13-25, 1-15-25, 1-17-25, 1-22-25a, 1-22-25b, 1-22-25c, 1-22-25d, 1-27-25, 2-3-25, 2-10-25, 2-12-25, 2-24-25a, 2-24-25b, 2-24-25c, 3-10-25a, 3-10-25b, 3-18-25, 3-21-25, 3-26-25a, 3-26-25b, 3-28-25a, 3-28-25b, 3-31-25, 4-4-25, 4-28-25, 5-2-25, 5-6-25a, 5-6-25b, 5-7-25, 5-9-25, 5-12-25a, 5-12-25b, 5-14-25, 5-19-25, 5-20-25, 5-21-25, 5-22-25

Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Medical Staff

- Mental Health Staff
- SAFE and/or SANE Personnel of the Local Hospital/Rape Crisis Clinic
- Mailroom Staff
- Random Staff
- Just Detention International
- Community-Based Victim Advocacy Staff
- Random Inmates
- Inmates Who Disclosed Sexual Victimization During Risk Screening
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Reviewed PREA educational process.
- Reviewed PREA risk screening process.
- Review of distributed information upon Lerdo Justice Facility reception at Intake areas.
- Observed numerous PREA educational and reporting references available for incarcerated person use within incarcerated person tablets.
- Observed informational posters throughout the facility, to include incarcerated person housing areas, advising incarcerated persons of various reporting mechanisms for allegations of sexual abuse and sexual harassment.
- Observed informational posters throughout the facility advising incarcerated persons of contact information for the local rape crisis center associated with the PREA Hotline number granting access to confidential rape crisis counseling services.
- Tested PREA Hotline number incarcerated persons can use for access to confidential rape crisis counseling services.

Standard Subsections:

(A) Policy (P-550) notes that "KCSO contracts with a provider of professional rape crisis advocate counseling services for incarcerated people sexually abused or

assaulted during incarceration.” Additionally, policy (P-550) policy requires the agency to provide toll-free telephone calls to the local rape crisis advocacy/hotline. Policy (P-550) also allows that communication between incarcerated persons and advocates within these rape crisis centers is as confidential as possible. Specifically, policy (P-550) dictates that “ KCSO shall provide incarcerated people with access to outside victim advocates for ongoing emotional support services related to sexual abuse by giving incarcerated people access to a rape crisis counseling line. In addition, incarcerated people shall be provided addresses of victim advocate providers and, for persons detained solely for civil immigration purposes, designated immigrant services agencies in Kern County. KCSO shall enable reasonable communication between incarcerated people and community based services, in as confidential a manner as possible. KCSO will inform incarcerated people, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.” In speaking with Mailroom staff, it was further noted that outgoing mail to rape crisis centers may be sealed and sent to rape crisis advocates without undue prison inspection. Additionally, the agency allows local crisis advocates, specifically trained for this purpose, continuous and unimpeded access to the facility to provide incarcerated persons with emotional support related to sexual abuse and sexual harassment. As identified by the KCSO PREA Coordinator, the Lerdo Justice Facility has entered into a memorandum of understanding with a local rape crisis center; namely, the Women’s Center High Dessert, to provides advocacy services to incarcerated persons assigned to the Lerdo Justice Facility. The Lerdo Justice Facility Incarcerated Person Orientation Booklet provides contact information for this local rape crisis center. Additionally, awareness posters are displayed throughout the facility, in both English and Spanish, advising all incarcerated persons of their ability to contact this advocacy service free of charge. In excess of the standard, the Lerdo Justice Facility makes available the contact information for dozens of abuse advocacy centers throughout the United States and within the State of California. Notices of how to obtain this contact information, as well as how toll-free calls to these centers can be made, is posted in all incarcerated person housing areas. Furthermore, to assist incarcerated persons with their ability to continue counseling relationships with rape crisis centers post-release, contact information for local advocacy entities are also provided. It also includes the contact information for a local rape crisis center; namely, the Women’s Center High Dessert, Inc. During incarcerated person interviews, most were aware that contact information was provided to them via their Incarcerated Person Orientation Booklet; however, all were aware that telephone contact information was provided via the awareness posters located throughout the facility. Per the Lerdo Justice Facility PCM, the KCSO does not currently detain incarcerated persons solely for civil immigration purposes. Nonetheless, if persons were being detained solely for civil immigration purposes, the Lerdo Justice Facility would provide said persons with designated immigrant services agencies in Kern County. When interviewed, all incarcerated persons knew that the agency provided free rape crisis support services to incarcerated persons in need of such assistance. Additionally, all incarcerated persons were aware of at least one means by which they could contact rape crisis support services, with most incarcerated persons knowing that they could access those services by way of the

phone number (aka the PREA Hotline) provided via the sexual abuse awareness posters located throughout the facility and in all housing areas.

(B) Per policy (P-550) incarcerated persons are notified that calls to the rape crisis center hotline number are subject to monitoring. When interviewed, most incarcerated persons indicated their awareness, by way of the information provided on the sexual abuse posters or via the sexual abuse prevention video, that calls made to the PREA Rape Crisis Hotline were monitored. Incarcerated persons were also generally aware that conversations with rape crisis counselors were not completely anonymous and could be reported back to the facility if their discussions triggered mandatory reporting laws. To test the functionality of the PREA Rape Crisis Hotline, the auditor conducted a test of the phone number commonly referenced by incarcerated persons. This test was conducting utilizing a random phone within an incarcerated person housing area. The call was answered by a rape crisis counselor of the Women's Center High Dessert who then confirmed the line was active and functioning as required. Additionally, to ensure a functional relationship existed between Lerdo Justice Facility and rape crisis centers for which incarcerated persons might seek assistance or referrals, communication was established with both the Women's Center High Dessert and Just Detention International. Neither agency indicated that it had experienced any negative interactions with administrative staff of the Lerdo Justice Facility.

(C) The Lerdo Justice Facility has negotiated a contract between itself and Women's Center High Dessert to help provide rape crisis support services as requested by incarcerated persons assigned to the Lerdo Justice Facility. The Lerdo Justice Facility does maintain, and did supply, a contract for review.

#### Reasoning & Findings Statement:

This standard ensures that all incarcerated persons have access to outside confidential support services for sexual abuse and sexual harassment advocacy counseling. In providing this access, Lerdo Justice Facility has given incarcerated persons mailing addresses and toll-free numbers for local, State, and national victim advocacy and rape crisis organizations. The Lerdo Justice Facility does have a memorandum of understanding in effect with the Women's Center High Dessert, Inc., which is a local rape crisis center to the facility. Via written notice issue to all incarcerated persons at time of Intake into the Lerdo Justice Facility, all incarcerated persons are made aware that communications with rape crisis advocates will be monitored. In excess of the standard requirements, the Lerdo Justice Facility has also arranged a MOU with Women's Center High Dessert, Inc. to provide all incarcerated persons with continuous in-person rape crisis advocacy counseling services via

	contracted staff. When interviewed, all Lerdo Justice Facility staff and incarcerated persons were aware that the facility provided both in-person and telephonic counseling services, free of charge, for victims of sexual abuse and sexual harassment. Additionally, most incarcerated persons were aware that they could access those services by way of the rape crisis advocacy posters posted throughout the facility. With all of these factors in mind, the Lerdo Justice Facility has exceeded the minimum requirements of this standard.
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<b>115.54</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24</li> <li>• Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24</li> <li>• KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23</li> <li>• Kern County and KCSO Contract with Language Line Services, 5-28-24</li> <li>• KCSO Language Line Solutions Language Identification Guide</li> <li>• KCSO Language Line Solutions Interpretation Services Available</li> <li>• KCSO Detentions Bureau Prisoner Information Brochure, English</li> <li>• KCSO Detentions Bureau Prisoner Information Brochure, Spanish</li> <li>• KCSO Incarcerated Person Orientation Booklet, English, 7-11-24</li> </ul>



- KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24
- KCSO Incarcerated Person Acknowledgement of Grievance Procedure, English, 7-11-24
- KCSO Incarcerated Person Acknowledgement of Grievance Procedure, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Information Sheet, English
- KCSO Detentions Bureau PREA Information Sheet, Spanish
- KCSO Detentions Bureau PREA Information Sheet, Braille
- KCSO Detentions Bureau PREA Awareness Poster, English
- KCSO Detentions Bureau PREA Awareness Poster, Spanish
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, English, 7-8-22
- KCSO Detentions Bureau Notice of Telephone and Visit Monitoring Policy, Spanish, 7-8-22
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, English, 7-11-24
- KCSO Detentions Bureau PREA Holding Cell Risk Questions, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, English, 7-11-24
- KCSO Detentions Bureau PREA Facility Transfer Risk Assessment, Spanish, 7-11-24
- KCSO Incarcerated Person PREA Training Video, English
- KCSO Incarcerated Person PREA Training Video, Spanish
- KCSO PREA Inmate Education / Orientation Roster, English
- KCSO PREA Inmate Education / Orientation Roster, Spanish
- KCSO Detentions Bureau Prisoner Information Brochure, English
- KCSO Detentions Bureau Prisoner Information Brochure, Spanish
- KCSO Incarcerated Person Orientation Booklet, English, 7-11-24
- KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24
- KCSO Detentions Bureau PREA Information Sheet, English
- KCSO Detentions Bureau PREA Information Sheet, Spanish

- KCSO Detentions Bureau PREA Information Sheet, Braille
- KCSO Detentions Bureau PREA Awareness Poster, English
- KCSO Detentions Bureau PREA Awareness Poster, Spanish
- KCSO Detentions Bureau PREA Report It Poster, English
- KCSO Detentions Bureau PREA Report It Poster, Spanish
- KCSO Women's Center High Desert, Inc., Service Pamphlet, English, 9-10-18
- KCSO Women's Center High Desert, Inc., Service Pamphlet, Spanish, 9-10-18
- KCSO PREA Website Public Information and Online Reporting Instructions

#### Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Investigative Staff
- Random Inmates
- KCSO Website Third Party Reporting Coordinator
- Just Detention International
- Community-Based Victim Advocacy Staff

#### Site Review Observations:

- Observed PREA Education process.
- Observed informational posters throughout the facility, including incarcerated person housing areas, advising incarcerated persons of various reporting mechanisms for allegations of sexual abuse and sexual harassment.
- Observed PREA informational video.
- Reviewed documentation related to incarcerated person reports of sexual abuse and sexual harassment.

- Tested PREA Hotline number incarcerated persons can use to engage third-party reporting.
- Tested Security Call Button located within each two-person housing area.
- Review KCSO website specific to PREA and third-party reporting methods
- Tested KCSO online third-party reporting system.

Standard Subsections:

(A) Policy (P-450) encourages the use of third-party reporting. Specifically, policy (P-450) notes that “any third-party person may assist an incarcerated person with writing, or directly filing on an incarcerated person’s behalf a request for administrative remedy related to allegations of sexual assault/abuse provided that the incarcerated person approves of any third-party administrative remedy request filed on their behalf.” Additionally, policy (P-450) notes that “the KCSO public website provides a link to file sexual assault/abuse related reports.” In discussing reporting processes with random staff, it was understood that regardless of how staff become aware of any allegation of sexual abuse or sexual harassment, appropriate action must be taken to investigate those allegations. During interviews with the agency PREA Coordinator, it was noted that all allegations of sexual abuse or sexual harassment would be reviewed regardless of the source of that allegation. It was further noted that the agency has designed third-party reporting systems for incarcerated persons, advocates for incarcerated persons, and outside entities to make such reports on behalf of incarcerated persons. During interviews with thirty-two (32) incarcerated persons, all believed that the facility would accept, and take seriously, any allegations of sexual abuse reported by a third party, including allegations presented by other incarcerated persons. During the onsite review, signage throughout the facility encouraged incarcerated persons to third-party report if needed. As well, public notices on PREA reporting, specifically third-party reporting, were available for review by the family, friends, and advocates of incarcerated persons in the facility’s Front Lobby. Additionally, public notice on third-party PREA reporting is available to the general public on the agency’s website. Documentation specific to third-party reporting was reviewed. This documentation indicated that Lerdo Justice Facility staff would accept, and does process, third-party PREA allegations to the same extent as complaints made by affected incarcerated persons. Additionally, to test the functionality of the PREA Reporting Hotline, which could be used for third-party reports by incarcerated persons, the auditor conducted a test of the phone number commonly referenced by incarcerated persons. This test was conducted utilizing a random phone within an incarcerated person housing area. A confirmation response was received the same business day. To test the functionality of the PREA online reporting system available to the friends, family, and other advocates of incarcerated persons on the KCSO website, the auditor conducted a test of the online reporting system. This test was conducted using a random email

	<p>address not designated from the auditing agency. A confirmation response was received in a timely manner. Lastly, while incarcerated persons are not encouraged to utilize rape counseling support service centers as reporting avenues, they will also serve in this capacity if explicitly requested by the incarcerated person. With this in mind, the auditor solicited incarcerated person contact information from a rape counseling center central to the Lerdo Justice Facility and from a nationally based referral service. The referral service, Just Detention International, indicated that it did not receive any (0) complaints of sexual abuse or sexual harassment from incarcerated persons assigned to the Lerdo Justice Facility within the reporting time frame. The Women's Center High Desert, a local rape counseling advocacy service, was also contacted and asked to provide relevant information specific to the Lerdo Justice Facility PREA audit. The Women's Center High Desert indicated that it does routinely provide services to incarcerated persons assigned to the Lerdo Justice Facility. During these encounters, the Women's Center High Desert advocates did not experience any difficulties accessing or speaking with incarcerated individuals.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure the friends, family, and other advocates of incarcerated persons have at least one (1) means by which to make third-party reports of sexual abuse and sexual harassment. To ensure knowledge of this methodology, this standard also requires the agency to publicly distribute information on how to report sexual abuse and sexual harassment on behalf of an incarcerated person. To this effect, the KCSO has made third-party reporting as easily accessible as reporting by the principal party. By any method conceivable, a third-party advocate may contact any employee, contractor, or volunteer of the KCSO to make third-party reports of sexual abuse and sexual harassment. Incarcerated persons are provided information on third-party reporting, which can be used for their family and friends to advocate on their behalf, or it can be used for incarcerated persons to advocate on behalf of other incarcerated persons. Advocates for incarcerated persons are also given information on third-party reporting via institutional awareness posters publicly displayed the Lerdo Justice Facility Front Lobby. Third-party reporting information is also available to the general public on the KCSO website. Third-party reporting methods commonly used by incarcerated persons, family and friends, as well as incarcerated persons advocates were tested to ensure functionality. All methods of communication received responsive comments within a reasonable time frame. Accordingly, the KCSO, and by extension the Lerdo Justice Facility, have met the requirements of this standard.</p>
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<b>115.61</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard

## **Auditor Discussion**

### Documents:

- Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24
- Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24
- Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24
- Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24
- Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24
- Employee PREA Training PowerPoint Lesson Slides

### Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Investigative Staff
- Medical Staff
- Mental Health Staff
- First Responders
- Random Staff
- Random Inmates
- Inmates Who Reported Sexual Abuse
- Inmates Who Disclosed Sexual Victimization During Risk Screening

### Site Review Observations:

- Reviewed employee, contractor, and volunteer training records.

Standard Subsections:

(A) Agency policy (P-450) mandates that all employees must immediately report all knowledge, suspicion, or information of any sexual misconduct that occurred within the correctional institution. Specifically, policy (P-450) notes that “any staff member who has knowledge, suspicion, or information regarding an incident of sexual assault/abuse or sexual harassment; retaliation against incarcerated people or staff who reported such an incident; and any staff neglect that may have contributed to such an incident or retaliation, shall immediately report such information to a supervisor.” In speaking with twelve (12) random staff, their duty to report any awareness, or even suspicion, of sexual abuse or sexual harassment was consistently acknowledged. A review of employee, contractor, and volunteer training records, as well as training curriculum records, reflects that all persons delivering services inside of Lerdo Justice Facility have received, at the minimum, their initial PREA training, including acknowledgment of their affirmative duty to report.

(B) Agency policy (P-300, P-450) notifies all staff that any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decision, including housing, bed, work, education, and program assignments, or as required by law. Staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary. Specifically, policy (P-450) notes that “staff shall report staff misconduct through a confidential email to their immediate supervisor or section manager if the abuse involves their supervisor. Staff may also privately report directly to the PREA Coordinator or Internal Affairs Unit.” As confirmed by the Institution Investigator, employees are directed to limit their discussions of sexual abuse and sexual harassment allegations to only those authorized to know said information. Twelve (12) random staff interviews confirm that facility employees are aware of the sensitive and confidential nature of said complaints. In speaking with the Lerdo Justice Facility PCM, the totality and reasoning surrounding the confidential investigatory process was clearly explained.

(C) Agency policy (P-450) requires “medical and behavioral health practitioners shall report knowledge, suspicion, or information regarding sexual assault/abuse, sexual harassment, retaliation, or staff neglect pursuant to this section. Unless precluded by federal, state, or local law, Medical and Behavioral Health staff shall inform incarcerated people of their duty to report sexual abuse and the limits of their confidentiality at the initiation of services.” During interviews with medical and

mental health service staff, the need for said staff to inform incarcerated persons (at the initiation of professional services) of their duty to report, as well as to their limitations of confidentiality, was affirmed.

(D) Agency policy (P-450) mandates “when reporting incidents of sexual abuse, if the alleged victim may be considered a vulnerable adult (based on age, or disability as defined in DBPPM H-1200) staff shall also notify the PREA coordinator in accordance with mandatory reporting laws.” All incarcerated persons incarcerated within the Lerdo Justice Facility are legally classified as adults. As such, there are no juveniles assigned to the Lerdo Justice Facility. However, per policy (P-450), the facility may still have persons classified as vulnerable adults. As noted by the Institution Investigator, if an incarcerated person is considered a vulnerable adult, the reports of prior sexual victimization must be forwarded to the California Highway Patrol or other state/local entity that may address the needs or circumstances for said incarcerated person. During the audit time frame, Lerdo Justice Facility did not have any (0) instances of required reporting for vulnerable adults.

(E) Agency policy (P-450) mandates that all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, are referred to the Institution Investigator for processing. Specifically, policy (P-450) notes that “all staff receiving any direct or third-party report of a sexual assault, sexual abuse, sexual harassment, or retaliation for reporting sexual abuse or cooperating in a sexual abuse investigation shall follow the response protocol outlined in DBPPM P-500.” When interviewing twelve (12) random staff, all employees affirmatively responded that any reports of sexual abuse and sexual harassment received by them would be immediately referred to supervisory and/or other persons appropriate for further investigations. Documentation reviews reflect that all such reports received within the audit time frame were forwarded to the Lerdo Justice Facility Institution Investigator for review.

#### Reasoning & Findings Statement:

This standard ensures an effective and efficient response to allegations of sexual abuse and sexual harassment. Paramount to this process is the understanding that all staff and facility officials, regardless of their capacity inside the institution, have an absolute duty to report any knowledge, information, or even suspicion of sexual abuse or sexual harassment, as well as any knowledge, information, or suspicion of any retaliation having occurred for anyone who has reported allegations of sexual abuse and sexual harassment. The KCSO, and by extension, the Lerdo Justice Facility, has numerous policies in place directing staff of their reporting responsibilities. Interviews with first responders, random staff, medical staff, and mental health staff reflect their complete awareness of agency reporting requirements, to include the

	<p>confidential nature of the reporting process. Considering this, policy requires that all medical and mental health staff disclose their limits of confidentiality and obtain informed consent prior to the initiation of services. All allegations of sexual abuse and sexual harassment, to include third-party and anonymous reports, are sent to the Lerdo Justice Facility Institution Investigator for review. The Lerdo Justice Facility is an adult facility. As such, there are no (0) incarcerated persons assigned to the institution who are under the age of eighteen (18) years. However, in the event a vulnerable adult alleges sexual abuse, institution investigators are aware of their reporting duties to designated state authorities. Interviews with Lerdo Justice Facility staff expressed their compliance with agency policy. Training records and course curriculums document employee, contractor, and volunteer training specific to mandatory reporting requirements. In interviewing Lerdo Justice Facility medical and mental health staff, the process of limited confidentiality and informed consent used by said staff was explained in detail. In total, the Lerdo Justice Facility has complied with all provisions within this standard and has thus met all requirements therein.</p>
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<b>115.62</b>	<b>Agency protection duties</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24</li> <li>• Kern County Sheriff's Office, P-400, Vulnerable PREA Incarcerated People Population, 7-11-24</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Agency PREA Coordinator</li> <li>• Facility Administrator</li> </ul>



- PREA Compliance Manager
- Designated Staff Member Charged with Monitoring Retaliation
- Incident Review Team Member
- Intermediate or Higher-Level Facility Staff
- Investigative Staff
- Intake Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Medical Staff
- Mental Health Staff
- Random Staff
- Random Inmates
- Inmates Who Reported Sexual Abuse
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Review of sexual abuse and sexual harassment investigations.
- Review of retaliation monitoring documentation.

Standard Subsections:

(A) Per agency policy (P-400), when the Lerdo Justice Facility learns that an incarcerated person is subject to a substantial risk of imminent sexual abuse, agency officials have an affirmative duty to take immediate action to protect the incarcerated person. Specifically, policy (P-400) notes that “the Kern County Sheriff’s Office (KCSO) recognizes that certain incarcerated people in its custody are potentially vulnerable and at greater risk for sexual abuse or sexual harassment. KCSO shall apply the specific guidelines afforded by the PREA standards to protect at-risk or vulnerable populations from abuse.” In speaking with the Lerdo Justice Facility PCM, Lerdo Justice Facility Administrator, Lerdo Justice Facility risk screeners, and random staff, a multitude of protective measures, such as housing changes, transfers, and no contact orders, were discussed as a means of immediately increasing the safety of

	<p>incarcerated persons. During the audit time frame, however, the Lerdo Justice Facility did not find any evidence that any (0) incarcerated persons assigned to the facility were at a substantial risk of sexual abuse. As such, the facility did not have any (0) documentation for review. Likewise, no protective actions were required.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure that the Lerdo Justice Facility takes appropriate measures upon learning that any incarcerated person is subject to a substantial risk of imminent sexual abuse. Specifically, this standard requires that immediate action is taken to protect the incarcerated person. To that end, the KCSO, and by extension, the Lerdo Justice Facility, has policies in place to promote the safety of all incarcerated persons who might otherwise be victims, or potential victims, of sexual abuse and sexual harassment. Agency policy requires staff to take immediate action to ensure the safety of all incarcerated persons who are at a high risk of sexual victimization. Provided there are no other alternative options available to ensure the incarcerated person's safety, policy further allows the facility to immediately increase the safety of the at-risk incarcerated person by placing said incarcerated person in involuntary segregated housing. However, placement in involuntary segregated housing would only be used if no other general housing assignments available could ensure incarcerated person safety. During the audit time frame, the Lerdo Justice Facility did not receive any (0) reports from incarcerated persons who were at a substantial risk of sexual abuse. In interviewing random staff, all persons were asked specifically what actions would be taken if an incarcerated person presented as a high risk for sexual victimization. Unequivocally, all staff responded that they would take immediate action to protect the potential victim. Additionally, supervisory staff were questioned as to their role in this potentially dangerous situation. While supervisory staff did provide a more technical and inclusive response, they too, were centrally focused on protecting the incarcerated person. With this in mind, Lerdo Justice Facility staff have clearly articulated their responsibilities within this standard. As well, a review of investigative reports supports the fact that the Lerdo Justice Facility is committed to engaging its protection duties.</p>
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115.63	Reporting to other confinement facilities
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Documents:

- Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24
- Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24
- Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24
- Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24

Interviews:

- Agency Head
- Facility Administrator
- PREA Compliance Manager
- Inmates Who Reported Sexual Abuse
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Review of facility-to-facility referral process.

Standard Subsections:

(A) Agency policy (P-450) requires that "if KCSO receives information that a sexual assault had occurred at another confinement facility, it has the duty to report the incident to that confinement facility." In speaking with the Lerdo Justice Facility Administrator, adherence to this policy was confirmed. A review of documents within the audit time frame reflects that there have not been any (0) such referrals made from Lerdo Justice Facility to another facility. As such, there wasn't any documentation to review.

(B) Agency policy (P-450) requires that any "notification shall be made within 72 hours of the allegation." The Lerdo Justice Facility Administrator confirmed that all

notices are sent by the Facility Administrator's Office to the destination facility as soon as possible, but certainly within 72 hours. A review of documents within the audit time frame reflects that there have not been any (0) such referrals made from Lerdo Justice Facility to another facility. As such, there wasn't any documentation to review.

(C) Agency policy (P-450) requires that the notification is documented. Specifically, policy (P450) requires that the "section manager shall ensure a JMS incident is written." In speaking with the Lerdo Justice Facility Administrator, adherence to this policy was confirmed. A review of documents within the audit time frame reflects that there have not been any (0) such referrals made from Lerdo Justice Facility to another facility. As such, there wasn't any documentation to review.

(D) Agency policy (P-450) requires "if KCSO receives information that a sexual assault had occurred at another confinement facility, it has the duty to report the incident to that confinement facility." In speaking with the Lerdo Justice Facility administrator and Lerdo Justice Facility Institution Investigator, adherence to this policy was confirmed. A review of documents within the audit time frame reflects that there have not been any (0) such referrals made from Lerdo Justice Facility to another facility. As such, there wasn't any documentation to review.

#### Reasoning & Findings Statement:

This standard requires the timely communication of sexual abuse and sexual harassment across facilities within a correctional agency or even across agencies themselves. The KCSO has policies in place to ensure that its staff, as well as the staff from other possible agencies, are provided sufficient due process with respect to the timely notification of incarcerated person allegations involving sexual abuse and sexual harassment. Within the audit time frame, the Lerdo Justice Facility has not received any (0) incoming allegations of sexual abuse and sexual harassment from incarcerated persons who reported such at other facilities. Within the audit time frame, the Lerdo Justice Facility has not received any (0) outgoing allegations of sexual abuse and sexual harassment from incarcerated persons who reported to Lerdo Justice Facility staff that such an incident occurred at another facility. In speaking with the Lerdo Justice Facility Administrator, however, a detailed explanation of this process, to include required reporting timelines for use when necessary, was provided. Hence, agency policy, documentation review, and an in-depth explanation of the collaborative notification process all reflect that the Lerdo Justice Facility has satisfied the provisions of this standard.

115.64	Staff first responder duties
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24</li> <li>• Employee PREA Training PowerPoint Lesson Slides</li> <li>• KCSO Contractor, Volunteer, and KCSO Civilian Staff PREA Training PowerPoint Lesson Slides</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> <li>• Investigative Staff</li> <li>• Intermediate or Higher-Level Facility Staff</li> <li>• Random Staff</li> <li>• First Responders</li> <li>• Random Inmates</li> <li>• Inmates Who Reported Sexual Abuse</li> <li>• Inmates Who Disclosed Sexual Victimization During Risk Screening</li> </ul>

Site Review Observations:

- Review of employee training records.
- Review of investigator narrative case files.

Standard Subsections:

(A) Agency policy (P-500) requires the first responding security staff member to immediately “identify and separate any victim(s) from any known or potential suspect(s).” After ensuring the safety of the victim, policy (P-500) requires staff to “restrict access to and secure any potential crime scene(s); begin completing a KCSO Crime Scene Log; identify any possible witnesses; ensure all involved incarcerated people are secured both from sight and sound; advise victim not to eat, drink, brush teeth, change clothes, or use the toilet in order to preserve potential evidence; secure suspect(s) in area without water access for limited amount of time.” Interviews with twelve (12) random staff and security first responders evidenced an overall understanding of policy. Within the audit time frame, Lerdo Justice Facility has received twenty (20) allegations from incarcerated persons who claim to have been victims of sexual abuse. Per the Lerdo Justice Facility PCM, when Lerdo Justice Facility security staff were notified within a time period that still allowed for the collection of physical evidence, security staff members did take appropriate action to preserve and protect the crime scene, as well as any physical evidence available for collection. Documentation review confirms that first responding security staff members do take appropriate action to mitigate further allegations of sexual abuse, along with preserving and protecting any possible evidence that might still be available for collection from both the victim and the alleged abuser.

(B) Agency policy (P-100, P-200, P-300, P-450) requires that when non-security staff become aware of sexual abuse, they must notify a security staff member or a supervisor immediately, as well as take necessary actions to ensure the safety of the incarcerated person. When interviewing a non-security first responder, the role of that individual within the reporting process was recalled. In that, adherence to agency policy was maintained. Within the audit time frame, Lerdo Justice Facility received twenty (20) allegations from incarcerated persons who claim to have been victims of sexual abuse. Per the Lerdo Justice Facility PCM, of the allegations made to non-security staff, all such staff did follow appropriate protocols for both notifying security staff and taking appropriate action to ensure the safety of the incarcerated person. Documentation review confirms that the first responding non-security staff member did take appropriate action to mitigate further allegations of sexual abuse, preserve

	<p>and protect any possible evidence, and to immediately notify security staff of the allegations.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure both security and non-security staff understand their role in responding to allegations of sexual abuse. Agency policy clearly describes the function of each first responder, with security and non-security staff being equally responsible for separating the alleged victim and abuser, as well as preserving and protecting any possible evidence either at the scene or on the victim. Interviews with first responders reflect that both security and non-security staff have been trained on those responsibilities. As well, during contractor and volunteer interviews, it was noted that all contractors and volunteers understood the absolute need to protect the victim, as well as a need to preserve and protect the crime scene or evidence that could be available. A review of employee, contractor, and volunteer training records and class curriculums reflect staff have received required training specific to the preservation of evidence regarding allegations of sexual abuse and sexual harassment. Lerdo Justice Facility documentation in response of allegations of sexual abuse also reflects staff awareness of their responsibilities when responding to such allegations. As such, the Lerdo Justice Facility has satisfied all requirements of this standard.</p>
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115.65	Coordinated response
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24</li> <li>• PREA Response Contact Phone Numbers, 12-3-24</li> <li>• KCSO Women's Center High Desert, Inc., Service Pamphlet, English, 9-10-18</li> <li>• KCSO Women's Center High Desert, Inc., Service Pamphlet, Spanish, 9-10-18</li> </ul>

- KCSO Victim's Informational Pamphlet, Marsy's Card, English
- KCSO Victim's Informational Pamphlet, Marsy's Card, Spanish
- KCSO Sexual Assault Survivor's Bill of Rights, English, 10/18
- KCSO Sexual Assault Survivor's Bill of Rights, Spanish, 10/18

#### Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Designated Staff Member Charged with Monitoring Retaliation
- Incident Review Team Member
- Intermediate or Higher-Level Facility Staff
- Investigative Staff
- Medical Staff
- Mental Health Staff
- SAFE and/or SANE Personnel of the Local Hospital/Rape Crisis Clinic
- Random Staff

#### Site Review Observations:

- Review of facility level procedures.

#### Standard Subsections:

- The Lerdo Justice Facility has developed written institutional plans; namely, P-500, Sexual Assault/Abuse Security Response Plan and P-550, Victim Services Response Plan, to coordinate actions taken amongst staff, contractors, volunteers, first responders, medical staff, mental health staff, investigators, facility leadership,



	<p>and local rape crisis advocacy staff in response to alleged incidents of sexual abuse.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure the facility has developed a calculated response plan to assist first responders and supervisory staff in the immediate processes needed for an effective and efficient response to allegations of sexual abuse. As required by this standard, the Lerdo Justice Facility has developed a written institutional plans; namely, P-500, Sexual Assault/Abuse Security Response Plan and P-550, Victim Services Response Plan, to coordinate actions taken amongst staff, contractors, volunteers, first responders, medical staff, mental health staff, investigators, facility leadership, and local rape crisis advocacy staff in response to alleged incidents of sexual abuse. Within these response plans, the roles of all facility staff and contracted staff are discussed and, perhaps even more importantly, the way those roles interact with one another are outlined. When asked, various departmental staff were able to articulate their role within the response plan. Also, during incarcerated person interviews, many were able to specify the responsibilities of responding staff. As such, the Lerdo Justice Facility has met the requirements of this standard.</p>
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<b>115.66</b>	<b>Preservation of ability to protect inmates from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Agency Head</li> <li>• Agency Contract Administrator</li> </ul>

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager
- Administrative (Human Resources) Staff
- Inmates Who Reported Sexual Abuse
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Reviewed agency labor contracts.

Standard Subsections:

(A) Agency policy (P-200) does not allow any governmental entity responsible for collective bargaining to limit the agency's ability to remove alleged staff sexual abusers from contact with incarcerated persons pending the outcome of an investigation or of a determination of whether, and to what extent, discipline is warranted. Specifically, policy (P-200) notes that "KCSO is an agency of the County of Kern and bound by County civil service ordinances. The County of Kern conducts collective bargaining for all County agencies and their respective employee bargaining units. The County collectively bargains with Kern Law Enforcement Association (KLEA), Kern County Detention Officer Association (KCDOA) and Service Employees International Union (SEIU) for issues related to employee pay, leave time, health benefits, uniform allowances. No issues related to employee discipline are negotiated as part of the collective bargaining process." This ensures that the KCSO retains the management rights to remove alleged staff sexual abusers from contact with incarcerated persons pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.

(B) The auditor is not required to audit this provision.

Reasoning & Findings Statement:

This standard requires that an agency continuously preserve its ability to protect

	<p>incarcerated persons from having contact with persons who may have sexually abused them pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. The KCSO has met this responsibility. Agency policy allows employees to be subject to disciplinary sanctions up to and including termination for violating KCSO sexual misconduct policies. Additionally, the KCSO is a law enforcement agency. Hence, terminations for violations of KCSO sexual misconduct policy, or resignations by staff that would have been terminated if not for their resignation, are reported to law enforcement agencies and reported to any relevant licensing bodies. In speaking with the Lerdo Justice Facility Administrator, the process of suspending or separating an employee from employment as a function of a negative sexual abuse or sexual harassment investigation finding was explained. It was also noted that the KCSO; and more specifically, the Lerdo Justice Facility unit administration, has no reservations about discharging employees for engaging in sexual abuse and sexual harassment. Hence, the Lerdo Justice Facility has satisfactorily met the requirements of this standard.</p>
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<b>115.67</b>	<b>Agency protection against retaliation</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24</li> <li>• Retaliation Monitoring Log, June 2024 – June 2025</li> <li>• KCSO PREA Victim Monitoring: 6-23-24, 12-2-24, 1-25-25, 2-18-25a, 2-18-25b</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Agency PREA Coordinator</li> </ul>

- Facility Administrator
- PREA Compliance Manager
- Institutional Investigator
- Designated Staff Member Charged with Monitoring Retaliation
- Random Staff
- Random Inmates
- Inmates Who Reported Sexual Abuse
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Reviewed sexual abuse/harassment investigative case files.
- Reviewed retaliation monitoring logs.

Standard Subsections:

(A) Agency policy (P-100) requires the Lerdo Justice Facility to ensure “reports of sexual abuse, or harassment of one incarcerated person by another incarcerated person, or retaliation towards an incarcerated person by another incarcerated person for reporting or cooperating in an investigation of sexual abuse or harassment will be investigated and referred for prosecution when appropriate in accordance with the PREA reporting policy.” In speaking with the Lerdo Justice Facility PCM, it was confirmed that the Lerdo Justice Facility PCM monitors all retaliation resulting from allegations of sexual abuse or sexual harassment. Documentation review for retaliation monitoring supports adherence to agency policy.

(B) Per policy (P-450), the institution shall employ multiple protection measures for incarcerated persons and staff who fear retaliation for reporting sexual misconduct or for cooperating with investigations. At a minimum, these protection measures will include “classification changes; housing or facility transfers; staff re-assignment; victim advocate services.” In speaking with the Lerdo Justice Facility PCM, adherence to agency policy was confirmed. Additionally, documentation review for retaliation monitoring supports facility adherence to agency policy.

(C) Agency policy (P-450) requires that “or at least 90 days following a report of sexual abuse, the PREA Manager assigned to the compliance section shall monitor the conduct and treatment of; incarcerated people or staff who reported sexual assault/abuse; incarcerated people who were reported to have suffered sexual assault/abuse. Items to be monitored include: incarcerated person disciplinary reports; housing assignments; program changes; negative performance reviews.” If evidence is found to suggest retaliation, immediate action must be taken to remedy any such retaliation. In speaking with the Lerdo Justice Facility PCM, adherence to agency policy was confirmed. As well, retaliation monitoring can continue beyond 90 days if there is a continuing need for such monitoring. Documentation review for retaliation monitoring supports facility adherence to agency policy. Lastly, per the Lerdo Justice Facility PCM, there have not been any (0) incidents of retaliation during the audit time frame.

(D) Agency policy (P-450) requires “periodic status checks of the incarcerated person.” In speaking with the Lerdo Justice Facility PCM, adherence to agency policy was confirmed. Additionally, documentation review for retaliation monitoring supports facility adherence to agency policy.

(E) Agency policy (P-450) mandates “KCSO policy is to protect all incarcerated people and staff who report sexual assault/abuse or sexual harassment or cooperate with sexual assault/abuse or sexual harassment investigations from retaliation by other incarcerated people or staff.” In speaking with the Lerdo Justice Facility PCM, it was further noted if any individual who cooperates with an investigation expresses a fear of retaliation, appropriate measures would be taken to protect that individual against retaliation. Documentation review for retaliation monitoring supports facility adherence to agency policy.

(F) The auditor is not required to audit this provision.

#### Reasoning & Findings Statement:

This standard works to ensure agency protection against retaliation for reporting sexual abuse and sexual misconduct, as well as having cooperated with an investigation regarding such. To ensure this end, the KCSO has developed policies to ensure an active retaliation monitoring system, which provides for in-person status checks of incarcerated persons. As a function of the retaliation monitoring process, the KCSO has enacted multiple protections measures for early onset detection of retaliation should it ever occur. During the audit time frame, however, the Lerdo

	<p>Justice Facility has not experienced any (0) such incidents of retaliation. In speaking with the Lerdo Justice Facility PCM, the responsibilities of the retaliation monitoring process, which does include in-person status checks for incarcerated persons, was clearly explained. Additionally, in speaking with an incarcerated person who had filed a previous allegation of sexual abuse, that individual did not report having experienced retaliation for participating in a sexual abuse facility investigation. Documentation review reflects that Lerdo Justice Facility staff are performing retaliation monitoring in accordance to policy. Given the totality of the policies provided, document review, and staff knowledge regarding the process, the Lerdo Justice Facility has satisfied the requirements of this standard.</p>
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<b>115.68</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, K-400, Administrative Separation, 7-11-24</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> <li>• Designated Staff Member Charged with Monitoring Retaliation</li> <li>• Random Staff</li> <li>• Staff Who Supervise Inmates in Segregated Housing</li> <li>• Random Inmates</li> <li>• Inmates Who Reported Sexual Abuse</li> <li>• Inmates Who Disclosed Sexual Victimization During Risk Screening</li> </ul>

Site Review Observations:

- Observed involuntary segregated housing.

Standard Subsections:

(A) Agency policy (K-400) notes that “administrative separation shall not be used as a means of punishment or discipline.” Policy (K-400) further notes “incarcerated persons likely to need protection from other incarcerated persons, including those at risk for sexual abuse, or recently abused, may be housed in administrative separation if no other alternative exists.” As noted by the Lerdo Justice Facility PCM, within the audit time frame, the Lerdo Justice Facility has not placed any (0) incarcerated persons who have alleged sexual abuse or who are at a high risk of sexual abuse into involuntary segregated housing pending completion of a PREA risk assessment. It was further noted that if such housing were needed, the incarcerated person would be housed was stipulated with Standard 115.43.

Reasoning & Findings Statement:

The standard works to ensure that incarcerated persons reporting allegations of sexual abuse are not simply segregated as an automatic response for ensuring their physical safety. To this effect, the KCSO has policies in place prohibiting the placement of incarcerated persons who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been reached that there is no available alternative means of separation from likely abusers. Additionally, the KCSO has policies in place requiring that if an involuntary segregated housing assignment is made, the facility must review each incarcerated person every 30 days to determine whether there is a continuing need for separation from the general population. Interviews with the Lerdo Justice Facility Administrator and the Lerdo Justice Facility PCM did acknowledge that when no other alternatives existed, incarcerated persons would be placed in involuntary segregated housing. However, it was noted that the use involuntary segregated housing would be considered only as the last available option, and even at that, only as a temporary measure. During the audit time frame, the Lerdo Justice Facility did not place any (0) incarcerated person alleging sexual abuse or sexual harassment within involuntary segregated housing. Also, in speaking with an incarcerated person who filed a previous allegation of sexual abuse, that individual did not report having been placed in involuntary segregated housing as a consequence of filing the report. As such, the Lerdo Justice Facility has satisfied the

	requirements of this provision.
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<b>115.71</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-600, PREA Criminal and Administrative Investigations, 7-11-24</li> <li>• Kern County Sheriff's Office, C-1320, Criminal Complaint: General Policy, 7-11-24</li> <li>• KCSO Training Division Training Order, Course Title: Seniors Specialized Investigators, 2023</li> <li>• KCSO PREA Investigator Training Completion Section Roster, 7-5-25</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Agency PREA Coordinator</li> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> </ul>



- Investigative Staff
- Inmates Who Reported Sexual Abuse
- Inmates Who Disclosed Sexual Victimization During Risk Screening

Site Review Observations:

- Reviewed investigator training certifications.
- Reviewed agency training records documenting investigator training curriculums.
- Reviewed twelve (12) sexual abuse/sexual harassment case files.

Standard Subsections:

(A) Agency policy (C-1320) requires that “when criminal activity is suspected, investigate and write a crime and incident report prior to the end of the shift on which the activity occurred.” With this in mind, policy (C-1320) clearly expects that investigations into allegations of sexual abuse and sexual harassment are completed promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. In speaking with the Lerdo Justice Facility Institution Investigator and Lerdo Justice Facility PCM, adherence to agency policy was confirmed. Documentation review further supports that all investigations were completed as required by policy and within the designated time limits.

(B) Per policy (P-300), all employees receive training related to the prevention, detection, response, and investigation of sexual misconduct. Also, policy (P-300) requires that “in addition to the general training provided to all employees, KCSO will ensure that staff who conduct sexual assault and abuse investigations receive training in conducting such investigations in confinement settings” In interviewing Lerdo Justice Facility investigative staff, said staff confirmed participation in numerous related courses. Additionally, training curriculums and employee training certifications provided additional documentation to support facility compliance.

(C) Agency policy (P-600) requires that “investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged

victims, and witnesses; and shall review prior complaints and reports of sexual abuse involving the victim and suspected perpetrator(s).” In speaking with the Lerdo Justice Facility Institution Investigator and the Lerdo Justice Facility PCM, adherence to agency policy was confirmed. Documentation review further supports that all investigations were completed as required by policy, to include the collection and review of all relevant evidence.

(D) Agency policy (P-600) mandates that “KCSO will not conduct any compelled interviews until after all criminal proceedings are completed, or the District Attorney has declined to file the complaint.” In speaking with the Lerdo Justice Facility Institution Investigator, it was noted that communications with the District Attorney’s Office were continuous. Documentation review further supports that all investigations were completed as required by policy, to include the collection and review of all relevant evidence.

(E) Agency policy (P-600) requires that “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 incarcerated person or staff. No agency shall require an incarcerated person 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.” The Lerdo Justice Facility Institution Investigator confirms that the credibility of the interviewed subject is, in fact, determined on an individual basis considering the totality of the evidence presented. Documentation review further supports that all investigations were completed as required by policy, to include the credibility assessments being made based on an objective review of the available evidence.

(F) Agency policy (P-600) requires that administrative investigations “shall include an effort to determine whether staff actions or failures to act contributed to the abuse or if there were policy violations; and shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.” The Lerdo Justice Facility Institution Investigator and the Lerdo Justice Facility PCM both confirm that staff actions, or their failure to act, are considered as a routine function of the investigative process. Documentation review further supports that all investigations were completed as required by policy, to include descriptive details of the investigation and factors influencing objective reviews.

(G) Agency policy (P-600) requires that all criminal investigations “shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary

evidence where feasible.” Interviews with the Lerdo Justice Facility Institution Investigator, as well as reviewed documentation, supports the facility’s adherence to this policy.

(H) Agency policy (P-600) requires that “substantiated allegations of conduct that appears to be criminal shall be referred for prosecution assuming they fall within the statute of limitations.” Interviews with the Lerdo Justice Facility Institution Investigator and the Lerdo Justice Facility PCM, as well as reviewed documentation, supports the facility’s adherence to this policy. During the audit time frame, the Lerdo Justice Facility has not referred any (0) such cases for prosecution.

(I) Agency policy (P-600) requires that “the agency shall retain all written reports for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.” In speaking with the Lerdo Justice Facility Institution Investigator, adherence to agency policy was confirmed.

(J) Agency policy (P-600) mandates that “the departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.” Interviews with the Lerdo Justice Facility Institution Investigator and the Lerdo Justice Facility PCM, as well as reviewed documentation, supports the facility’s adherence to this policy.

(K) The auditor is not required to audit this provision.

(L) Interviews with the Lerdo Justice Facility Institution Investigator and the Lerdo Justice Facility PCM confirm that if an outside agency were to investigate sexual abuse within the facility, the facility would cooperate with outside investigators and endeavor to remain informed about the progress of the investigation.

#### Reasoning & Findings Statement:

This standard works to encourage objective investigations of sexual abuse and sexual harassment allegations. In doing so, it is absolutely necessary that sexual abuse and sexual harassment investigations, including investigations initiated by a third-party or anonymously, are completed promptly, thoroughly, and efficiently. To work as a criminal investigator within the KCSO, personnel must have law enforcement credentials. As well, to perform criminal or administrative investigations, Lerdo Justice Facility investigative staff must also have met additional training requirements for

	conducting sexual abuse and sexual harassment investigations within a confinement setting. Lerdo Justice Facility Institution Investigators have been trained on the standard of evidence, as well as due process and procedural requirements required to support findings of guilt in both administrative and criminal investigations. Lastly, it is noted that all sexual abuse and sexual harassment investigations are referred to Lerdo Justice Facility Institution Investigators, who have the authority to conduct criminal investigations. As such, the Lerdo Justice Facility has met the requirements of this standard.
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115.72	Evidentiary standard for administrative investigations
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-600, PREA Criminal and Administrative Investigations, 7-11-24</li> <li>• Kern County Sheriff's Office, C-1320, Criminal Complaint: General Policy, 7-11-24</li> <li>• KCSO Training Division Training Order, Course Title: Seniors Specialized Investigators, 2023</li> <li>• KCSO PREA Investigator Training Completion Section Roster, 7-5-25</li> </ul> <p>Interviews:</p>

- Facility Administrator
- PREA Compliance Manager
- Investigative Staff
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Reviewed procedures for processing sexual abuse/sexual harassment allegations.
- Reviewed twelve (12) sexual abuse and sexual harassment case files.

Standard Subsections:

- Agency policy (P-600) clearly establishes that “investigations shall be conducted utilizing standard investigation methods in accordance with all laws. No standard higher than a preponderance of the evidence shall be used in determining whether allegations of sexual abuse or sexual harassment are substantiated in administrative investigations.” In speaking with the Lerdo Justice Facility Institution Investigator, administrative investigations are determined substantiated, unsubstantiated, or unfounded based on the preponderance of the evidence. For substantiated claims, this simply means that the weight of the evidence must indicate that the allegations are more likely to be true than not true. Documentation review confirms facility compliance with agency standards.

Reasoning & Findings Statement:

This standard works to ensure an objective evidentiary standard for administrative investigations. KCSO policy does require that investigative staff impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. In speaking with the Lerdo Justice Facility Institution Investigator, it was noted that standard is simply more than half. Documentation review supports the facility’s adherence to agency policy. Accordingly, the Lerdo Justice Facility has met the requirement of this standard.

115.73	Reporting to inmates
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-450, Reporting Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-500, Sexual Assault/Abuse Security Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-550, Victim Services Response Plan, 7-11-24</li> <li>• Kern County Sheriff's Office, P-600, PREA Criminal and Administrative Investigations, 7-11-24</li> <li>• Kern County Sheriff's Office, C-1320, Criminal Complaint: General Policy, 7-11-24</li> <li>• KCSO Training Division Training Order, Course Title: Seniors Specialized Investigators, 2023</li> <li>• KCSO PREA Investigator Training Completion Section Roster, 7-5-25</li> <li>• KCSO PREA Incident Findings Notification, English, 7-11-24</li> <li>• KCSO PREA Incident Findings Notification, Spanish, 7-11-24</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> <li>• Designated Staff Member Charged with Monitoring Retaliation</li> </ul>

- Investigative Staff
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Reviewed procedures for processing sexual abuse and sexual harassment allegations.
- Reviewed twelve (12) sexual abuse and sexual harassment investigative case files.

Standard Subsections:

(A) Agency policy (P-600) requires that upon completion of an investigation into allegations of sexual abuse or sexual harassment, notifications “shall be attempted or made to the incarcerated person unless released from custody. All notifications or attempts shall be documented on a PREA Incident Findings Notification (Attachment ‘A’), and include whether the allegation has been substantiated, unsubstantiated or unfounded.” In speaking with the Lerdo Justice Facility Institution Investigator, adherence to agency policy was confirmed. In speaking with one (1) incarcerated person who filed an allegation of sexual abuse, this person did confirm that a written notification of the investigation’s disposition was received. Additionally, documentation review confirms incarcerated persons are provided notice of the disposition, of which they sign to acknowledge the notification process.

(B) Interviews with the Lerdo Justice Facility Institution Investigator and the Lerdo Justice Facility PCM confirm that if an outside agency were to investigate sexual abuse within the facility, the facility would request the relevant information from the outside agency to inform incarcerated persons of the final disposition to their allegation.” During the audit timeframe, there have not been any (0) outside agencies conduct investigations within the Lerdo Justice Facility. Documentation review confirms incarcerated persons are provided notice of the disposition, of which they sign to acknowledge the notification process.

(C) Agency policy (P-600) requires that “unless a sexual abuse allegation against staff was determined to be unfounded and absent any legal restriction, KCSO shall notify incarcerated people reporting staff sexual abuse of the investigation findings, and whenever:

- The staff member is no longer posted within the incarcerated person's unit;
- The staff member is no longer employed at the facility;
- The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

In speaking with the Lerdo Justice Facility Institution Investigator, adherence to agency policy was confirmed.

(D) Agency policy (P-600) requires that "following an incarcerated person's allegation of abuse by another incarcerated person, KCSO shall inform the alleged victim whenever:

- The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

In speaking with the Lerdo Justice Facility Institution Investigator, adherence to agency policy was confirmed.

(E) Agency policy (P-600) requires that "all notifications or attempts shall be documented on a PREA Incident Findings Notification (Attachment 'A'), and include whether the allegation has been substantiated, unsubstantiated or unfounded." In speaking with the Lerdo Justice Facility Institution Investigator, adherence to agency policy was confirmed. Additionally, documentation review confirms incarcerated persons are provided documented notice of the disposition, of which they sign to acknowledge the notification process.

(F) Auditor is not required to audit this provision.

Reasoning & Findings Statement:

This standard works to ensure incarcerated persons are provided notification of final disposition to any allegations of sexual abuse and sexual harassment that have been reported to agency staff. KCSO policy requires these notifications to be documented. The Lerdo Justice Facility Institution Investigator and the Lerdo Justice Facility PCM



	<p>confirm providing written notifications to incarcerated persons when their allegations are determined substantiated, unsubstantiated, or unfounded. Additionally, Lerdo Justice Facility investigative staff confirm having informed incarcerated persons who had filed substantiated sexual abuse and sexual harassment allegations against agency staff or other incarcerated persons upon a change in the housing status for the abusive incarcerated person, a change in job status for the abusive employee, as well as the indictment or conviction of either person related to sexual abuse within the institution. Within the audit time frame, Lerdo Justice Facility documentation reflects incarcerated persons are notified in writing of the final disposition to sexual abuse and sexual harassment claims as required by policy. Also, in speaking with an incarcerated person who had previously filed a sexual abuse complaint, the notification process was further confirmed. As such, the Lerdo Justice Facility is operating in accordance with all parts of this standard.</p>
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<b>115.76</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-900, PREA Hiring, Promoting and Discipline, 7-11-24</li> <li>• Employee PREA Training PowerPoint Lesson Slides</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> <li>• Investigative Staff</li> </ul>

- Random Staff
- Inmates Who Reported Sexual Abuse

Site Review Observations:

- Review of staff disciplinary protocols for sexual abuse and sexual harassment determinations

Standard Subsections:

(A) Agency policy (P-900) clearly advises staff that “KCSO shall appropriately discipline staff for substantiated allegations of sexual abuse or sexual harassment. Substantiated sexual abuse by a KCSO staff member shall be grounds for termination.” In speaking with Human Resource staff, termination for violating agency sexual abuse and sexual harassment policies is the presumptive disciplinary sanction. Interviews with the Lerdo Justice Facility Administrator, the Lerdo Justice Facility PCM, and the Lerdo Justice Facility Institution Investigator confirm their awareness of agency policy and willingness to pursue disciplinary action against any Lerdo Justice Facility employee who engages in sexual abuse and sexual harassment of incarcerated persons assigned to the Lerdo Justice Facility. Interviews with twelve (12) random staff reflect employee awareness of the KCSO’s zero-tolerance policies for engaging in sexual abuse and sexual harassment of incarcerated persons.

(B) Agency policy (P-900) advises all personnel that any perpetrator of a sexual abuse or sexual harassment will be dealt with through discipline or prosecution to the fullest extent permitted by law. As noted by Human Resource staff, termination is the presumptive disciplinary sanction for staff who engage in sexual abuse of an incarcerated person. Within the audit time frame, there had not been any (0) employees who have been terminated, or resigned prior to termination, due to having engaged inappropriate sexual relationships with incarcerated persons.

(C) Agency policy (P-900) stipulates that “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.” Interviews with the Lerdo Justice Facility Administrator, the Lerdo Justice Facility PCM, the Lerdo Justice Facility Institution Investigator, as well as Human Resource staff confirm their

	<p>adherence to agency policy specific to employee disciplinary and termination processes for any employee found to be engaging in acts of sexual abuse or sexual harassment (other than actually engaging in sexual abuse). Within the audit time frame, there has not been any (0) employees assigned to the Lerdo Justice Facility disciplined for violation of agency policy related to sexual abuse or sexual harassment (other than actually engaging in sexual abuse).</p> <p>(D) Agency policy (P-900) requires that “all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff in lieu of termination, shall be reported to any relevant licensing bodies, unless the activity was clearly not criminal.” Interviews with the Lerdo Justice Facility Administrator, the Lerdo Justice Facility PCM, the Lerdo Justice Facility Institution Investigator, as well as Human Resource staff confirm their adherence to agency policy specific to employee disciplinary and termination processes for any employee found to be engaging in acts of sexual abuse or sexual harassment. Within the audit time frame, there have not been any (0) employees assigned to the Lerdo Justice Facility disciplined for violations of agency policy related to sexual abuse or sexual harassment.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure staff who engage in sexual abuse and sexual harassment of incarcerated persons are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse and sexual harassment policies. The KCSO has made the consequences of engaging in sexual abuse and sexual harassment of incarcerated persons exceptionally clear. During interviews with employees, contractors, volunteers, and incarcerated persons, all such persons were aware of the agency’s zero-tolerance policy against sexual abuse and sexual harassment. During the audit time frame, there had not been any (0) employees of the Lerdo Justice Facility who have violated any aspects of the agency’s sexual abuse or sexual harassment policies. In total, the Lerdo Justice Facility has satisfied all requirements of this standard.</p>
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<b>115.77</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Documents:

- Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24
- Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24
- KCSO Contractor, Volunteer, and KCSO Civilian Staff PREA Training PowerPoint Lesson Slides

#### Interviews:

- Agency Contract Administrator
- Facility Administrator
- Investigative Staff
- Administrative (Human Resources) Staff
- Contractors Who May Have Contact with Inmates
- Volunteers Who May Have Contact with Inmates

#### Site Review Observations:

- Review contractor/volunteer files.

#### Standard Subsections:

(A) Agency policy (P-900) requires that "KCSO shall terminate services from any contractor or volunteer for any substantiated allegation of sexual abuse involving an incarcerated person. Any contractor or volunteer who engages in sexual abuse of an incarcerated person shall be prohibited from contact with incarcerated people and shall be reported to law enforcement agencies. Such conduct shall be reported to relevant licensing bodies." Interviews with contractors and volunteers indicate their awareness of the agency's zero-tolerance policy toward sexual abuse and sexual harassment of incarcerated persons. A review of contractor/volunteer files, as well as sexual abuse and sexual harassment training materials indicates that all such persons receive training specific to agency policy regarding zero-tolerance for sexual abuse and sexual harassment of incarcerated persons. During the audit time frame,

	<p>there have not been any (0) contractors or volunteers with substantiated allegations of sexual abuse involving incarcerated persons. As such, there have not been any (0) contractors or volunteers reported to law enforcement, or relevant licensing body, for engaging in sexual abuse of incarcerated persons.</p> <p>(B) Agency policy (P-900) states that “KCSO shall terminate services from any contractor or volunteer for any substantiated allegation of sexual abuse involving an incarcerated person. In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, the facility shall take appropriate remedial measures, and shall consider whether to prohibit all further contact by the contractor or volunteer with incarcerated people.” Interviews with contractors and volunteers indicate their awareness of the agency’s zero-tolerance policy toward sexual abuse and sexual harassment of incarcerated persons. A review of contractor/volunteer files, as well as sexual abuse and sexual harassment training materials indicates that all such persons receive training specific to agency policies regarding zero-tolerance for the sexual abuse and sexual harassment of incarcerated persons. During the audit time frame, there have not been any (0) contractors or volunteers with any other violations of agency sexual abuse or sexual harassment policies involving an incarcerated person. As such, there have not been any (0) contractors or volunteers reported to law enforcement, or relevant licensing body, for engaging in sexual abuse of incarcerated persons.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure contractors and volunteers who engage in sexual abuse and sexual harassment of incarcerated persons are reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. The KCSO has made the consequences of engaging in sexual abuse and sexual harassment of incarcerated persons exceptionally clear. During interviews with employees, contractors, volunteers, and incarcerated persons, all such persons were aware of the agency’s zero-tolerance policy against sexual abuse and sexual harassment. During the audit time frame, there have not been any (0) contractors or volunteers with substantiated allegations of sexual abuse involving incarcerated persons. As such, there have not been any (0) contractors or volunteers reported to law enforcement, or relevant licensing body, for engaging in sexual abuse of incarcerated persons. Accordingly, the Lerdo Justice Facility has satisfied all requirements of this standard.</p>
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	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"><li>• Kern County Sheriff’s Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li><li>• Kern County Sheriff’s Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li><li>• KCSO Detentions Bureau Prisoner Information Brochure, English</li><li>• KCSO Detentions Bureau Prisoner Information Brochure, Spanish</li><li>• KCSO Incarcerated Person Orientation Booklet, English, 7-11-24</li><li>• KCSO Incarcerated Person Orientation Booklet, Spanish, 7-11-24</li><li>• KCSO Detentions Bureau PREA Information Sheet, English</li><li>• KCSO Detentions Bureau PREA Information Sheet, Spanish</li><li>• KCSO Detentions Bureau PREA Information Sheet, Braille</li><li>• California Sexual Assault Penal Codes, 2025</li></ul> <p>Interviews:</p> <ul style="list-style-type: none"><li>• Facility Administrator</li><li>• PREA Compliance Manager</li><li>• Investigative Staff</li><li>• Medical Staff</li><li>• Mental Health Staff</li><li>• Random Staff</li><li>• Random Inmates</li></ul> <p>Site Review Observations:</p>

- Review of incarcerated person disciplinary files.

Standard Subsections:

(A) Agency policy (P-100) notes that “the Kern County Sheriff’s Office (KCSO) is committed to zero-tolerance of any form of sexual abuse and sexual harassment.” Policy (P-100) notes that following an administrative finding that an incarcerated person engaged in incarcerated person-on-incarcerated person sexual abuse, said incarcerated person is subject to disciplinary sanctions pursuant to formal disciplinary processes. Agency policy (P-100) further notes that “reports of sexual abuse, or harassment of one incarcerated person by another incarcerated person, or retaliation towards an incarcerated person by another incarcerated person for reporting or cooperating in an investigation of sexual abuse or harassment will be investigated and referred for prosecution when appropriate in accordance with the PREA reporting policy.” Interviews with twelve (12) random staff confirmed staff awareness of these sanctions. During the audit time frame, the Lerdo Justice Facility has not had any (0) administrative findings of incarcerated person-on-incarcerated person sexual abuse.

(B) Agency policy (P-900) ensures sanctions for incarcerated person-on-incarcerated person sexual abuse “shall be commensurate with the nature and circumstances of the abuse committed, the incarcerated person’s disciplinary history, and the sanctions imposed for comparable offenses by other incarcerated people with similar histories.” As well, sanctions consider aggravating and mitigating factors. Interviews with the Lerdo Justice Facility Administrator, Lerdo Justice Facility PCM, and Lerdo Justice Facility Institution Investigator confirm that the Lerdo Justice Facility utilizes a progressive disciplinary structure in the processing of all administrative violations of agency policy.

(C) When determining an incarcerated person’s disciplinary sanctions, agency policy (P-900) requires “the disciplinary process shall consider whether an incarcerated person’s mental disabilities or mental illness contributed to their behavior when determining what type of sanction, if any, should be imposed.” Lerdo Justice Facility disciplinary documentation reflects that the mental disabilities of incarcerated persons are, in fact, given consideration during the disciplinary process. As well, review of disciplinary hearing documentation does reflect the mental state of incarcerated persons is given consideration during the sentencing phase of disciplinary proceedings. Interviews with the Lerdo Justice Facility Administrator, Lerdo Justice Facility PCM, and Lerdo Justice Facility Institution Investigator confirm that the Lerdo Justice Facility utilizes a progressive disciplinary structure in the

processing of all administrative violations of agency policy.

(D) Agency policy (P-900) notes that “as a condition of access to programming or other benefits, KCSO may require the incarcerated person to participate in a program designed to address and correct underlying reasons or motivations for the abuse.” Interviews with Lerdo Justice Facility Medical and Mental Health staff indicate that programming and/or interventions services are provided to incarcerated persons found to have engaged in sexual abuse.

(E) Agency policy (P-900) allows that “the agency may discipline an incarcerated person for sexual contact with staff only upon a finding that the staff member did not consent to such contact.” Interviews with the Lerdo Justice Facility PCM and Lerdo Justice Facility Institution Investigator confirm that the Lerdo Justice Facility does not impose disciplinary sanctions against incarcerated persons who are victims of sexual abuse or sexual harassment.

(F) Per agency policy (P-900), “for the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute false reporting or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.” Rather, as noted by the Lerdo Justice Facility Institution Investigator, a report made in good faith, based on a reasonable belief that the alleged conduct did occur, doesn’t rise to the level of false reporting even if the investigation does not establish sufficient evidence to substantiate the allegations. An interview with an incarcerated person who had previously reported allegations of sexual abuse confirmed Lerdo Justice Facility adherence to agency policy.

(G) Per agency policy (P-900), the agency clearly distinguishes between consensual sex, which is still a violation of KCSO policy, and incarcerated person-on-incarcerated person non-consensual sexual conduct/contact, which is defined as when one or more incarcerated persons engage in sexual conduct, including sexual contact, with another incarcerated person against his or her will or by use of force, threats, intimidation, or other coercive actions. Policy (P-900) states the “KCSO prohibits all sexual activity between incarcerated people and may discipline incarcerated people for such activity. KCSO will not, however, deem such activity to constitute sexual abuse if it determines that the activity was consensual.” Interviews with the Lerdo Justice Facility Administrator, Lerdo Justice Facility PCM, and Lerdo Justice Facility Institution Investigator confirm facility compliance was agency policy.

Reasoning & Findings Statement:



	<p>This standard works to ensure that incarcerated persons are afforded progressive disciplinary sanctions pursuant to administrative or criminal findings of guilt for incarcerated person-on-incarcerated person sexual abuse. KCSO policy does require a progressive disciplinary system, which allows for the consideration of aggravating and mitigating factors. Specifically, a review of the agency's disciplinary policies, as well as Lerdo Justice Facility disciplinary documentation, reflects that the mental health and of an incarcerated person is given serious consideration in sentencing and in the availability of subsequent mental health services. Within the audit time frame, the Lerdo Justice Facility has not processed any (0) administrative or criminal findings of guilt regarding incarcerated person-on-incarcerated person sexual abuse that occurred at the Lerdo Justice Facility. In considering agency policies, facility procedures, staff interviews, and incarcerated person comments, Lerdo Justice Facility is compliant with disciplinary standards as required under this provision.</p>
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<b>115.81</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24</li> <li>• Kern County Sheriff's Office, K-100, Classification General Policy, 7-11-24</li> <li>• Kern County Sheriff's Office, K-300, Classification Criteria, 7-11-24</li> <li>• Kern County Sheriff's Office, K-500, Classification Reviews, 7-11-24</li> <li>• Employee PREA Training PowerPoint Lesson Slides</li> <li>• KCSO Contractor, Volunteer, and KCSO Civilian Staff PREA Training PowerPoint Lesson Slides</li> </ul>

Interviews:

- PREA Compliance Manager
- Intake Staff
- Investigative Staff
- Medical Staff
- Mental Health Staff
- Staff Who Perform Screening for Risk of Victimization and Abusiveness
- Inmates Who Reported Sexual Victimization During Risk Screening

Site Review Observations:

- Observed Medical/Mental Health Departments and Risk Screening Areas.
- Review of Intake, Medical/Mental Health, and Classification PREA Screening Forms.

Standard Subsections:

(A) Agency policy (P-350) requires that upon arrival, all Lerdo Justice Facility incarcerated persons will be screened for sexual abuse risk factors. Per policy (P-350), if the assessment indicates the incarcerated person is at risk or has experienced prior sexual victimization, “ensure that incarcerated people on automated list reporting prior sexual victimization are referred to medical or mental health in a timely manner so that they can receive treatment within 14 days of the intake and screening” In speaking with the Lerdo Justice Facility PCM, it was noted that any staff member, contractor, or volunteer can make such a referral. Per the Lerdo Justice Facility PCM, within the audit time frame, 100% of incarcerated persons received at the Lerdo Justice Facility who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner. Conversations with medical and mental health staff confirmed the institutionalization of this practice. Interviews with incarcerated persons who reported previous sexual victimization at Intake confirmed that they were seen by mental health services within fourteen days of Intake. Lastly, a review of Lerdo Justice Facility mental health referrals verifies that said recommendations are being made within agency policy.

(B) As the Lerdo Justice Facility is not a prison, this provision is not applicable.

(C) Agency policy (P-350) requires that upon arrival, all Lerdo Justice Facility incarcerated persons will be screened for sexual abuse risk factors. Per policy (P-350), if the assessment indicates the incarcerated person is at risk or has experienced prior sexual victimization, “ensure that incarcerated people on automated list reporting prior sexual victimization are referred to medical or mental health in a timely manner so that they can receive treatment within 14 days of the intake and screening” In speaking with the Lerdo Justice Facility PCM, it was noted that any staff member, contractor, or volunteer can make such a referral. Per the Lerdo Justice Facility PCM, within the audit time frame, 100% of incarcerated persons received at the Lerdo Justice Facility who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner. Conversations with medical and mental health staff confirmed the institutionalization of this practice. Interviews with incarcerated persons who reported previous sexual victimization at Intake confirmed that they were seen by mental health services within fourteen days of Intake. Lastly, a review of Lerdo Justice Facility mental health referrals verifies that said recommendations are being made within agency policy.

(D) Per policy (P-200) the “KCSO will implement appropriate controls of dissemination of confidential information through policy, training and the “need to know” legal restriction on accessing electronic incarcerated person records, in order to ensure that responses to questions asked pursuant to this standard and sensitive information is not exploited to the incarcerated person’s detriment by staff or other incarcerated people.” As noted by medical and mental health staff during the interview process, medical and mental health practitioners shall obtain informed consent from incarcerated persons before reporting information about prior sexual victimization that did not occur in an institutional setting.

(E) Per policy (P-350) and in accordance with the Prison Rape Elimination Act (PREA) Standards, 28 C.F.R. §115.81, any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local laws. Per policy (P-550) “unless precluded by federal, state, or local law, Medical and Behavioral Health staff shall inform incarcerated people of their duty to report sexual abuse and the limits of their confidentiality at the initiation of services.” As confirmed by medical and mental health staff during the interview process, medical and mental health practitioners shall obtain informed consent from incarcerated persons before reporting information about prior sexual victimization that did not

	<p>occur in an institutional setting, unless the incarcerated person is under the age of 18 years or considered a vulnerable adult.</p> <p>Reasoning &amp; Findings Statement:</p> <p>Within the audit time frame, 100% of incarcerated persons who had disclosed prior victimization during risk screening were offered a follow-up meeting with a medical or mental health practitioner. Within the audit time frame, 100% of incarcerated persons who had previously perpetrated sexual abuse as indicated during risk screening were offered a follow-up meeting with a medical or mental health practitioner. As noted by medical and mental health staff, the Lerdo Justice Facility is providing routine and regular medical screens and other health services in accordance to qualified medical assessments, as well as to policy. Documentation specific to the PREA risk screening process for medical and mental health staff reflects the appropriate use of the screening tool to determine necessary housing and medical needs. Lastly, per agency policy, all incarcerated persons except individuals with developmental disabilities, are required to be provide informed consent prior to facility staff reporting information about prior sexual victimization that did not occur in an institutional setting. As such, the facility meets all provisions as established within this standard.</p>
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<b>115.82</b>	<b>Access to emergency medical and mental health services</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24</li> <li>• Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24</li> <li>• Kern County Sheriff's Office, K-100, Classification General Policy, 7-11-24</li> <li>• Kern County Sheriff's Office, K-300, Classification Criteria, 7-11-24</li> </ul>

- Kern County Sheriff's Office, K-500, Classification Reviews, 7-11-24
- Employee PREA Training PowerPoint Lesson Slides
- KCSO Contractor, Volunteer, and KCSO Civilian Staff PREA Training PowerPoint Lesson Slides
- Kern County and KCSO Contract with Kern County Forensic Services, LLC, 6-13-23
- KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23
- KCSO Medical and Mental Health Care Providers PREA Training Roster, 6-17-25

Interviews:

- PREA Compliance Manager
- Medical Staff
- Mental Health Staff
- SAFE and/or SANE Personnel of the Local Hospital/Rape Crisis Clinic
- Community-Based Victim Advocacy Staff
- Security Staff and/or Non-Security Staff Who Have Acted As First Responders
- Random Staff

Site Review Observations:

- Observed Medical/Mental Health Departments and Risk Screening Areas.
- Review of Intake, Medical/Mental Health, and Classification PREA Screening Forms.

Standard Subsections:

(A) Agency policy (P-550) states that "the Kern County Sheriff's Office (KCSO) Detentions Bureau has developed a policy on victim services and a victim services response plan to provide incarcerated person victims of sexual harassment, abuse, or

assault with immediate intervention and/or prompt emergency and crisis intervention services from medical, behavioral health, and victim advocates... Provide incarcerated person victims of sexual abuse timely, unimpeded emergency medical treatment, taking care to preserve and/or secure evidence, as possible.” In interviewing medical and mental health staff, said staff confirmed the ability to treat incarcerated persons in accordance with their professional medical judgement. Documentation review supports that when medically appropriate, incarcerated persons alleging sexual abuse and sexual harassment are provided emergency medical treatment.

(B) Policy (P-550) requires “security staff discovering a new sexual assault will:

- radio “assault” only, indicate not in-progress if appropriate;
- lock down unit or relocate incarcerated people to holding cell or recreation yard;
- assist incarcerated person with necessary first aid until medical staff arrive;
- identify and separate any victim(s) from any known or potential suspect(s);
- restrict access to and secure any potential crime scene(s);
- begin completing a KCSO Crime Scene Log;
- identify any possible witnesses;
- ensure all involved incarcerated people are secured both from sight and sound;
- advise victim not to eat, drink, brush teeth, change clothes, or use the toilet in order to preserve potential evidence;
- secure suspect(s) in area without water access for limited amount of time;
- transport victim to infirmary via gurney, wheelchair, or walking, per medical staff;
- leave unit locked down and secured for Investigator / TI;
- write appropriate supplemental MOBILE/LERMS Incident report(s).”

In speaking with twelve (12) random staff, 24-hour availability of qualified medical and mental health practitioners, via facility staff and local hospital staff, was affirmed. Lastly, during interviews with first responders, as well as random security staff, all personnel recognized with immediacy the need to notify medical staff of any sexual abuse allegations.

(C) Policy (P-550) requires that facility staff must “offer incarcerated person victims of

	<p>sexual abuse who do not receive a forensic examination with timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.” Also, policy (P-550) requires that facility staff must “Offer incarcerated person victims of sexual abuse who do not receive a forensic examination with timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.” In speaking with medical staff, adherence to this policy was confirmed. In speaking with SANE/SAFE personnel, it was further noted that all medical precautions, to include appropriate prophylactic information and treatment for sexually transmitted diseases, are given to victims of sexual abuse. An incarcerated person who had previously made allegations of sexual abuse also confirmed the individual had received medical and/or mental health treatment in a timely manner.</p> <p>(D) Policy (P-550) notes that “KCSO shall provide free community level medical and behavioral health services to all sexual abuse victims with or without cooperation in any subsequent investigation.” In speaking with medical staff, adherence to this policy was confirmed. Additionally, an incarcerated person who had previously received medical treatment for allegations of sexual abuse confirmed that there wasn’t a charged or medical fee for said services.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard is designed to provide incarcerated persons access to emergency medical and mental health services. In this, facility staff are meeting all the provisions within this standard. Policy allows that upon receipt of an incarcerated person into the Medical Department, medical staff shall determine the incarcerated person’s course of treatment; specifically, what is medically indicated based on evidence collection or physical trauma. Incarcerated person interviews further acknowledge that incarcerated persons are provided appropriate medical and mental health treatment. Lastly, documentation reflecting access to medical and mental health care, to include outside services, was reviewed. In reviewing the totality of the information provided, the Lerdo Justice Facility has met the minimums provisions of this standard.</p>
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<b>115.83</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>

Documents:

- Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24
- Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24
- Kern County Sheriff's Office, P-300, Employee Training and Incarcerated Person Education, 7-11-24
- Kern County Sheriff's Office, P-350, PREA Intake and Screening, 7-11-24
- Kern County Sheriff's Office, K-100, Classification General Policy, 7-11-24
- Kern County Sheriff's Office, K-300, Classification Criteria, 7-11-24
- Kern County Sheriff's Office, K-500, Classification Reviews, 7-11-24
- Employee PREA Training PowerPoint Lesson Slides
- KCSO Contractor, Volunteer, and KCSO Civilian Staff PREA Training PowerPoint Lesson Slides
- Kern County and KCSO Contract with Kern County Forensic Services, LLC, 6-13-23
- KCSO MOU Kern Behavioral Health and Recovery Services Department, 4-28-23
- KCSO Medical and Mental Health Care Providers PREA Training Roster, 6-17-25
- KCSO Contract with Women's Center High Desert, Inc., 4-22-24
- KCSO Women's Center High Desert, Inc., Service Pamphlet, English, 9-10-18
- KCSO Women's Center High Desert, Inc., Service Pamphlet, Spanish, 9-10-18
- KCSO Victim's Informational Pamphlet, Marsy's Card, English
- KCSO Victim's Informational Pamphlet, Marsy's Card, Spanish
- KCSO Sexual Assault Survivor's Bill of Rights, English, 10/18
- KCSO Sexual Assault Survivor's Bill of Rights, Spanish, 10/18
- KCSO A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents, Second Edition

Interviews:



- PREA Compliance Manager
- Medical Staff
- Mental Health Staff

Site Review Observations:

- Observed Medical/Mental Health Departments and Risk Screening Areas.
- Review of Intake, Medical/Mental Health, and Classification PREA Screening Forms.

Standard Subsections:

(A) Agency policy (P-550) the "KCSO shall provide medical and behavioral health evaluations and, as appropriate, treatment to all incarcerated people who have been victimized and to abusers if known." In speaking with medical and mental health staff, adherence to this policy was confirmed. In speaking with correctional staff, there were no instances where any staff indicated that the medical or mental health departments had ever, or would ever, refuse to provide medical or mental health treatment to any incarcerated person who claimed to have been a victim of sexual abuse. In speaking with incarcerated persons who were receiving mental health treatment services, most confirmed that upon disclosing that they had been victims of sexual abuse, or upon facility transfer, they were automatically placed on the mental health rosters of their assigned facility.

(B) In reviewing a collection of mental health policies, it is evident that the KCSO offers continuing mental health services to incarcerated persons throughout their assignment to the KCSO and even upon their release from the agency. Specifically, policy (P-550) requires that medical and mental health will "provide follow-up services and develop treatment plans; and offer referrals for continued care upon transfer or placement in other facilities or the victim's release from custody." In speaking with medical and mental health staff, adherence to this policy was confirmed. A review of documentation reflects that incarcerated persons are provided medical and mental health services in accordance to policy.

(C) Agency policy (P-550) mandates that “KCSO shall provide free community level medical and behavioral health services to all sexual abuse victims with or without cooperation in any subsequent investigation.” In speaking with medical and mental health staff, adherence to this policy was confirmed. In each instance, as confirmed by medical and mental health staff, related services are provided in accordance with the judgement of qualified health care providers. A review of documentation reflects that incarcerated persons are provided medical and mental health services in accordance to policy.

(D) Within the audit time frame, Lerdo Justice Facility has not had any (0) biological females incarcerated at the facility. Accordingly, pregnancy tests are not medically appropriate.

(E) Within the audit time frame, Lerdo Justice Facility has not had any (0) biological females incarcerated at the facility. Accordingly, pregnancy services are not medically appropriate.

(F) Policy (P-550) requires that facility staff “offer incarcerated person victims of sexual assault tests for sexually transmitted infections, as medically appropriate.” In speaking with medical staff, it was noted that all incarcerated persons are provided medical services as appropriate for the nature of their concerns. In speaking with an incarcerated person who had previously alleged sexual abuse, agency adherence to this policy was confirmed.

(G) Policy (P-550) notes that “KCSO shall provide free community level medical and behavioral health services to all sexual abuse victims with or without cooperation in any subsequent investigation.” In speaking with medical staff, as well as the SAFE/ SANE personnel of the local medical center, adherence to this policy was confirmed. Additionally, a Lerdo Justice Facility incarcerated person who had previously received medical treatment for allegations of sexual abuse also confirmed that there wasn’t a charge or medical fee for said services.

(A) As the Lerdo Justice Facility is not a prison, this provision is not applicable.

Reasoning & Findings Statement:

This standard is designed to ensure ongoing medical and mental health care for sexual abuse victims and abusers. The Lerdo Justice Facility offers qualified and

	<p>coordinated medical and mental health care regardless of an incarcerated person's ability to pay for said services. As appropriate, incarcerated persons are provided the opportunity to attend follow-up treatments, for both medical and mental health services. Once established, agency policy requires that access to said treatment follows the incarcerated person throughout the KCSO system and can be coordinated with community care, to include sexual abuse crisis services from a local rape crisis center, upon the incarcerated person's release from the KCSO. The medical and mental health services provided are consistent with the community level of care. Additionally, because this level of care is coordinated to ensure that incarcerated persons receive every aspect of sexual abuse treatment, addressing both medical and mental health needs on a regular and timely basis, without regard to cost, the opportunity for treatment received in this institutional setting far exceeds that of individuals receiving similar treatments within the community. Accordingly, the Lerdo Justice Facility Medical and Mental Health Departments have collectively exceeded the provisions of this standard.</p>
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115.86 Sexual abuse incident reviews	
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-700, PREA Data Collection, Reviews and Audits, 7-11-24</li> <li>• KCSO PREA Incident Review, 7-11-24</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Agency PREA Coordinator</li> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> </ul>

- Incident Review Team Member

Site Review Observations:

- Reviewed Incident Review Team procedures.

Standard Subsections:

(A) Policy (P-700) states “the facility shall conduct an incident review (Attachment – ‘C’) at the conclusion of every sexual abuse investigation, including allegations not substantiated, unless the allegation has been determined to be unfounded.” During the audit time frame, the Lerdo Justice Facility received four (4) sexual abuse allegations, excluding only unfounded incidents. Accordingly, per the Lerdo Justice Facility PCM, the Lerdo Justice Facility has engaged four (4) incident reviews. In speaking with the Lerdo Justice Facility PCM, the Lerdo Justice Facility Administrator, and the Lerdo Justice Facility Institutional Investigator, each person explained their role within the incident review process. Documentation reviewed support facility compliance with policy.

(B) Policy (P-700) requires that “the incident review shall ordinarily occur within 30 days of the conclusion of the investigation.” During the audit time frame, the Lerdo Justice Facility received four (4) sexual abuse allegations, excluding only unfounded incidents. Accordingly, per the Lerdo Justice Facility PCM, the Lerdo Justice Facility has engaged four (4) incident reviews. In speaking with the Lerdo Justice Facility PCM, the Lerdo Justice Facility Administrator, and the Lerdo Justice Facility Institutional Investigator, each person explained their role within the incident review process. Documentation reviewed support facility compliance with policy.

(C) Policy (P-700) requires that “the review team shall include the PREA coordinator, section manager, with input from line supervisors, investigators, and medical or mental health practitioners.” During the audit time frame, the Lerdo Justice Facility received four (4) sexual abuse allegations, excluding only unfounded incidents. Accordingly, per the Lerdo Justice Facility PCM, the Lerdo Justice Facility has engaged four (4) incident reviews. In speaking with the Lerdo Justice Facility PCM, the Lerdo Justice Facility Administrator, and the Lerdo Justice Facility Institutional Investigator, each person explained their role within the incident review process. Documentation reviewed support facility compliance with policy.

(D) Agency policy (P-700) requires that “the review team shall:

- Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
- Consider whether the incident or allegation was motivated by any of the following factors:
  - o Race;
  - o Ethnicity;
  - o Gender identity;
  - o Lesbian, gay, bisexual, transgender or intersex identification;
  - o Status or perceived status;
  - o Gang affiliation;
  - o Other group dynamics at the facility;
- Examine the area in the facility where the incident is reported to have occurred to assess if physical barriers exist in the area which may enable abuse;
- Assess the adequacy of staffing levels in that area during different shifts;
- Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- Prepare and submit a report of its findings, including any recommendations for improvement, to the PREA Compliance Manager and appropriate Section Manager.

During the audit time frame, the Lerdo Justice Facility received four (4) sexual abuse allegations, excluding only unfounded incidents. Accordingly, per the Lerdo Justice Facility PCM, the Lerdo Justice Facility has engaged four (4) incident reviews. In speaking with the Lerdo Justice Facility PCM, the Lerdo Justice Facility Administrator, and the Lerdo Justice Facility Institutional Investigator, each person explained their role within the incident review process. Documentation reviewed support facility compliance with policy.

Agency policy (P-700) requires that upon completion of the incident review report, “the Section Manager shall implement the recommendations for improvement or document their reasons for not doing so.” In speaking with the Lerdo Justice Facility Administrator, the responsibilities of the managing officer to implement incident review recommendations was explained. Documentation reviewed support facility compliance with policy.

	<p>Reasoning &amp; Findings Statement:</p> <p>During the audit time frame, the Lerdo Justice Facility received four (4) sexual abuse allegations, excluding only unfounded incidents. As such, it was necessary to engage an incident review upon the conclusion of each investigation. A review of documentation reflects the timely convergence of designated incident review staff members. In speaking with the Lerdo Justice Facility PCM, the Lerdo Justice Facility Administrator, and the Lerdo Justice Facility Institutional Investigator, each person explained their role within the incident review process. As such, it is evident that the facility has procedures in place to engage incident reviews and that staff are knowledge in their obligations to the team. Accordingly, Lerdo Justice Facility has satisfied the requirements of this standard.</p>
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<b>115.87</b>	<b>Data collection</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ul style="list-style-type: none"><li>· Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li><li>· Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li><li>· Kern County Sheriff's Office, P-700, PREA Data Collection, Reviews and Audits, 7-11-24</li><li>· KCSO PREA Final Report, 2024</li><li>· KCSO PREA Incident Review, 7-11-24</li><li>· Lerado Justice Facility Survey of Sexual Victimization, Instructions, 2023</li><li>· Lerado Justice Facility Survey of Sexual Victimization, Substantiated Incident Form, 2023</li><li>· KCSO Lerado Justice Facility Annual PREA Facility Review Report, 2023</li><li>· KCSO Lerado Justice Facility Annual PREA Facility Review Report, 2024</li></ul>

Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager

Site Review Observations:

- Extensive review of agency website/PREA section
- Reviewed PREA Outcome Measures, 2021-2025

Standard Subsections:

(A) Agency policy (P-700) provides all staff within the KCSO a standardized set of definitions specific to sexual abuse/sexual harassment allegations. Policy (P-700) further mandates that “the Kern County Sheriff’s Office (KCSO) Detentions Bureau Compliance Section, in accordance with the Prison Rape Elimination Act (PREA), shall maintain incident data for all reports of sexual abuse, assault, and harassment.” In speaking with the Lerdo Justice Facility PCM, adherence to this provision was confirmed. Documentation review further confirms facility compliance with this provision.

(B) Agency policy (P-700) further requires that “all data shall be aggregated annually, and a report made available to the public on the Sheriff’s Office public website.” In speaking with the Lerdo Justice Facility PCM, adherence to this provision was confirmed. Documentation review further confirms facility compliance with this provision.

(C) Agency policy (P-700) requires that “the data collected shall answer all questions from the most recent Department of Justice Survey of Sexual Violence.” Furthermore, as confirmed by the KCSO PREA Coordinator, the data collected does include all information necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Bureau of Justice Statistics. Documentation review further confirms facility compliance with this provision.

	<p>(D) Agency policy (P-700) requires that facility staff will “maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual assault/abuse incident reviews.” The KCSO PREA Coordinator confirmed the agency’s overall adherence to this policy. As well, the Lerdo Justice Facility PCM confirmed that the above reference sources were continuously used to inform the agency’s annual statistical reports. Documentation review confirms facility compliance with this provision.</p> <p>(E) Agency policy (P-700) mandates that “obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its incarcerated people.” Nonetheless, as noted by the KCSO PREA Coordinator, the Lerdo Justice Facility does not contract for the confinement of its incarcerated persons.</p> <p>(F) Agency policy (P-700) requires that “upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice (DOJ) no later than June 30.” As confirmed by the PREA Coordinator, said data is provided to the DOJ no later than June 30th of each year.</p> <p>Reasoning &amp; Findings Statement:</p> <p>This standard works to ensure that specific data relative to promoting sexual safety within a correctional institution is collected on a monthly basis. That data is then aggregated and made available for public review on an annual basis. The Lerdo Justice Facility has complied with the timely collection of said data and subsequently furnishes it to appropriate entities as required. Hence, the Lerdo Justice Facility has met all provisional requirements and is in compliance with this standard.</p>
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<b>115.88</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>Kern County Sheriff’s Office, P-100, Zero Tolerance of Sexual Abuse and</li> </ul>



Harassment, 7-11-24

- Kern County Sheriff’s Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24
- Kern County Sheriff’s Office, P-700, PREA Data Collection, Reviews and Audits, 7-11-24
- KCSO PREA Final Report, 2024
- KCSO PREA Incident Review, 7-11-24
- Lerado Justice Facility Survey of Sexual Victimization, Instructions, 2023
- Lerado Justice Facility Survey of Sexual Victimization, Substantiated Incident Form, 2023
- KCSO Lerado Justice Facility Annual PREA Facility Review Report, 2023
- KCSO Lerado Justice Facility Annual PREA Facility Review Report, 2024

Interviews:

- Agency PREA Coordinator
- Facility Administrator
- PREA Compliance Manager

Site Review Observations:

- Extensive review of agency website/PREA section
- Reviewed PREA Outcome Measures, 2021-2025

Standard Subsections:

(A) Policy (P-700) requires the that “the Compliance Section shall conduct an annual review of the aggregated, incident-based data collected to assess and improve the effectiveness of all PREA related training, policies, and procedures.” As noted by the KCSO PREA Coordinator, the agency prepares and aggregates data related to sexual

abuse and sexual harassment across all KCSO facilities. Following which, the KCSO then uses that data to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training. Specifically, the KCSO works to identify problem areas, take corrective action on an ongoing basis, and prepares an annual report of its findings from the data review and any corrective actions for each facility, as well as the agency as a whole. The PREA Coordinator confirmed adherence to this policy. As well, the KCSO Annual PREA Facility Review Report 2023 and 2024 does reflect the intelligent use of said data.

(B) Policy (P-700) requires that “the review data will be compiled into a report detailing the findings, which will include:

- Identification of any deficiencies within each facility or section;
- Suggested corrective actions (if any);
- Comparison of the current year's data with the prior year; and
- Assessment of progress in addressing sexual assault/abuse.

The PREA Coordinator confirms adherence to this policy. As well, the KCSO Annual Internal Report on Sexual Assault Data for years 2023 and 2024 does reflect a comparative analysis across years.

(C) Policy (P-700) requires that “the completed report shall be forwarded to the Detentions Bureau Chief Deputy via chain of command for approval. Upon approval, the report will be made readily available to the public via the Sheriff’s Office public website.” The PREA Coordinator confirms adherence to this policy. Furthermore, a review of the KCSO website finds all agency PREA reports publicly available: <https://www.kernsheriff.org/Prea>

(D) Policy (P-700) requires that “specific material that would present a clear and specific threat to the safety and security of a facility will be redacted prior to publication for public viewing. The report must indicate the nature of the material redacted.” In speaking with the agency PREA Coordinator, it was noted that should the agency need to redact specific information other than publicly identifying statistics, proper procedural restraints would be applied. Documentation review confirms facility compliance with this provision.

Reasoning & Findings Statement:

This standard works to determine if agency, and by extension, facility base staff use

	aggregated data to promote the overall safety and security of the facility. In speaking with the agency-wide PREA Coordinator, the Lerdo Justice Facility Administrator, and the Lerdo Justice Facility PCM, the manner in which person utilized the data to improve overall institutional safety, based on their role within the agency, was explained. Hence, the Lerdo Justice Facility has demonstrated clear compliance with each of the provisions, and as such, has reached the goal of the standard.
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<b>115.89</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• Kern County Sheriff's Office, P-700, PREA Data Collection, Reviews and Audits, 7-11-24</li> <li>• KCSO PREA Final Report, 2024</li> <li>• KCSO PREA Incident Review, 7-11-24</li> <li>• Lerado Justice Facility Survey of Sexual Victimization, Instructions, 2023</li> <li>• Lerado Justice Facility Survey of Sexual Victimization, Substantiated Incident Form, 2023</li> <li>• KCSO Lerado Justice Facility Annual PREA Facility Review Report, 2023</li> <li>• KCSO Lerado Justice Facility Annual PREA Facility Review Report, 2024</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>• Agency PREA Coordinator</li> <li>• Facility Administrator</li> <li>• PREA Compliance Manager</li> </ul>

Site Review Observations:

- Extensive review of agency website/PREA section
- Reviewed PREA Outcome Measures, 2021--2025

Standard Subsections:

(A) Policy (P-700) requires that “the Compliance Section shall ensure that data collected is securely retained.” The PREA Coordinator confirms agency compliance with this directive. As well, review of the agency website reflects the collection of all annual aggregated reports previously published pursuant to §115.87.

(B) Policy (P-700) requires the KCSO that “upon approval, the report will be made readily available to the public via the Sheriff’s Office public website.” The PREA Coordinator confirms agency compliance with this directive. As well, review of the agency website reflects the collection of all annual aggregated reports previously published pursuant to §115.87. This data is made readily available to the public through the KCSO website.

(C) Policy (P-700) requires the KCSO to “remove all personal identifiers prior to making all facility aggregated sexual abuse data available to the public annually on its website.” The PREA Coordinator confirms agency compliance with this directive. As well, review of the agency website reflects the collection of all annual aggregated reports previously published pursuant to §115.87. This data is made readily available to the public through the KCSO website.

(D) Policy (P-700) requires the KCSO to “maintain collected sexual assault/abuse data for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise.” The PREA Coordinator confirms agency compliance with this directive. As well, review of the agency website reflects the collection of all annual aggregated reports previously published pursuant to §115.87. This data is made readily available to the public through the KCSO website.

Reasoning & Findings Statement:

	<p>This standard works to ensure both public availability and agency integrity in the presentation of aggregated sexual abuse data. In reviewing agency documents and speaking with staff, it is more than apparent that both the KCSO PREA Coordinator, as well as the administration of the Lerdo Justice Facility, operate with transparency in government. As such, the facility has clearly obtained each provision, and thus, satisfactorily achieve overall compliance.</p>
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115.401	Frequency and scope of audits
	<div>Auditor Overall Determination: Meets Standard</div> <div>Auditor Discussion</div> <div> <p>Documents:</p> <ul style="list-style-type: none"> <li>Kern County Sheriff’s Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>Kern County Sheriff’s Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>KCSO PREA Final Report, 2024</li> <li>Lerado Justice Facility PREA Audit, 2019</li> <li>Lerado Justice Facility Survey of Sexual Victimization, Instructions, 2023</li> <li>Lerado Justice Facility Survey of Sexual Victimization, Substantiated Incident Form, 2023</li> <li>Lerado Justice Facility Audit Notices, English</li> <li>Lerado Justice Facility Audit Notices, Spanish</li> </ul> <p>Interviews:</p> <ul style="list-style-type: none"> <li>Agency PREA Coordinator</li> <li>Facility Administrator</li> <li>PREA Compliance Manager</li> </ul> </div>

- Random/Targeted Staff
- Random/Targeted Inmates

Site Review Observations:

- Onsite inspection of the entire Lerdo Justice Facility
- Review of documentation available via the KCSO PREA website

Standard Subsections:

(A) As evidenced by the presence of facility audits on the KCSO website, PREA Audits have not been completed on all KCSO correctional facilities, to provide for at least one-third of each facility type operated by the KCSO, during each audit year within the past three years. The Lerdo Minimum Security Facility has not been operational since 2018. As such, that facility has not been audited for PREA compliance since 2019. Additionally, the Lerdo Justice Facility has not been audited for PREA compliance since 2019.

(B) This is Audit Year 3 of Cycle 4.

(C) The auditor had full access to all areas of the facility.

(D) All documents requested by the auditor were received in a timely manner.

(E) The auditor was permitted to conduct private interviews with incarcerated persons.

(F) Incarcerated persons were permitted to correspond with the auditor using privileged mail processes.

Reasoning & Findings Statement:

	<p>As evidenced by the presence of facility audits on the KCSO website, PREA Audits have not been completed on all KCSO correctional facilities, to provide for at least one-third of each facility type operated by the KCSO, during each audit year within the past three years. The Lerdo Minimum Security Facility has not been operational since 2018. As such, that facility has not been audited for PREA compliance since 2019. Additionally, the Lerdo Justice Facility has not been audited for PREA compliance since 2019. Nonetheless, in correcting for that lapse of PREA Audits, the KCSO is currently updating compliance with the current Lerdo Justice Facility PREA Audit. Both the PREA Coordinator and the Lerdo Justice Facility PCM were exceptionally prepared for the current review. The auditor was provided the PAQ well in advance of arriving to the facility. The auditor was given unrestricted access to the institution and provided with all reference materials requested. The auditor was provided with a convenient location from which to interview both employees and staff in a confidential manner. Agency staff ensured that the flow of interview traffic was never restricted and that the auditor was able to attend all requested incarcerated person functions throughout the facility as needed. The auditor did not experience any significant barriers, at any stage of the audit, that were under the control of either the agency or the Lerdo Justice Facility. Accordingly, Lerdo Justice Facility has now met the requirements of this standard.</p>
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<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ul style="list-style-type: none"> <li>• Kern County Sheriff's Office, P-100, Zero Tolerance of Sexual Abuse and Harassment, 7-11-24</li> <li>• Kern County Sheriff's Office, P-200, Prevention and Detection of Sexual Abuse, 7-11-24</li> <li>• KCSO PREA Final Report, 2024</li> <li>• Lerado Justice Facility PREA Audit, 2019</li> <li>• Lerado Justice Facility Survey of Sexual Victimization, Instructions, 2023</li> <li>• Lerado Justice Facility Survey of Sexual Victimization, Substantiated Incident Form, 2023</li> <li>• Lerado Justice Facility Audit Notices, English</li> </ul>

- Lerado Justice Facility Audit Notices, Spanish

Interviews:

- Agency PREA Coordinator

Site Review Observations:

- Onsite inspection of the entire Lerdo Justice Facility
- Review of documentation available via the KCSO PREA website

Standard Subsections:

(F.)Agency policy (P-700) mandates that all KCSO PREA Audits “will be made readily available to the public via the Sheriff’s Office public website.” The PREA Coordinator affirms that all completed audit reports for facilities within the KCSO, which have been audited, have been subsequently published on the agency’s website. A review of the agency website reflects that the KCSO has published all final audit reports completed during the last three years preceding this audit.

Reasoning & Findings Statement:

The function of this standard is to promote transparency in government by ensuring that all facility audits are available for public review, by way of, for example, the agency’s website. In this case, the KCSO does have an agency website and has published all completed PREA Audit reports conveniently accessible to the public.



<b>Appendix: Provision Findings</b>		
<b>115.11 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.11 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.11 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
<b>115.12 (a)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	yes
<b>115.12 (b)</b>	<b>Contracting with other entities for the confinement of inmates</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	na

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

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

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

	facility does not have female inmates.)	
<b>115.15 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	na
<b>115.15 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
<b>115.15 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.15 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
<b>115.43 (a)</b>	<b>Protective Custody</b>	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
<b>115.43 (b)</b>	<b>Protective Custody</b>	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
<b>115.43 (c)</b>	<b>Protective Custody</b>	

	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
<b>115.43 (d) Protective Custody</b>		
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
<b>115.43 (e) Protective Custody</b>		
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a) Inmate reporting</b>		
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.51 (b) Inmate reporting</b>		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	yes

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

	<b>victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.83 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
<b>115.83 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	na
<b>115.83 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.83 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.83 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	na

<b>115.86 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.86 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.86 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.86 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes



<b>115.87 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.87 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.87 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
<b>115.87 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

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

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

(f)	
	<div data-bbox="320 185 1273 555"> <p>The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)</p> </div> <div data-bbox="1302 185 1353 219">yes</div>