

PREA Facility Audit Report: Final

Name of Facility: Missoula County Detention Facility

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 07/13/2026

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: Karen d. Murray

Date of Signature: 07/13/2026

AUDITOR INFORMATION

Auditor name: Murray, Karen

Email: kdmconsults1@gmail.com

Start Date of On-Site Audit: 06/22/2026

End Date of On-Site Audit: 06/23/2026

FACILITY INFORMATION

Facility name: Missoula County Detention Facility

Facility physical address: 2340 Mullan Road, Missoula, Montana - 59808

Facility mailing address:

Primary Contact

Name:	April Ramert
Email Address:	aramert@missoulacounty.us
Telephone Number:	4062584016

Warden/Jail Administrator/Sheriff/Director	
Name:	Commander Sheryl Ziegler
Email Address:	sziegler@missoulacounty.us
Telephone Number:	4062584047

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

Facility Health Service Administrator On-site	
Name:	Deb Weatherwax
Email Address:	dweatherwax@missoulacounty.us
Telephone Number:	(406) 258-4063

Facility Characteristics	
Designed facility capacity:	368
Current population of facility:	311
Average daily population for the past 12 months:	287
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both women/girls and men/boys

Age range of population:	18-no limit
Facility security levels/inmate custody levels:	minimum to maximum
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	120
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	28
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	94

AGENCY INFORMATION

Name of agency:	Missoula County Sheriff's Department
Governing authority or parent agency (if applicable):	
Physical Address:	2340 Mullan Road, Missoula, Montana - 59808
Mailing Address:	2340 Mullan Road, Missoula, - 59808
Telephone number:	4062584000

Agency Chief Executive Officer Information:

Name:	Sheriff Jeremiah Petersen
Email Address:	jpetersen@missoulacounty.us
Telephone Number:	1-406-258-3303

Agency-Wide PREA Coordinator Information

Name:	April Ramert	Email Address:	aramert@missoulacounty.us
--------------	--------------	-----------------------	---------------------------

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:

7

- 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
- 115.17 - Hiring and promotion decisions
- 115.31 - Employee training
- 115.35 - Specialized training: Medical and mental health care
- 115.41 - Screening for risk of victimization and abusiveness
- 115.68 - Post-allegation protective custody
- 115.83 - Ongoing medical and mental health care for sexual abuse victims and abusers

Number of standards met:

38

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:	2026-06-22
2. End date of the onsite portion of the audit:	2026-06-23

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?	☒ Yes ☐ No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	YWCA - sexual abuse victim advocates PREA@missoulacounty.us: - Agency third party reporting option

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	392
15. Average daily population for the past 12 months:	280
16. Number of inmate/resident/detainee housing units:	15
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	☐ Yes ☒ No ☐ Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	307
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:	36
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:	12
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:	0
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:	0
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:	12
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:	7

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:	2
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:	1
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:	43
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:	0
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):	No text provided.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
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:	307
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:	2

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:	12
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	13
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	☐ Age ☐ Race ☐ Ethnicity (e.g., Hispanic, Non-Hispanic) ☐ Length of time in the facility ☒ Housing assignment ☒ Gender ☐ Other ☐ None
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	The facility provided inmate rosters by targeted category and housing unit. Once the Auditor randomly selected 13 targeted inmates, an additional 13 random inmates were selected across all housing units to ensure a representative sample of both genders and housing assignments.

43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	☒ Yes ☐ No
44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	12
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".	
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:	1
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:	2

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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ 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. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	After review of inmate rosters and specialized staff interviews, this category of inmate did not appear to be residing at the facility during the onsite review.
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ 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. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	After review of inmate rosters and specialized staff interviews, this category of inmate did not appear to be residing at the facility during the onsite review.

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:	1
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:	4
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:	1
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:	1
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:	4
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:	0

a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	☒ 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. ☐ The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	After review of inmate rosters and specialized staff interviews, this category of inmate did not appear to be residing at the facility during the onsite review.
57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
58. Enter the total number of RANDOM STAFF who were interviewed:	12
59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	☐ Length of tenure in the facility ☒ Shift assignment ☒ Work assignment ☒ Rank (or equivalent) ☐ Other (e.g., gender, race, ethnicity, languages spoken) ☐ None
60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	☒ Yes ☐ No

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):	The facility provided a staff roster by rank, shift, and assignment. Due to staff rotating shifts every three months, 12 staff were randomly selected to ensure a representative sample across ranks, shifts, and assignments.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	13
63. Were you able to interview the Agency Head?	☒ Yes ☐ No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	☒ Yes ☐ No
65. Were you able to interview the PREA Coordinator?	☒ Yes ☐ No
66. Were you able to interview the PREA Compliance Manager?	☐ Yes ☐ No ☒ 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

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

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

71. Did you have access to all areas of the facility?

☒ Yes

☐ No

Was the site review an active, inquiring process that included the following:

72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?

☒ Yes

☐ No

73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?

☒ Yes

☐ No

74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?

☒ Yes

☐ No

75. Informal conversations with staff during the site review (encouraged, not required)?

☒ Yes

☐ No

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).	No text provided.
---	-------------------

Documentation Sampling

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

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?	☒ Yes ☐ No
---	--

78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.
--	-------------------

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	2	0	2	0
Staff-on-inmate sexual abuse	1	0	1	0
Total	3	0	3	0

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	9	0	9	0
Staff-on-inmate sexual harassment	3	0	3	0
Total	12	0	12	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	6	1	2
Staff-on-inmate sexual harassment	0	3	0	0
Total	0	9	1	2

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:

3

86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	3
88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	1
91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	☒ Yes ☐ No ☐ NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	7
94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	7
96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	☐ Yes ☒ No ☐ NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	☒ Yes ☐ No ☐ 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.

No text provided.

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

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

☐ 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

Standards
Auditor Overall Determination Definitions
- Exceeds Standard (Substantially exceeds requirement of standard) - Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) - Does Not Meet Standard (requires corrective actions)
Auditor Discussion Instructions
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.

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: - Missoula County Detention Facility PAQ - Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 - Missoula County Detention Facility Organization Chart, not dated - Missoula County Detention Facility Administration Chain of Command, not dated Interviews: - Random Inmates - Targeted Inmates

3. Detention Officers
4. Sergeants
5. PREA Coordinator
6. Jail Commander
7. Under Sheriff

Interviews with inmates consistently demonstrated confidence in the facility's commitment to maintaining a safe environment free from sexual abuse and sexual harassment. Twenty-four of the twenty-six inmates interviewed stated searches are conducted respectfully by staff, while the two inmates who expressed concerns were unable to articulate sustainable reasons for their dissatisfaction with the search process. All inmates interviewed stated they feel sexually safe within the facility and reported they would seek assistance from Correctional Officers if needed, with one inmate stating, "I know the CO's would help me if I needed."

Interviews with staff consistently demonstrated a culture of professionalism, accountability, and shared responsibility for preventing sexual abuse and sexual harassment. Staff articulated clear expectations regarding professional boundaries, confidentiality, and mandatory reporting, emphasizing that information related to sexual abuse is shared only with those who have a legitimate need to know. One staff member stated, "I have a fine line on conversations—no favoritism," while another commented, "Always report—do the right thing at the right time for the right reason." Staff consistently demonstrated a proactive approach to prevention, with comments such as, "If I see something, I say something," "Keep eyes on, ears on before something can grow," and "Shut the behavior down and make sure my presence is known."

Interviews further demonstrated staff hold one another accountable for maintaining a professional environment. Employees stated inappropriate conversations or unprofessional banter between staff are immediately addressed, with one staff member explaining, "We shut it down on each other." Staff also consistently emphasized being approachable and available to inmates, stating, "Let them know they can talk to us if they need us." Investigative staff were described as trauma-informed and empathetic to victims, and staff consistently reported responding immediately to allegations of sexual abuse, ensuring victims receive support regardless of the investigative outcome. One employee summarized the facility's philosophy by stating, "We respond immediately to victims of sexual abuse and rally around them regardless of the outcome of the investigation—we treat them all the same." Staff further demonstrated ongoing attention to vulnerable inmates by monitoring their safety and taking proactive steps to ensure they remain protected.

The interview with the PREA Coordinator demonstrated she utilizes the agency's New World database and a color-coded standards spreadsheet to oversee PREA systems within each department responsible for PREA-related functions. She further demonstrated she reviews a daily victim/aggressor report to ensure appropriate housing assignments are maintained utilizing Housing Flow Charts posted in each Unit Control Room. Additionally, she stated supervisory staff and Unit Managers are immediately notified by email whenever a housing unit room change occurs to ensure all appropriate personnel are aware of the change.

Site Observation

During the tour of the facility, the Auditor observed laminated PREA Zero-Tolerance postings with internal and external reporting information for inmates, to include advocate telephone number and address information, throughout the facility. PREA Audit Notices were also observed in both English and Spanish in multiple areas throughout the facility.

(a) Missoula County Detention Facility PAQ states the agency policy mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract.

Missoula County Detention Center PREA Policy and Procedure – Adult Facility, page 3, section Policy, states, “The Missoula County Detention Facility has a zero-tolerance policy against all forms of sexual abuse and sexual harassment. MCDF prohibits all sexual activity between or with any inmate(s) under our care and supervision. No staff may work at the facility before completing PREA training. Personnel are exempt from completing prior PREA training when responding to an emergency.”

(b) Missoula County Detention Facility PAQ states the agency employs or designates an upper-level, agency-wide PREA Coordinator. The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities. The position of the PREA Coordinator in the agency's organizational structure.

Missoula County Detention Center PREA Policy and Procedure – Adult Facility, page 5, section

PREA Standard 115.13- Supervision and Monitoring, first two paragraphs state, “MCDF will protect inmates against sexual abuse and sexual harassment by limiting the possibility that inmates and staff will be left alone and unmonitored through

	adequate and ongoing supervision. MCDF will ensure that the facility shall develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and where applicable, video monitoring, to protect inmates against sexual abuse. The PREA Coordinator, along with the Facility Administration, will conduct an annual assessment to determine if staffing patterns, video monitoring systems, other technologies and resources are adequate to ensure the protection of inmates against sexual abuse and sexual harassment by limiting the possibility that inmates and staff will be left alone and unmonitored through adequate and ongoing supervision. The facility provided a Missoula County Detention Facility Organization Chart. The organizational chart demonstrates the PREA Coordinator reports directly to the Administrative Commander who reports directly to the Undersheriff. (c) Missoula County Detention Facility PAQ states this provision is not applicable as this is a standalone facility. Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews consistently demonstrated a culture where the agency's zero-tolerance philosophy has become part of the facility's daily operations rather than simply a written policy. Inmates uniformly reported feeling sexually safe within the facility, expressed confidence that staff would respond appropriately to allegations, and demonstrated awareness of available reporting options. One inmate stated, "Not even here one hour and they taught me about PREA," while another stated he can access the PREA application on the facility tablet. Staff consistently articulated expectations regarding professionalism, accountability, confidentiality, and mandatory reporting, with comments such as, "Always report—do the right thing at the right time for the right reason," and "If I see something, I say something." Throughout the facility, the Auditor observed standardized PREA Zero-Tolerance postings, PREA Audit Notices in both English and Spanish, and internal and external reporting information, including advocate contact information, reinforcing the facility's commitment to ensuring inmates have continuous access to PREA education and reporting resources. Documentation, organizational structure, interviews, and observations collectively demonstrated leadership has provided the PREA Coordinator sufficient authority, visibility, and organizational support to effectively implement, oversee, and sustain the agency's PREA program.
--	--

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated the agency does not contract with other agencies or facilities for the confinement of its inmates. (a) The Missoula County Detention Facility PAQ states the agency has not entered into or renewed a contract for the confinement of inmates Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Staffing Plan, dated 12.2025 4. Staff Deviation Report, dated 5.1.2025 – 5.31.2025 5. Missoula County Sheriff’s Department Detention Shift Time Record, dated 1.2026 6. Missoula County Detention Facility Officer Activity Log (Unannounced Rounds), dated 12.22.2025 – 1.18.2026 Interviews:

1. Sergeant

2. Jail Commander

The interview with the Sergeant demonstrated unannounced rounds are completed at least once per shift per day. He stated rounds are never announced and, if staff alert others that supervisory rounds are being conducted, he returns later that shift to complete another round. The Sergeant further demonstrated rounds include observing staff interactions with inmates, ensuring policy violations are not occurring, speaking with inmates, assessing inmate demeanor, ensuring no sexual behaviors are occurring, completing a camera tour, and documenting each round within the Officer Activity section of the New World database. The Sergeant emphasized the importance of remaining engaged with inmates during rounds by stating, "Keep eyes on, ears on before something can grow."

The interview with the Jail Commander demonstrated Missoula County completed a staffing analysis through a third-party reviewer and subsequently added full-time positions to improve staffing coverage. She further demonstrated annual schedules are developed to account for planned leave and established staffing ratios are maintained to address unplanned absences. Additionally, the staffing plan is reviewed quarterly, with evaluations of camera coverage, audio testing, and overall staffing practices to ensure continued compliance.

Site Observations:

Review of the New World database demonstrated unannounced rounds are documented at least once per shift per day throughout all areas of the facility.

(a) The Missoula County Detention Facility PAQ states the agency requires the facility to develop, document and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against abuse. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of inmates was 287. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of inmates on which the staffing plan was predicated 370.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 5-6, section 115.13 Supervision and Monitoring, Policy, third paragraph states, "MCDF will maintain a staffing plan that provides for adequate levels of staffing to ensure for the protection of each inmate against sexual abuse and sexual harassment. When with an inmate, staff is to remain in an area that can be observed by another staff member directly or through video monitoring system. In situations where additional

staffing is needed, the Supervisor will be notified, and additional staff will be made available.

When MCDF is calculating the appropriate staffing levels and determining the need for video monitoring, the following items shall be taken into consideration:

1. Generally accepted detention and correctional practices;
2. Any judicial findings of inadequacy;
3. Any findings of inadequacy from Federal investigative agencies;
4. Any findings of inadequacy from internal or external oversight bodies;
5. All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated);
6. The composition of the inmate population;
7. The number and placement of supervisory staff;
8. Facility programs occurring on a particular shift;
9. Any applicable State or local laws, regulations, or standards;
10. The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
11. Any other relevant factors."

The facility provided a Missoula County Detention Facility Staffing Plan. The plan documents the following, annually.

- Adult Detention
 - o Shifts Staffing
 - o Transport
 - o Dayshift Staff
- Juvenile Detention
 - o Shift Staffing
- Facility Administration
- Deviation from the Staffing Plan
- Inmate Programming
- Facility Overview

- Programming

- o Adult

- o Juvenile

(b) The Missoula County Detention Facility PAQ states each time the staffing plan is not complied with, the facility does document and or justifies deviations. Common reasons for deviating from the staffing plan in the last 12 months consist of sick leave, vacation, family medical leave, personal leave, comp time, holiday. The PAQ states, "Staff Deviations are compiled for each month, for all shifts. Shift time records included as well."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 6, section 115.13 Supervision and Monitoring, section (b), states, "In circumstances where the staffing plan is not complied with, MCDF will document and justify all deviates from the plan."

The facility provided a staff deviation report from January 2026 demonstrating deviations are documented through this format.

The facility provided documented staffing plan deviations on the Missoula County Sheriff's Department Detention Shift Time Record. The form documents the following information.

- Date / Shift / Days

- Primary Post / Badge # / Name / Shift Time-Begin and End / Hours Worked / Employee Signature

- Badge # / Approved Absence Name / Paid Absence / Non-Paid Absence / Absence Code

- Staff Deviation Report

(c) The Missoula County Detention Facility PAQ states at least once every year the facility/agency, in collaboration with the PREA coordinator, does review the staffing plan to whether adjustments are needed in (a) the staffing, (b) the deployment of monitoring technology, or (c) the allocation of agency/facility resources to commit to the staffing plan to ensure compliance with the staffing plan. This is the first year of PREA Compliance for this facility.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 6, section 115.13 Supervision and Monitoring, section (c), states, “Whenever necessary, but not less frequently than once each year, in consultation with the PREA Coordinator required by 115.11, MCDF will assess, determine, and document whether adjustments are needed to:

1. The staffing plan established.
2. The facility’s deployment of video monitoring systems and other monitoring technologies;
3. The resources the facility has available to commit to ensure adherence to the staffing plan.

The facility provided an Annual Review of Staffing Assignment and Video Monitoring. The staffing plan includes the following information.

1. Generally accepted adult correctional practices
 - a. Montana Jail Standards
 - b. Youth Administrative Rules of Montana
2. Any judicial findings of inadequacy
3. Any findings of inadequacy from federal investigative bodies
4. Any findings of inadequacy from internal or external oversight bodies (i.e.- Continuous Quality Improvement (CQI) process, Quality Assurance (QA) audits.
5. All components of the program’s physical plant (including “blind spots” or areas where staff or residents may be isolated): (A map of the facilities 260 cameras and an attached listing was provided.)
 - a. Camera updates for years 2019 – 2025.
6. The composition of the resident population (i.e.-gender ratios, risk/need of residents, physical size, Sexual Aggressive Behavior (SAB), Vulnerability to Victimization (VV).
7. The number and placement of supervisory staff
 - a. Adult Detention
 - i. Shift Staffing
 - ii. Transport

	iii. Dayshift Staff iv. Unit Managers b. Juvenile Detention i. Shift Staffing c. Facility Administration d. Deviation from the Staffing Plan 8. Programs occurring on a particular shift a. Adult b. Juvenile 9. Any applicable State or local laws, regulations, or standards 10. The prevalence of substantiated and unsubstantiated incidents of sexual abuse 11. Any other relevant factors a. Adult Facility Housing Assignments i. Unit 1 – Restricted Pods - Pods A-G ii. Unit 2 – Pods 2A – 2F iii. Unit 3 – Restrictive Housing – Pods A-F (d) The Missoula County Detention Facility PAQ states facility requires that intermediate level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 6-7, section 115.13 Supervision and Monitoring, section (d), states, “MCDF has implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Such policy and practice shall be implemented for night shifts as well as day shifts. MCDF will have a policy to prohibit staff from alerting other staff members that these supervisory rounds are occurring unless such announcement is related to the legitimate operational functions of the facility. 1. Unannounced rounds will be conducted by a supervisor (or designee) at least once per week per shift. 2. All rounds will be random and unannounced.
--	---

	3. Unannounced rounds will be completed on all shifts. 4. Unannounced rounds shall be completed in each housing unit and program/ common areas. 5. Staff are prohibited from alerting other staff members that the supervisory rounds are occurring, unless such an announcement is related to the legitimate operational functions of the facility. 6. Documentation of these rounds will be maintained in the JMS Correction Officer log. 7. Documentation/findings of these rounds will be sent quarterly to the PREA Coordinator.” The facility provided Missoula County Detention Facility Officer Activity Log (Unannounced Rounds) for rounds supervisor unannounced rounds from 10.22.2025 through 1.18.2026. The logs document the following: · Date/Time · Activity (supervisor unannounced rounds) · Pod/Block · Officer ID · Entered Time · Entry User · Remarks Unannounced rounds demonstrate rounds are documented several times per day, per shift, throughout the entire facility. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Missoula County Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023

Interviews:

1. Jail Commander

Interviews with the Jail Commander demonstrated the facility does not house youthful offenders.

(a-c) The Missoula County Detention Facility PAQ states the facility prohibits placing youthful inmates in a housing unit in which a youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters. The facility does not house youthful inmates.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 7, section 115.14 Youthful inmates, juveniles, and youthful detainees, a-b., states, “To protect youth who are under the age of 18 (“youthful inmates”) and living in adult correctional facilities from sexual abuse or sexual harassment they might experience from adults by:

- (a) Prohibits agencies from placing youthful inmates in housing units where they may have sight, sound, and physical contact with adult inmates
- (b) Limiting opportunities for youthful inmates to interact with adult inmates in unmonitored ways by requiring agencies to keep young people and adults “sight and sound” separated outside of housing areas or employer direct staff supervision in instances where youthful and adult inmates are co-mingles.

Additionally, the standard places restrictions on agencies from defaulting to the use of segregation units to protect youthful inmates from sexual abuse and sexual harassment, so that youthful inmates are not punished for their vulnerability.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 7, section 115.14 Youthful inmates, juveniles, and youthful detainees, Procedure, states, “The MCDF will not place inmates in housing units where they may have sight, sound, and physical contact with adult inmates. Youthful inmates will not interact with adult inmates and will have separate housing areas. Youthful inmates will not co-mingle with adult inmates. MCDF is a co-located facility, and any shared areas (such as

	vehicle sallyport and medical), utilize time-phasing so that adult and juvenile offenders are never in those spaces at the same time. “ Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Log of Cross-Gender viewing Exigent Circumstances, dated 8.31.2022 Interviews: 1. Random Inmates 2. Targeted Inmates 3. Detention Officers 4. PREA Coordinator Interviews with 24 of the 26 inmates demonstrated searches are conducted respectfully by staff, and the transgender female inmate stated she is only searched by female staff. All inmates formally interviewed further demonstrated staff announce when opposite-gender staff enter the housing units. Interviews with Detention Officers demonstrated staff conduct same-sex searches unless a transgender, intersex, or gender non-conforming inmate requests to be searched by a staff member of a different gender. Staff further demonstrated pat searches are conducted under camera coverage and any cross-gender searches are documented.

Site Observations:

During the tour, the search area in the Booking Department was observed within a holding cell that was out of camera view and out of the line of sight of individuals passing through the area. The Booking Department also contained four holding cells equipped with toilets positioned behind half walls and/or windows with black film applied to the lower portion of the windows to provide privacy while toileting. Cameras within the holding cells were observed to be pixelated to further protect inmate privacy.

During the tour, housing units were observed to have wet cells providing privacy while toileting. Inmate showers were equipped with one-quarter doors, limiting visibility to inmates' shoulders and below the ankles, thereby providing privacy while showering and changing.

During the tour, a classroom that had been converted into an office contained bookshelves that created a blind spot when viewing into the room. A recommendation was made to relocate the bookshelves to eliminate the blind spot and improve staff visibility into the office.

(a) The Missoula County Detention Facility PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their inmates. In the past 12 months the facility has conducted zero cross-gender strip or cross-gender visual body cavity searches of inmates.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 7-8, section Policy, states, “MCDF prohibits cross-gender strip, except in exigent circumstances. If required, the cross-gender strip search will be conducted by a trained staff member with a same gender witness in the room.

MCDF prohibits staff of the opposite gender to view inmates showering, changing clothes, or performing bodily functions except when such view is incidental during routine cell (bed) checks.

MCDF shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmates’ genital status. If an inmate’s genital status is unknown, it may be determined during conversation with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

MCDF will train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.”

(b) Missoula County Detention Facility PAQ states the facility does not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. The number of pat-down searches of female inmates that were conducted by male staff has been zero. The number of pat-down searches of female inmates conducted by male staff that did not involve exigent circumstance(s) has been zero. Policy compliance can be found in provision (a) of this standard.

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 8, section Procedure, first paragraph states, “If required in exigent circumstances, when a cross-gender strip search is conducted, it will be done by a trained staff member, with a same gender witness. It will be conducted in a private setting and documented in the shared drive (S:)/Detention/PREA/Forms. MCDF will not conduct visual body cavity searches. If a warrant is obtained for the search, it will be completed by a trained professional. “

The facility provided a Missoula County Detention Facility Log of Cross-Gender viewing Exigent Circumstances. The log documents the following:

1. Date/Time
2. Inmate Name
3. Unit
4. Staff Name
5. Detail of Exigent Circumstance

(d) Missoula County Detention Facility PAQ states the facility has implemented policies and procedures that enable Inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their

	breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policy compliance can be found in provision (a) of this standard. (e) The Missoula County Detention Facility PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex Inmate for the sole purpose of determining the inmate's genital status. Such searches did not occur in the past 12 months. Policy compliance can be found in provision (a) of this standard. (f) The Missoula County Detention Facility PAQ states 100% of security staff receive training on conducting cross-gender pat-down searches and searches of transgender and intersex Inmates in a professional and respectful manner. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 8, section Procedure, paragraphs 1-4, state, “If required in exigent circumstances, when a cross-gender strip search is conducted, it will be done by a trained staff member, with a same gender witness. It will be conducted in a private setting and documented in the shared drive (S:)/Detention/PREA/Forms. MCDF will not conduct visual body cavity searches. If a warrant is obtained for the search, it will be completed by a trained professional. When staff are entering opposite sex housing units, they will announce their presence each time they enter the unit. MCDF will train staff on cross gender pat-down searches and searches of transgender and intersex inmates, in a professional and respectful manner, during the PREA training and document completion. Staff will be required to watch the National PREA Resource Center Video on Guidance in Cross-Gender and Transgender Pat Searches.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Missoula County Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023
3. Language Line Services Agreement, dated 4.18.2022

Interviews:

1. Targeted Inmates
2. Classification Corporal

Interviews with two cognitively delayed inmates and one LEP inmate demonstrated each was aware of the agency's zero-tolerance policy, their rights, and multiple internal and external reporting options, including the hotline, third-party reporting, reporting options available on their tablets, reporting directly to any staff member, submitting kites, and the grievance process.

The interview with the Corporal demonstrated PREA education is provided to every inmate regardless of prior PREA knowledge. He stated staff read each paragraph contained within the PREA pamphlet, complete the education at a later time if an inmate appears intoxicated, repeat the information as many times as necessary to ensure understanding, and provide interpreter services for inmates who do not speak English.

(a) The Missoula County Detention Facility PAQ states the agency has established procedures to provide disabled Inmates equal opportunities to be provided with and learn about the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 8-9, section 115.16, section Policy (a)-(c), state, "MCDF will take appropriate steps to ensure that inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the program's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

(a) When necessary to ensure effective communication with inmates who are deaf or hard of hearing, the program will provide access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, MCDF will ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision.

Note: A program is not required to take actions that can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans with Disabilities Act, 28 CFR 35.164.

The facility provided a Language Line Services Agreement. The agreement appears to be current with no apparent expiration date.

(b) MCDF will take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

(c) MCDF will not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under § 115.64, or the investigation of the inmate's allegations.

(b) The Missoula County Detention Facility PAQ states the agency has established procedures to provide inmates with limited English equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Policy compliance can be found in provision (a) of this standard.

(c) The Missoula County Detention Facility PAQ states the agency prohibits the use of inmate interpreters. In the last 12 months the facility has had zero instances where inmates were used for interpreters.

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 9, section Procedure, states, “MCDF will ensure that inmates with disabilities and inmates who are limited English proficient have equal access to all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment. MCDF contracts with Language Line Solutions for translation services to inmates who are not English proficient and for American Sign Language Translation. The inmate education video, PREA: What You Need to Know will have closed captioning options for deaf inmates. MCDF will not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate’s safety, the performance of first-responder duties, or the investigation of the inmate’s allegations. MCDF will evaluate and document disabilities on intake via the Officer Observation questionnaire. When a disability is identified staff will notify the Unit Manager and/or the PREA Compliance Coordinator to ensure the correct accommodation for education of inmate’s rights to be free from sexual abuse and/or sexual harassment are communicated in an appropriate manner. The Unit Manager will document efforts to include the inmate’s needs and what accommodations were provided regarding inmate PREA education.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Exceeds Standard Auditor Discussion Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility,

dated 4.2023

Interviews:

1. Jail Commander

Interviews with the Jail Commander demonstrated child abuse registry checks are completed upon hire and criminal background checks, and administrative adjudication questions are completed during the pre-employment background investigation process, during promotions, and again every three years during the first year of each audit cycle. She further demonstrated the agency has an affirmative duty process in place, and both the agency conducts and responds to institutional reference checks for applicable current and former employees.

Site Observations:

Through utilization of the PREA Audit – Adult Facilities Documentation Review Employee File / Records Review template, review of 18 employee files demonstrated criminal background checks and child registry checks were completed upon hire and again in 2026. Documentation further demonstrated administrative adjudication questions were completed during both the hiring and promotion processes, and institutional reference checks were completed for all applicable applicants.

(a) The Missoula County Detention Facility PAQ states the agency policy prohibits hiring or promoting anyone who may have contact with inmates, and prohibits enlisting the services of any contractor who may have contact with inmates who has engaged in or been convicted in or administratively adjudicated in sexual activity described in paragraph (a)(2) of this standard.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 9, section Policy (a) 1-3, states, “Prevent staff sexual misconduct by ensuring that individuals who have a prior history of being sexually abusive are not hired or contracted into positions where they may have contact with inmates.

(a) MCDF will not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who—

1. Has engaged in sexual abuse in a prison, jail, lockup, community confinement

facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997);

2. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or

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

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 9, section Policy (b), states, “MCDF will consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.”

(c) The Missoula County Detention Facility PAQ states agency policy requires background checks are conducted with all new hires who have contact with inmates and makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. In the past 12 months 17 persons hired may have contact with an inmate who have had criminal background checks.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 10, section Policy (c) 1-2, states, “Before hiring new employees, who may have contact with inmates, the MCDF will:

1. Perform a criminal background record check;

2. Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.”

(d) The Missoula County Detention Facility PAQ states the agency policy requires that a criminal background records check be completed before enlisting the services of any contractor who may have contact with inmates. In the past 12 months there were 166 contracts for services where criminal background record checks were

conducted on all contractors covered in the contract who might have contact with inmates. The PAQ states, "We don't have any new contracts, but will have run all active staff on our medical contract/teacher lists as well."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 10, section Policy (d), states, "MCDF will also perform a criminal background records check, before enlisting the services of any contractor who may have contact with inmates."

(e) The Missoula County Detention Facility PAQ states the agency requires background checks to be completed every five years.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 10, section Policy (e), states, "MCDF will either conduct criminal background records check at least every five years of current employees and contractors who may have contact with inmate or have in place a system for otherwise capturing such information for current employees."

(f) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 10, section Policy (f), states, "MCDF will also ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. The MCDF will also impose upon employees a continuing affirmative duty to disclose any such misconduct."

(g) The Missoula County Detention Facility PAQ states that agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 10, section Policy (g), states, "Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination."

(h) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 10, section Policy (h), states, "Unless prohibited by law, MCDF will provide information on substantiated allegations of sexual abuse or sexual harassment

	involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.” Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility has implemented multiple layers of screening and verification that extend beyond the minimum PREA requirements to ensure individuals with histories of sexual misconduct are not placed in positions involving inmate contact. The Jail Commander demonstrated criminal background checks, child registry checks, administrative adjudication questions, and institutional reference checks are incorporated into the hiring and promotional processes, while an affirmative duty process requires employees to disclose applicable misconduct throughout their employment. Rather than relying solely on the five-year background check interval required by policy, the facility demonstrated criminal background and child registry checks are completed every three years during the first year of each audit cycle. Documentation review of 18 employee files further demonstrated consistent implementation of these practices, including completed criminal background checks, child registry checks, administrative adjudication questions, and institutional reference checks for all applicable applicants. Collectively, interviews, documentation, and file review demonstrated the facility has established a comprehensive and sustainable personnel screening process that strengthens the agency's ability to prevent individuals with disqualifying histories from having contact with inmates.
--	--

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. Jail Commander 2. Under Sheriff The interview with the Jail Commander demonstrated no modifications have been made to the facility since the previous PREA audit; however, the agency has allocated

	funding for camera replacements and recently purchased a new server to support the camera system. The interview with the Undersheriff demonstrated the Missoula County Sheriff's Office is involved early in the planning of any substantial modifications to the facility. He further stated the Jail Commander meets with facilities and maintenance staff to develop plans that address the safety and security needs of the facility. The Undersheriff also stated the agency continually looks for opportunities to expand video monitoring to enhance security and assist in preventing sexual abuse and sexual harassment. Site Observations: During the tour, cameras were reviewed throughout the facility, including housing units, observation cells, the search area, kitchen areas, classrooms, and hallways. Cameras appeared to be functioning properly, and privacy features were observed within observation cells and the search cell, where toileting areas were pixelated to ensure inmate privacy while in a state of undress. (a) The Missoula County Detention Facility PAQ states the facility has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit. (b) The Missoula County Detention Facility PAQ states the facility has installed cameras in the last 12 months. The PAQ states, "As outlined in our Annual Review of Staffing document, we added audio/video monitoring to unit 2B in all 8 cells." Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: Missoula County Detention Facility PAQ

2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023
3. Memorandum of Understanding between The Missoula County Detention Facility and First Step Resource Center at Providence St. Patrick Hospital, dated 8.19.2025
4. Memorandum of Understanding between Missoula County Detention Center and the YWCA, dated 8.19.2025

Interviews:

1. Mental Health Coordinator – Contractor
2. Detective Lieutenant / Investigator

Interviews with medical and mental health practitioners demonstrated victims of sexual abuse requiring a forensic medical examination are transported to Third Way for services.

The interview with the Investigator demonstrated he and his team conduct all administrative and criminal investigations involving allegations of sexual abuse and sexual harassment involving inmates, as well as adult and juvenile personnel. He further demonstrated investigations are initiated upon notification from the Missoula Police Department, Patrol Division, or the Jail Commander.

Site Observations:

During the past 12 months, the facility reported zero allegations of sexual abuse requiring either a forensic medical examination or an investigative interview.

(a) The Missoula County Detention Facility PAQ states the facility is responsible for conducting Administrative Investigations and the Missoula County Sheriff's Office, an entity of the facility, is responsible for conducting criminal sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct. The PAQ states, "Missoula County Sheriff's Office will be called to conduct criminal investigations of sexual abuse. MCDF is part of the MSCO agency."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 11, section 115.21- Evidence protocol and forensic medical examinations, section Policy (a), states, "The site PREA Compliance Coordinator will establish a written Memorandum of Understanding (MOU) with a medical facility that has Sexual

Assault Forensic Examiners (SAFE) or Sexual Assault Nurse Examiners (SANE) personnel and with a Rape Crisis Center. MCDF programs will refer victims of sexual abuse to an agency that follows evidence protocols for forensic medical examinations.

(a) To the extent MCDF is responsible for investigating allegations of sexual abuse, the program shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.”

(b) The Missoula County Detention Facility PAQ states the protocol being developmentally is appropriate for youth.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 11, section 115.21- Evidence protocol and forensic medical examinations, section Policy (b), states, “The protocol to be used is the “The protocol to be used is the “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/ Adolescents.”

(c) The Missoula County Detention Facility PAQ states the facility offers all inmates who experience sexual abuse access to forensic medical examinations. Forensic examinations are offered at no cost to the victim. Where possible, all examinations are conducted by SAFE or SANE examiners. There has been zero medical exams, SAFE/SANE exams performed in the last 12 months. The PAQ states, “If First Step in not available, inmates will be transported to St. Patrick's Hospital to be examined by a SANE or SAFE.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 11, section 115.21- Evidence protocol and forensic medical examinations, section Policy (c), states, “MCDF will offer all inmates who experience sexual abuse access to forensic medical examinations whether on-site or at an outside program, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners informed on the protocols listed above. The MCDF will document its efforts to provide SAFEs or SANEs medical practitioners and place in the inmate’s medical file.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 11, section 115.21- Evidence protocol and forensic medical examinations, section (c)m states, “MCDF will offer all inmates who experience sexual abuse access to forensic medical examinations whether on-site or at an outside program, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) when possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners informed on the protocols listed above. The MCDF will document its efforts to provide SAFEs or SANEs medical practitioners and place in the inmate’s medical file.”

The facility provided a Memorandum of Understanding between The Missoula County Detention Facility and First Step Resource Center at Providence St. Patrick Hospital. The memorandum appears to be current with no obvious expiration date and is signed by the Jail Commander and the First Step Clinical Supervisor.

(d) The Missoula County Detention Facility PAQ states the facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. All efforts are documented. If a rape crisis center is not available to provide victim advocate services. The facility does employ qualified staff member to accompany victims.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 11, section 115.21- Evidence protocol and forensic medical examinations, section Policy (d), states, “MCDF will attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the program shall make available to provide these services a qualified staff member from a community-based organization or a qualified program staff member. MCDF will document efforts to secure services from rape crisis centers.”

The facility provided a Memorandum of Understanding between Missoula County Detention Center and the YWCA. The MOU appears to be current with no stated expiration date. The MOU is signed by the Missoula County Juvenile Detention Center Jail Commander and the YMCA Director of Programs.

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

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 11, section 115.21- Evidence protocol and forensic medical examinations, section Policy (e), states, “As requested by the victim, the victim advocate, qualified program staff member, or qualified community-based organization staff member 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.” (f, g) The Missoula County Detention Facility PAQ states the agency is responsible for administrative investigations. (h) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 11, section 115.21- Evidence protocol and forensic medical examinations, section, Policy (h), states, “For the purposes of this standard, a qualified staff member or a qualified community- based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. PREA Coordinator 2. Under Sheriff

The interview with the PREA Coordinator demonstrated allegations of sexual harassment and sexual abuse are referred for investigation by the PREA Coordinator, Jail Commander, Assistant Commander, Lieutenant, Captain, or Chief, regardless of the source of the allegation.

The interview with the Undersheriff demonstrated all allegations are reviewed and referred for investigation based on the circumstances reported. Administrative and/or criminal investigations are conducted for all allegations of sexual abuse and sexual harassment. In some instances, a referral is made to the agency with jurisdiction where the alleged incident occurred. If an allegation involves the Missoula County Sheriff's Office, the investigation is referred to an outside law enforcement agency. The Undersheriff stated the agency ensures its partner agencies maintain policies governing the investigation of sexual abuse and sexual harassment allegations. When an allegation involves potential criminal conduct, a Deputy responds and conducts the criminal investigation. If probable cause exists, the case is referred to the County Attorney for prosecution. Allegations determined to be non-criminal in nature are referred to administrative investigators within the Detention Facility to determine whether administrative sanctions, policy revisions, or procedural changes are warranted to enhance inmate safety.

Site Observations:

During the past 12 months, the facility completed 24 administrative investigations. Documentation demonstrated each allegation of sexual harassment or sexual abuse was referred for investigation within five days of receipt.

(a-c) The Missoula County Detention Facility PAQ states the agency insures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had 40 allegations of sexual abuse and sexual harassment that were received. In the past 12 months 24 allegations resulted in an administrative investigation. In the past 12 months zero investigation resulted in a criminal investigation.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 12, section 115.22- Policies to ensure referrals or allegations for investigations, section Policy (a)-(e), states, “MCDF will ensure that an administrative investigation is completed for all allegations of sexual abuse and sexual harassment.

(a) MCDF will ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

	(b) MCDF will have in place a policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations unless the allegation does not involve potentially criminal behavior. MCDF will publish such policy on its website. MCDF will document all referrals. (c) If a separate agency is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity. (d) Any State entity responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons and jails shall have in place a policy governing the conduct of such investigations. (e) Any Department of Justice component responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons or jails shall have in place a policy governing the conduct of such investigations.” The facility has published their investigation policy on their website at http://www-missoulacounty.us/government/public-safety/detention-facility (d) This standard is not applicable as the facility completes Administrative Investigations and the Missoula Sheriff’s Office is responsible for conducting Criminal Investigations. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.31	Employee training
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Employee Training PowerPoint, not dated

4. Missoula County Detention Facility, Training Affidavit Prison Rape Elimination Act Training for MCDF Read and Sign, dated 9.9.2025

Interviews:

1. Detention Officers

Interviews with Detention Officers demonstrated each was aware of and received annual PREA policy review training through either in-person training or signed receipt and verification of policy review during alternating years of annual in-service training. Staff were able to articulate not only the topics covered during annual training, but also the preventive measures each employs during their shift to mitigate sexual harassment and sexual abuse, recognize changes in behavior, and speak privately with inmates to ensure they feel safe. Staff consistently stated, "Keep eyes on, ears on before something can grow," and, "If I see something, I say something," demonstrating the application of PREA principles during daily operations. Staff further demonstrated knowledge of first responder responsibilities, including evidence preservation, maintaining professional boundaries, proper search protocols, internal and external reporting options for inmates, and cross-gender announcements. One staff member summarized the facility's reporting expectations by stating, "Always report—do the right thing at the right time for the right reason."

Site Observations:

Through utilization of the PREA Audit – Adult Prisons & Jails Documentation Review Employee File / Records Review template, review of 18 personnel files demonstrated each employee had received initial and annual refresher PREA training during the past two years.

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 14, section Procedure, states, "MCDF will provide PREA training to all new employees within 6 weeks of hire and prior to any contact with inmates. Employees will be required to provide a signature or electronic verification that staff understand the training they have received. Documentation will be kept in employee files. All MCDF employees will receive an annual refresher training to ensure that staff can prevent, detect, and respond to sexual abuse and sexual harassment and to create a culture of sexual safety in the facility.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 13, section Policy a-j, states, “To ensure that staff can prevent, detect, and respond to sexual abuse and sexual harassment and to create a culture of sexual safety in the facility, all employees who may have contact with inmates shall be trained on:

- a) The zero-tolerance policy for sexual abuse and sexual harassment;
- b) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- c) Inmates’ right to be free from sexual abuse and sexual harassment;
- d) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- e) The dynamics of sexual abuse and sexual harassment in confinement;
- f) The common reactions of sexual abuse and sexual harassment victims;
- g) How to detect and respond to signs of threatened and actual sexual abuse;
- h) How to avoid inappropriate relationships with inmates;
- i) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
- j) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The facility provided the following training Employee PowerPoint presentation with the following learning objectives.

National PREA Resource Center, Unit 1: The Prison Rape Elimination Act: Overview of the Law and Your Role PowerPoint. This curriculum includes the following:

- Unit 1: The Prison Rape Elimination Act: Overview of the Law and Your Role
- Unit 2: Inmates’ Rights to be Free from Sexual Abuse and Sexual Harassment and Staff and Inmate Rights to be Free from Retaliation for Reporting
- Unit 3 Part I: Prevention and Detection
- Unit 3 Part II: Response and Reporting
- Unit 4: Professional Boundaries
- Unit 5: Effective and Professional Communication

National PREA Resource Center, Unit 2: The Prison Rape Elimination Act: Inmates’ Rights to be Free from Sexual Abuse and Sexual Harassment and Staff and Inmates’ Rights to be Free from Retaliation for Reporting PowerPoint. This curriculum includes the following:

- Understand agency policy and PREA requirements related to inmates' right to be free from sexual abuse and sexual harassment
- Understand agency policy and PREA requirements related to staff and inmates' right to be free from retaliation for reporting
- Discuss the role of retaliation in contributing to a code of silence

National PREA Resource Center, Unit 3: The Prison Rape Elimination Act: Prevention and Detection of Sexual Abuse and Sexual Harassment PowerPoint. This training curriculum includes the following:

- Understand the dynamics of sexual abuse and sexual harassment in confinement settings
- Learn how to detect signs of threatened and actual sexual abuse by understanding common reactions of victims of sexual abuse and sexual harassment and common behaviors of abusers
- Apply learning objectives 1 and 2 to fulfill your responsibility under agency sexual abuse and sexual harassment prevention and detection policies and procedures

National PREA Resource Center, Unit 4: The Prison Rape Elimination Act: Professional Boundaries PowerPoint. This training curriculum includes the following:

- Reasons why relationships may occur in confinement settings between staff and inmates
- Identify inappropriate behaviors

National PREA Resource Center, Unit 5: The Prison Rape Elimination Act: Effective and Professional Communication with Inmates PowerPoint. This training curriculum includes the following:

- Define appropriate terminology to use when communicating with the Lesbian, Gay, Bi-Sexual, Transgender and Intersex (LGBTI) population
- Conduct professional communication with inmates, including LGBTI inmates
- Review and understand any relevant agency policy specific to LGBTI inmates

(b) The Missoula County Detention Facility PAQ states training is tailored to the unique needs and attributes and gender of inmates at the facility.

(c) The Missoula County Detention Facility PAQ states between trainings the agency provides employees who may have contact with inmates with refresher information about current policies regarding sexual abuse and sexual harassment. The frequency with which employees who may have contact with inmates receive refresher training on PREA requirements is every two years.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 13, section Policy, second paragraph, states, “MCDF will provide each employee with refresher training annually to ensure that all employees know the agency’s current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, MCDF will provide refresher information on current sexual abuse and sexual harassment policies.”

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 13, section Policy, third paragraph, states, “MCDF will document, through employee signature or electronic verification, that employees understand the training they have received.”

The facility provided a Missoula County Detention Facility, Training Affidavit Prison Rape Elimination Act Training for MCDF Read and Sign receipt and acknowledgment of understanding.

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews with Detention Officers demonstrated PREA training extends beyond annual policy review and is consistently applied throughout daily operations. Staff articulated not only the required training topics but also described the preventive practices they routinely employ to reduce opportunities for sexual abuse and sexual harassment, including recognizing behavioral changes, privately checking on inmates, maintaining professional boundaries, conducting appropriate searches, preserving evidence, and ensuring inmates understand available reporting options. Documentation review of 18 personnel files further demonstrated all staff received initial and annual refresher training, while interviews confirmed the knowledge gained through training is consistently understood, retained, and incorporated into daily practice. Collectively, interviews, documentation, and observations demonstrated PREA principles are reinforced as an ongoing operational expectation rather than solely through annual training requirements.

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Prison Rape Elimination Act Training for Interns, Volunteers, and Contractors, dated 4.8.2025 4. Missoula County Detention Facility PREA Brochure for Interns, Volunteers, and Contractors, not dated Interviews: 1. Mental Health Coordinator - Contractor 2. Health Services Administrator – Contractor 3. Parenting Place – Volunteer 4. Bible Study - Volunteer Interviews with contractors and volunteers demonstrated each received PREA training prior to being granted access to inmates and annually thereafter. Each further demonstrated awareness of the agency's zero-tolerance policy and stated they would immediately report any knowledge, suspicion, or information regarding sexual harassment or sexual abuse to security staff. Site Observations: Through utilization of the PREA Audit – Adult Prisons & Jails Documentation Review Employee File / Records Review template, review of two contractor and two volunteer personnel files demonstrated each had received initial PREA training prior to inmate contact and annual refresher PREA training during the past two years. (a) The Missoula County Detention Facility PAQ states all volunteers and contractors who have contact with Inmates have been trained on their responsibilities under the agency’s policies and procedures regarding sexual abuse and harassment prevention, detection, and response.

The number of volunteers and contractors, who may have contact with inmates, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response is 122.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 14, section 115.32- Volunteer and contractor training, Procedure, states, “MCDF will require all volunteers and contractors complete a “Read and Sign” explaining the facilities zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents. Documentation will be filed on site and volunteer and contractors will receive a copy of the PREA Brochure for Interns, Volunteers, and Contractors to take with them. PREA Compliance Coordinator will be available to answer questions regarding the zero-tolerance policy.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 14, section 115.32- Volunteer and contractor training, Policy (a), states, “All volunteers and contractors who have contact with inmates will be trained on their responsibilities under MCDF’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

(a) The level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates shall be notified of the program’s zero- tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.”

The facility provided a Prison Rape Elimination Act Training for Interns, Volunteers, and Contractors. This curriculum includes the following:

- Mission Statement
- Overview
- Purpose
- What are the primary objectives of the Prison Rape Elimination Act (PREA)?
- What are the procedures for reporting incidents and/or allegations of prison rape?
- Reporting Incidents/Allegations
- Volunteer / Contraction PREA Information
- o Descriptions
- o Sexual Abuse

o Sexual Harassment

o How to Report (including Third Party Reporting form and agency website, facility contact information and PREA Hotline)

· Training Affidavit to include volunteer and or contractor printed name, date, signature and work location.

The facility provided a Missoula County Detention Facility PREA Brochure for Interns, Volunteers, and Contractors. This brochure includes the following:

o Purpose

o What is PREA

o How to Report

o Definitions

o Did you know?

o Mission Statement

(b) The Missoula County Detention Facility PAQ states all volunteers and contractors who have contact with Inmates have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 14, section 115.32- Volunteer and contractor training, Policy (b), states, "MCDF will maintain documentation confirming that volunteers and contractors understand the training they have received."

(c) The Missoula County Detention Facility PAQ states the agency maintains documentation confirming that the volunteers and contractors understand the training they have received. Procedure compliance can be found in provision (a) of this standard.

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.33	Inmate education
	Auditor Overall Determination: Meets Standard Auditor Discussion Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility – Sexual Assault and Staff Misconduct Brochure, not dated 4. Missoula County Detention Facility Acknowledgment of Inmate Education, dated 7.2022 5. PREA What You Need to Know Facilitator Guide, not dated Interviews: 1. Random Inmates 2. Targeted Inmates 3. Classification Corporal Interviews with inmates demonstrated they received education regarding the agency's zero-tolerance policy, their rights, and multiple internal and external reporting options, including reporting to any staff member, contractor, or a trusted adult in the community, through their tablets, kites, the grievance process, or the hotline. Inmates further demonstrated PREA information remains readily available throughout their incarceration through postings within the housing units, kiosks, and inmate tablets. One inmate stated, "Not even here one hour and they taught me about PREA," while another demonstrated the PREA application on the inmate tablet is available. The interview with the Corporal demonstrated all inmates receive education regarding the agency's zero-tolerance policy, reporting procedures, and internal and external reporting options during the intake process. He further demonstrated each inmate is read the PREA educational information, to include reporting options for federal inmates through the U.S. Marshals Service. The Corporal stated inmates are educated regarding their rights, and many could articulate knowledge of the YWCA sexual abuse advocacy services.

Site Observations:

Through utilization of the PREA Audit – Adult Prisons & Jails Documentation Review Inmate File / Records Review template, review demonstrated 19 of the 26 inmates interviewed had been admitted within the past 12 months. Documentation further demonstrated each received initial PREA education during orientation and comprehensive PREA education within 72 hours of intake, with follow-up education again within 21 days of admission.

(a) The Missoula County Detention Facility PAQ states inmates receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. 4432 inmates admitted in the past 12 months were given information at intake.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 5, section Procedure, states, “MCDF will provide inmates the Sexual Assault and Staff Sexual Misconduct brochure at intake which will explain the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. Within 30 days of intake, inmates will be required to watch the PREA: What You Need to Know video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents. During the orientation process, staff will answer questions from inmates and review how to report sexual assault.

MCDF will ensure information is readily available or visible to inmates through posters, brochures, and the inmate handbook. Posters will be visible in each unit and the visiting area. Each inmate will also receive a digital copy of the inmate handbook which will provide reporting information. There will be a Spanish version posted with the English version. The PREA video will be closed captioned and available in Spanish. If an inmate speaks a language other than English or Spanish, staff will utilize the Language Line for translation which will also offer American Sign Language translation as needed. For inmates who have limited reading skills, staff will review the brochure and reporting information 1:1 to ensure the inmate understands the information.”

The facility provided a Missoula County Detention Facility – Missoula County Detention Facility – Sexual Assault and Staff Misconduct Brochure. The brochure provided the following information.

- Sexual assault and staff sexual misconduct are against the law.
- MCDF is committed to your safety and the safety of staff.
- MCDF has ZERO TOLERANCE for sexual assault.

- What is sexual assault
- Examples of sexual assault
- How to prevent sexual assault
- What to do if you've been sexually assault
- PREA Hotline at 1.406.258.3668
- YWCA provides survivors of sexual abuse with emotional support services - to include YWCA address and phone number.
- How to report sexual assault and your options

(b) The Missoula County Detention Facility PAQ states within the past 12 months, 623 inmates received age-appropriate PREA education within 30 days of intake. The PAQ states, "Inmates receive an educational PREA brochure upon intake and have the opportunity to watch the PREA: What you Need to Know video within 30 days of intake. The PREA coordinator goes over ways to report sexual abuse/harassment, how we work with the YWCA, and the key principles about PREA to remember. Inmates are asked if they have any questions."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 14, section Policy (a), states, "MCDF shall provide inmates information on how to prevent sexual abuse and sexual harassment as well as encourage reporting through teaching inmates about their right to be free from sexual abuse and sexual harassment, educating them about the ways they can report it, and making sure they understand what will happen if there is an incident of sexual abuse or sexual harassment, including what services are available to victims. Inmate education can build their trust in staff and the facility's commitment to safety, which may increase reporting and ultimately deter sexual abuse and sexual harassment.

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

The facility provided a PREA What You Need to Know Facilitator Guide demonstrating the following education is provided to inmates.

- Purpose
- Identify disabled and LEP before training begins
- Introduce video

- How to report
- Common Barriers to Reporting Abuse and Sexual Harassment
- MCDF has a Zero Tolerance: Five Key Principles

(c) The Missoula County Detention Facility PAQ states of those who were not educated during 30 days of intake, all inmates have been educated subsequently.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 14, section Policy (b), states, “Within 30 days of intake, MCDF will provide comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.”

(d) The Missoula County Detention Facility PAQ states Inmate PREA education is available in accessible formats for all inmates including those who are limited English proficient, deaf, visually impaired, otherwise disabled or have limited reading skills.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 15, section Policy (c), states, “MCDF will provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills.”

(e) The Missoula County Detention Facility PAQ states the facility maintains documentation of inmate participation in PREA education sessions.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 15, section Policy (d), states, “MCDF will maintain documentation of inmate participation in these education sessions.”

The facility provided a Missoula County Detention Facility Acknowledgment of Inmate Education. This acknowledgment documents the following:

- I have received a copy of the Sexual Assault and Staff Sexual Misconduct brochure.

	· I understand the zero-tolerance policy regarding sexual abuse, sexual misconduct, and sexual harassment. · I received information on how to report directly to MCDF or to the PREA hotline AND how to contact a rape crisis center advocate. · I understand my right to be free of retaliation for reporting. I had the opportunity to ask questions, and any questions were answered to my full understanding. The acknowledgment requires the inmate printed name, signature, date and staff witness name and date. If the inmate refuses to sign a second staff name and date is required. (f) The Missoula County Detention Facility PAQ states The agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, inmate handbooks, or other written formats. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Sheriff Office Curriculum Training Overview, not dated 4. 14 Certificates of Completion, PREA: Investigating Sexual Abuse in a Confinement Setting and the Missoula County Detention Facility. Interviews and on site file review: 1. Detective Lieutenant / Investigator

The interview with the Detective Lieutenant demonstrated the investigative team has completed specialized PREA training for investigators through the National Institute of Corrections.

Site Observation:

During the pre-audit phase specialized training records for investigators were uploaded to the online audit system.

(a-b) The Missoula County Detention Facility PAQ states the agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 16, section Procedure, states, “All criminal allegations of sexual abuse will be referred to the Missoula County Sheriff’s Office for investigation. MCDF will require specialized training be completed by investigators who will be conducting investigations of abuse in a confinement setting. Training will include NIC PREA: Investigating Sexual Abuse in a Confinement Setting which will cover Investigative Standards, Investigations, Working with Victims, Interviewing Techniques, and Institutional Culture and Investigations. MCDF will maintain documentation that investigators have completed the required specialized training. MCDF will utilize a PREA Investigation check list to ensure policy and procedures are being followed.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 15-16, section Policy (a-b), states, “To ensure that every allegation of sexual abuse in a correctional facility is thoroughly and appropriately investigated by a highly skilled, qualified investigator who has been trained to investigate sexual abuse allegations in confinement settings, all sexual abuse investigators shall be required to complete specialized training.

(a) In addition to the general training provided to all employees pursuant to PREA Standard 115.31, MCDF shall ensure that, to the extent the agency itself conducts sexual abuse administrative investigations, its investigators have received training in conducting such investigations in confinement settings.

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

The facility provided a Sheriff Office Curriculum Training Overview. Learning objectives include the following.

- PREA Update and Standards Overview
- Legal Issues and Liability
- Culture
- Trauma Victim Response
- Medical and Mental Health Care
- First Response and Evidence Collection
- Adult Interviewing Techniques
- Report Writing
- Report Writing
- Prosecutorial Collaboration

(c) The Missoula County Detention Facility PAQ states the agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 16, section Policy (c-d), state,

(a) MCDF will maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

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

The facility provided 14 Certificates of Completion, PREA: Investigating Sexual Abuse in a Confinement Setting. These certificates demonstrate Investigator Training was completed through the National Institute of Corrections for Investigators and the Missoula County Detention Facility.

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Wellpath – Prison Rape Elimination Act Training (PREA), not dated 4. 25 Wellpath Academy Certificates of Completion Prison Rape Elimination Act Training Interviews: 1. Health Services Coordinator - Contractor 2. Mental Health Coordinator - Contractor The interview with Medical and Mental Health Practitioners demonstrated each completes annual specialized training for medical and mental health practitioners, as well as annual training on the Missoula County Detention Facility PREA policy. They further demonstrated all contracted medical and mental health personnel are required to complete both the specialized training and annual PREA policy review. Site Observations: During the pre-audit phase, documentation demonstrating completion of the required specialized training for medical and mental health practitioners was uploaded to the Online Audit System. (a) The Missoula County Detention Facility PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The facility has 27 contractors who work at the facility have received training required by agency policy. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page

16-17, section Procedure, states, "MCDF is contracted with First Step Providence to provide forensic medical examinations by a SANE (Sexual Assault Nurse Examiner) and as such on site medical staff will not conduct forensic examinations. Medical and Mental Health care staff will complete specialized training on PREA standards and procedures to include: 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 juvenile victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. Medical and Mental Health care staff will be required to complete the Wellpath- PREA training prior to contact with inmates. Documentation of completion for each employee and the training curriculum are provided to MCDF PREA Compliance Coordinator.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 16, section Policy 1-4, states, "MCDF will ensure that all full and part-time medical and mental health care practitioners who work regularly in facilities will receive specialized training in:

- (1) How to detect and assess signs of sexual abuse and sexual harassment;
- (2) How to preserve physical evidence of sexual abuse;
- (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and
- (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment."

The facility provided Wellpath – Prison Rape Elimination Act Training (PREA). This curriculum includes the following:

- Description
- Learning Objectives
 - o Explain the zero tolerance policy.
 - o Describe how health care staff can maintain professional relationships with inmates that do not violate any PREA standards or facility policy.
 - o Identify characteristics which make an inmate more vulnerable to sexual abuse or harassment.
 - o Identify examples of "red flags" which may indicate an inmate has been the victim of sexual abuse or harassment.

o Describe the proper way for health care staff to preserve evidence of sexual abuse.

o Provide examples of the security and custody requirements for all facilities as described in the PREA standards.

The curriculum includes a knowledge check test and results for each of the above areas.

(b) The Missoula County Detention Facility PAQ states their medical staff do not conduct forensic medical exams.

(c) The Missoula County Detention Facility PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 16, section Policy (a-b), states,

(a) MCDF will maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.

(b) Medical and mental health care practitioners shall also receive the training mandated for employees under § 115.31 or for contractors and volunteers under § 115.32, depending upon the practitioner’s status at the agency.

The facility provided Wellpath Certificates of Completion Prison Rape Elimination Act Training for 25 contractors.

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews with medical and mental health practitioners demonstrated specialized PREA training is reinforced through both annual discipline-specific training and annual review of the Missoula County Detention Facility PREA policy, ensuring contracted practitioners remain knowledgeable regarding their PREA responsibilities. Documentation further demonstrated the contracted medical provider has developed a comprehensive PREA training curriculum specifically addressing the responsibilities of medical and mental health practitioners, including recognizing signs of sexual abuse and sexual harassment, preserving evidence, maintaining professional boundaries, responding professionally

	to victims, and reporting allegations or suspicions of sexual abuse. The curriculum further incorporates knowledge checks to verify comprehension of required PREA concepts. During the pre-audit phase, the facility uploaded documentation demonstrating completion of specialized PREA training, including 25 Wellpath Certificates of Completion, confirming consistent implementation of the training program for contracted medical and mental health personnel.
--	--

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Prison Rape Elimination Act (PREA) Inmate Rights Form, dated 4.2.2025 Interviews: 1. Random Inmates 2. Targeted Inmates 3. Classification Corporal Interviews with inmates demonstrated most remembered being asked risk screening questions regarding prior criminal history, prior violence, including sexual abusiveness or prior sexual victimization, sexual orientation, and whether they believed they were at risk of sexual victimization while at the facility. Of those inmates who stated they had not been asked or did not remember being asked the risk screening questions, file review demonstrated completed 72-hour and 30-day risk assessments for each. The interview with the Classification Corporal demonstrated risk assessments are completed within 72 hours of intake in a private one-on-one setting. He stated assessments include age, criminal history, prior sexual victimization or abusiveness in the community or an institutional setting, housing considerations, family information, gender identity, disability, and other factors impacting inmate safety. The Classification Corporal further demonstrated inmates are reassessed upon receipt of

new information, within 30 days of intake, and annually thereafter. He summarized the facility's approach by stating, "The bottom line is we look out for the people here and have staff monitor them to make sure they succeed."

Site Observations:

Through utilization of the PREA Audit – Adult Prisons & Jails Documentation Review Inmate File / Records Review template, review demonstrated 19 of the 26 inmates interviewed had been admitted within the past 12 months. Documentation demonstrated each initial risk screening was completed within the required 72-hour time frame and each reassessment was completed within 30 days of intake. Three inmates were additionally reassessed upon receipt of new information.

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 18, section 115.41-Obtaining information from inmates, Procedure, states, "MCDF provide each inmate with the Prison Rape Elimination Act (PREA) Inmate Rights Form and have it signed by inmate to ensure they fully understand the statement. Following acknowledgement of the Rights Form, a risk assessment will be completed by staff. The risk assessment will include all inmate information described in policy. Information will be confidential and only the scored designation will be available to all staff. The PREA Compliance Coordinator will receive information on all inmates who score as high risk for sexual victimization and for sexual abusiveness. Risk assessment will be completed within 72 hours of intake and reassessments will be completed within 30 days of arrival. Inmates who report an allegation of sexual abuse at MCDF will receive a reassessment following the reported allegations to update the inmate's risk level."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 17-18, section 115.41-Obtaining information from inmates, Policy (a), states, "MCDF will ensure that the facility has identified those at heightened risk of being sexually victimized and those at heightened risk of being sexually abusive so that it can make housing and programming decisions with the goal being to use information to prevent sexual abuse.

(a) All inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually

abusive toward other inmates.

(b) The intake screening shall ordinarily take place within 72 hours of arrival at the facility.

(c) Such assessments shall be conducted using an objective screening instrument.

(d) The intake screening shall 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;

(2) The age of the inmate;

(3) The physical build of the inmate;

(4) Whether the inmate has previously been incarcerated;

(5) Whether the inmate's criminal history is exclusively nonviolent;

(6) Whether the inmate has prior convictions for sex offenses against an adult or child;

(7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;

(8) Whether the inmate has previously experienced sexual victimization;

(9) The inmate's own perception of vulnerability; and

(10) Whether the inmate is detained solely for civil immigration purposes."

(b) The Missoula County Detention Facility PAQ states the number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other inmates with 72 hours of their entry into the facility was 1459. Policy compliance can be found in provision (a) of this standard.

(c) The Missoula County Detention Facility PAQ states the facility conducts risk assessments by using an objective screening instrument.

The facility provided a Risk Assessment. The Assessment includes the following:

Possible Victim Factors:

1. Victim of sexual assault in an institutional setting*

2. Experienced prior sexual victimization in community*
3. Youthful age (24 or younger in adult facility)
4. Elderly (65 or older)
5. Small physical stature (Male: 5'2" or less and/or 120 lbs. or less; Female: 5'0" or less and/or 95 lbs. or less)
6. Developmental disability/mental disability/physical disability
7. First time being incarcerated
8. Lesbian/gay/bisexual/transgender/intersex/gender non-conforming (admitted or perceived)
9. Offender has current or prior convictions for sex offenses against a child or adult
10. The inmate's criminal history is exclusive non-violent
11. Does the inmate consider themselves vulnerable?

Possible Aggressor Factors:

1. Previously perpetrated sexual abuse in an institutional setting*
2. Prior acts of sexual abuse in community*
3. Current or prior adjudication or convictions for violent offenses
4. History of prior institutional violence

*If answer is "Yes" to questions #1 or #2 in Victim or Aggressor sections – must offer inmate a referral to Mental Health Services Department

*Does the inmate wish to speak with mental health regarding these events?

Victim Designation Process:

If “Yes” to item #1, enter inmate as a “Known Victim”

If “Yes” to three or more items other than item #1, enter inmate as a “Potential Victim”

Otherwise, designate inmate as a “Non-Victim”

Aggressor Designation Process:

If “Yes” to item #1, enter inmate as a “Known Aggressor”

If “Yes” to two or more items other than item #1, enter inmate as a “Potential Aggressor”

Otherwise, designate inmate as a “Non-Aggressor”

(d) The Missoula County Detention Facility PAQ states the policy requires that the facility reassess each inmate’s risk of victimization or abusiveness within a set time period, not to exceed 30 days after the inmate’s arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. The number of inmates entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 30 days or more) who were reassessed for their risk of sexual victimization or of being sexually abusive with 30 days after their arrival at the facility based upon any additional relevant information received since intake was 469.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 17, section 115.41-Obtaining information from inmates, Policy (d) 1-10, states, “The intake screening shall 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;
2. The age of the inmate;
3. The physical build of the inmate;
4. Whether the inmate has previously been incarcerated;
5. Whether the inmate’s criminal history is exclusively nonviolent;

6. Whether the inmate has prior convictions for sex offenses against an adult or child;
7. Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
8. Whether the inmate has previously experienced sexual victimization;
9. The inmate's own perception of vulnerability; and
10. Whether the inmate is detained solely for civil immigration purposes."

(e-f) The Missoula County Detention Facility PAQ states the policy requires that the facility reassess each inmate's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the inmate's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. The number of inmates entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more and who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake was 623. The PAQ states, "We also do an annual Risk Assessment for inmates who have been here a year or more. I check that monthly. We use the same Risk Assessment for that."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 178 section 115.41-Obtaining information from inmates, Policy (e-f) state,

(e) "The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive. The intake screening shall consider, at a minimum, the following criteria to assess inmates for risk of sexual aggression:

- (1) Whether the inmate has perpetrated sexual abuse in an institutional setting;
- (2) Whether the inmate had prior acts of sexual abuse in the community;
- (3) Whether the inmate has current or prior adjudication or convictions for violent offenses;
- (4) Whether the inmate has a history of prior institutional violence.

(f) Within a set time period, not to exceed 30 days from the inmate's arrival at the facility, the facility will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening."

(g) The Missoula County Detention Facility PAQ states the policy requires that an inmate's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 18, section 115.41-Obtaining information from inmates, Policy (g) states, "An inmate's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness."

(h) The Missoula County Detention Facility PAQ states the policy prohibits disciplining inmates for refusing to answer (or for not disclosing complete information related to) questions regarding: (a) whether or not the inmate has a mental, physical, or developmental disability; (b) whether or not the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) whether or not the inmate has previously experienced sexual victimization; and (d) the inmate's own perception of vulnerability.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 18, section 115.41-Obtaining information from inmates, Policy (h) states, "Inmates may not be 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."

The facility provided a Missoula County Detention Facility Prison Rape Elimination Act (PREA) Inmate Rights Form. This form states the following to inmates. The Missoula County Detention Facility has ZERO TOLERANCE for sexual abuse and sexual harassment. You have the right to be free from sexual abuse and sexual harassment, as well as from retaliation for reporting such incidents while you are here. You will be provided with information regarding our agency's ZERO TOLERANCE policy and reporting procedures. We are asking the following questions to keep you sexually safe while in the Missoula County Detention Facility.

By signing this form, you acknowledge that you received the Sexual Assault and Staff Sexual Misconduct brochure during intake. You acknowledge that you were provided information on the zero-tolerance policy, that staff will investigate every report of abuse or harassment, inmates are never punished for reports of good faith, how to report sexual abuse, no one deserves to be abused or harassed, sexual abuse is never victim's fault, your right to be free from retaliation for reporting, and contact information to victim advocate services.

We are required to ask you a series of questions. Please understand that we are not forcing you to answer these questions, but we must ask each question individually. If you chose not to answer a particular question, we will not hold it against you in any way. If you choose to answer the question, it is important that you answer truthfully.

If you fully understand this statement, please sign and date."

(i) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 18, section 115.41-Obtaining information from inmates, Policy (i) states, "MCDF will implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates."

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility has implemented a comprehensive risk assessment process that extends beyond the minimum PREA requirements by integrating initial screening, 30-day reassessments, reassessments upon receipt of new information, and annual reassessments for inmates housed longer than one year. Interviews demonstrated risk assessments are conducted privately utilizing an objective screening instrument that evaluates victimization and abusiveness factors while identifying inmates requiring additional monitoring or mental health services. The Classification Corporal demonstrated the information obtained through the assessment process is actively used to make housing decisions, identify vulnerable inmates, and ensure appropriate monitoring, stating, "The bottom line is we look out for the people here and have staff monitor them to make sure they succeed." Documentation review demonstrated all required assessments were completed within established timeframes, with additional reassessments completed when warranted. The facility's PREA Rights Form, objective screening instrument, automatic mental health referral process, annual reassessment practice, and controlled dissemination of sensitive information collectively demonstrate a sustainable and proactive system designed to continually evaluate inmate safety and reduce the risk of sexual abuse throughout incarceration.

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Victim/Aggressor Tracking Sheet Interviews: 1. Targeted Inmates 2. Random Inmates 3. PREA Coordinator 4. Jail Commander 5. Captain Interviews with three LGBTI inmates and five inmates who disclosed prior sexual abuse demonstrated they were made to feel comfortable by both staff and other inmates, were not treated differently than other inmates, and felt comfortable within their assigned housing units. One inmate stated, "I feel comfortable here," while another commented, "No one touches me here," demonstrating confidence in both their housing placement and personal safety. The interviews with the PREA Coordinator and the Jail Commander demonstrated the facility utilizes a victim/aggressor tracking sheet to monitor housing placements and ensure identified victims and aggressors are housed separately from one another. The PREA Coordinator further demonstrated housing assignments are continually monitored and adjusted as necessary to maintain appropriate separation and inmate safety. (a) The Missoula County Detention Facility PAQ states the facility uses information from the risk screening required by §115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 18, section 115.42- Placement of inmates in housing, bed, program, education, and work assignments, Procedure, states, “MCDF will use the information from the risk screening to place inmates in appropriate housing assignments, job assignments and program assignments to reduce risk of sexual victimization. If an inmate is identified as transgender or intersex, he/she will be offered a separate time to shower when other inmates are locked down or do not have access to the shower. A transgender or intersex inmate’s own view with respect to his or her own safety shall be given serious consideration. Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year. MCDF will utilize the Transgender/Intersex Housing Determination Form for placement. MCDF Administrative staff will review any special circumstances with inmates on a weekly basis during the Inmate Managing Plan Meeting.”

The facility provided a Victim/Aggressor Tracking Sheet. The Tracking Sheet documents the following information.

- Booking date
- Cell
- Facility
- Pod
- Name
- Adult/Juvenile
- Aggressor / Victim
- Date Assessed

(b) The Missoula County Detention Facility PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each inmate.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 19, section 115.42- Placement of inmates in housing, bed, program, education, and work assignments, Policy (a), states, “MCDF shall use all information from the risk screening required by § 115.41 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

	(a) MCDF will make individualized determinations about how to ensure the safety of each inmate.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated inmates placed in protective custody continue to receive access to education and treatment programming. She stated availability may vary depending on scheduling and the specific program offered. The Jail Commander further stated all inmates, including those placed in protective custody for PREA-related reasons, are evaluated weekly through the inmate management plan to assess their ongoing needs and housing status. (a) The Missoula County Detention Facility PAQ states the agency has a policy prohibiting the placement of inmates at high risk for sexual victimization in involuntary segregated housing unless and an assessment of all available alternatives has been made and a determination has been made that there is not available alternative means of separation from likely abusers. The number of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 19-20, section 115.43- Protective Custody, Policy (a) states, “MCDF shall ensure that the facility does not automatically or routinely involuntarily segregate inmates at high

risk of sexual victimization or restrict their access to programming or other available activities based on their at-risk status.

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

(b) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 20, section 115.43- Protective Custody, Policy (b) 1-3, states, “Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document:

(1) The opportunities that have been limited;

(2) The duration of the limitation; and

(3) The reasons for such limitations.”

(c) The Missoula County Detention Facility PAQ states the number of inmates at risk of sexual victimization who were assigned to involuntary segregated housing in the past 12 months, for longer than 30 days while awaiting alternative placement was zero.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 19, section 115.43- Protective Custody, Policy (c), states, “MCDF will assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.”

(d) The Missoula County Detention Facility PAQ states from a review of case files of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months, the number of case files that include BOTH (a) a statement of the basis for facilities concern for the inmate’s safety, and (b) the reason or reason why alternative means of separation could not be arranged was zero.

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 19-20, section 115.43- Protective Custody, Policy (d) 1-2, states, “If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, the MCDF shall clearly document: 1. The basis for the facility’s concern for the inmate’s safety; and 2. The reason why no alternative means of separation can be arranged.” (e) The Missoula County Detention Facility PAQ states if an involuntary segregated housing assignment is made, the facility affords each such inmate a review every 30 days to determine whether there is a continuing need for separation from the general population. The PAQ states, ‘Weekly review of segregated housing assignments would occur during Inmate Management Plan meetings (Wednesday afternoon at 1:00).’ Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 20, section 115.43- Protective Custody, Policy (e), states, “Every 30 days, MCDF shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Inmate Information and Rule Book, dated 6.2024 4. Zero Tolerance Posting, not dated

Interviews:

1. Random Inmates
2. Targeted Inmates
3. Detention Officers
4. Jail Commander

Informal and formal interviews with inmates demonstrated they were comfortable reporting sexual abuse and sexual harassment verbally to any staff member and were aware of multiple reporting options, including the inmate tablet, submitting a kite, reporting to a family member or friend, and calling the hotline numbers posted on the Zero Tolerance flyers throughout the facility.

Interviews with Detention Officers demonstrated each would accept reports of sexual abuse or sexual harassment from inmates in any manner the information was provided.

Site Observation:

During the onsite review, the PREA hotline was tested utilizing an inmate telephone. Due to an isolated system glitch, the call could not be completed. The Jail Commander immediately researched the issue and provided system reports demonstrating successful hotline calls on the days preceding and following the onsite review, indicating the issue was isolated and the reporting system remained operational.

(a) The Missoula County Detention Facility PAQ states the agency has established procedures allowing for multiple internal ways for Inmates to report privately to agency officials about sexual harassment, abuse, retaliation and or any type of neglect.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 20-21, section, 115.51- Inmate Reporting, Procedure, states, “Regardless of its source, staff, contractors and/or volunteers who receive information concerning sexual abuse or sexual harassment behavior, or who observe an incident of sexual abuse and sexual harassment, or who have a reasonable cause to suspect that an inmate has been or is being subject to sexual abuse or harassment must immediately report such to his/her supervisor and the shift supervisor and/or designee. Staff cannot remain anonymous and have a duty to report violations. Staff who witness staff on inmate sexual abuse and/or sexual harassment can report privately to the PREA hotline or to the PREA Compliance Coordinator.

Inmates will have the option of reporting anonymously to an outside organization by calling the PREA Hotline at 1-406-258-DONT (3668). Calls to the PREA hotline are free of charge and will not be recorded. Inmates can also file a written grievance, file a written request to medical staff, have a third party report filed on their behalf via the website, <https://www.missoulacounty.us/government/public-safety/detention-facility>, and they can report verbally to any staff member.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 20-21, section, 115.51- Inmate Reporting, Policy (a), states, “MCDF will ensure that inmates and staff can report sexual abuse and sexual harassment, regardless of who the perpetrator is and regardless of what other dangers they may face for doing so, by providing them with multiple avenues to report, including an avenue outside the facility, so that even if the abuser is someone directly supervising that inmate or higher up in the authority chain, or a staff person or inmate who might retaliate against that inmate, the victim still has a safe way to report. Thus, sexual abuse and sexual harassment is always reported, which in turn is a deterrent of future abuse.

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

The facility provided a Missoula County Detention Facility Inmate Information and Rule Book. Page 15, bottom half of the page states, “The policy also encompasses an inmate, staff member, or volunteer’s right to be free from retaliation if they report an incident or participate in an investigation.

Inmates who are victims of, or have knowledge of, a PREA violation should immediately report the incident. Reports can be made verbally, in writing, anonymously, and via a third party. Below are the methods available to report:

1. Call an outside entity PREA Hotline to report by dialing 406-258-3668
2. Report to any staff member, volunteer, or contractor including medical and mental health care staff
3. Submit a grievance or an inmate request
4. Report to the facility’s PREA Compliance Coordinator or any administration staff
5. Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on your behalf through a third-party grievance to prea@missoulacounty.us. The third-party reporting form can be found on the website

at <https://www.missoulacounty.us/government/public-safety/detention-facility/prison--rape-elimination-act>

6. Inmates may also submit reports on another inmate's behalf, or someone at the facility may report for an inmate using the methods listed above

Missoula County Detention Facility has partnered with the YWCA to provide survivors of sexual abuse with emotional support services. To access these services, contact 1-800-483-7858 or sent a letter to: YWCA 1800 S 3rd St W, Missoula, MT 59801."

The facility provided a Zero Tolerance Posting. The posting includes the following reporting information.

"HOW TO REPORT

The Missoula County Detention Facility offers multiple ways to report sexual abuse and sexual harassment. Reports can be made verbally, in writing, anonymously, and via a third party.

Below are the methods available to report.

- Call an outside entity PREA Hotline to report by dialing 406-258-3668.
- Report to any staff member, volunteer or contractor, including medical and mental health care staff.
- Submit a grievance or an inmate request.
- Report to the facility's PREA Compliance Coordinator.
- Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on your behalf through a third-party grievance to prea@missoulacounty.us. The third-party reporting form can be found on the website at <https://www.missoulacounty.us/government/public-safety/detention-facility/prison-rape-elimination-act>
- You also can submit a report on someone's behalf, or someone at the facility can report for you using the methods listed above.

Additional Reporting for Federal Inmates ONLY:

- Write a letter reporting the alleged sexual misconduct to the person in charge

or the

- USMS. To ensure confidentiality, use special (Legal) mail procedures
- Write to the Office of Inspector General (OIG), which investigates allegations of staff misconduct. The address is: Office of Inspector General, U.S. Department of Justice, 950 Pennsylvania Ave. Room 4706, Washington, DC. 20530
- Call, at no expense to the victim, the OIG. The phone number is 1-800-869-4499.

VICTIM SUPPORT SERVICES

Missoula County Detention Facility has partnered with the YWCA to provide survivors of sexual abuse with emotional support services. To access these services, contact 1-800-483-7858 or send a letter to: YWCA 1800 S 3rd St W, Missoula, MT 59801.”

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 21, section, 115.51- Inmate Reporting, Policy (b), states, “MCDF will also provide at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the program and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Inmates detained solely for civil immigration purposes shall be provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security.”

(c) The Missoula County Detention Facility PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties.

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 20, section, 115.51- Inmate Reporting, Policy (c)(d), state, (c) “Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports. (d) MCDF will provide inmates with access to tools necessary to make a written report.” (d) The Missoula County Detention Facility PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of inmates. Staff are informed of these procedures in the following ways. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 20, section, 115.51- Inmate Reporting, Policy (e), states, “MCDF will provide a method for staff to privately report sexual abuse and sexual harassment of inmates.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Inmate Notification of Investigation Extension, not dated 4. Missoula County Detention Facility Complete Inmate Grievance, not dated 5. Missoula County Detention Facility Inmate Information and Rule Book, dated 6.2024

Interviews:

1. Random Inmates
2. Targeted Inmates
3. PREA Coordinator

Interviews with inmates demonstrated they were aware of the grievance procedures. Inmates stated grievance forms are easily accessible upon request to an officer and that they always have access to writing materials or that materials are provided upon request.

The interview with the PREA Coordinator demonstrated grievance boxes are checked daily by Unit Managers or other designated staff, including weekends.

Site Observation:

During the onsite review, grievance boxes were observed outside the control booth of each housing unit, providing inmates with access to the grievance process.

(a) The Missoula County Detention Facility PAQ states the agency has an administrative procedure for dealing with Inmate grievances regarding sexual abuse.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 23, section 115.52- Exhaustion of administrative remedies, Procedures, states, “MCDF has an established 3rd party reporting form specifically for sexual abuse, available on the website, <https://www.missoulacounty.us/government/public-safety/detention-facility> which will then be emailed to a confidential email, prea@missoulacounty.us.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 21-22 section 115.52- Exhaustion of administrative remedies, Policy (a) 1-4, states, “To ensure that the substance of sexual abuse allegations are heard and evaluated by both confinement facilities and federal courts, when appropriate, without being barred by procedural requirements.

(a)(1) MCDF will not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.

(2) MCDF may apply otherwise-applicable time limits on any portion of a grievance that does not allege an incident of sexual abuse.

(3) MCDF will not require an inmate to use any informal grievance process, or to

otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

(4) Nothing in this section shall restrict the agency's ability to defend against a lawsuit filed by an inmate on the ground that the applicable statute of limitations has expired."

(b) The Missoula County Detention Facility PAQ states agency policy does not require an inmate to use an informal grievance process, or otherwise to attempt to resolve with staff, an alleged incident of sexual abuse. Policy compliance can be found in provision (a) of this standard.

(c) The Missoula County Detention Facility PAQ states the agency's policy and procedure allows an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency's policy and procedure requires that an inmate grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 22, section 115.52- Exhaustion of administrative remedies, Policy (b) 1-2, states, "(b) MCDF will ensure that—

1. An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and

2. Such grievance is not referred to a staff member who is the subject of the complaint."

(d) The Missoula County Detention Facility PAQ states the agency's policy and procedures that require a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months there have been zero grievances filed alleging sexual abuse;

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 22, section 115.52- Exhaustion of administrative remedies, Policy (c) 1-4, state,

1. MCDF will issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

2. Computation of the 90-day time period shall not include time consumed by inmate in preparing any administrative appeal.

3. MCDF may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the inmate in writing of any such extension and provide a date by which a decision will be made.

4. At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level.”

The facility provided a Missoula County Detention Facility Inmate Notification of Investigation Extension. This documents the following information.

PREA Standard 115.52 Exhaustion of administrative remedies: MCDF may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision.

- Date:
- PREA Incident #:
- Inmate Name:
- Date of initial PREA report:
- 90-day closure date:
- 70-day extension date:
- Investigation Type: ☐ Sexual Harassment ☐ Sexual Abuse
- Date Investigation Began:
- Investigating Agency: ☐ Missoula County Detention Facility ☐ Missoula County Sheriff’s Office
- Reason for extension:

The form is signed and dated by both the inmate and PREA Compliance Coordinator.

(e) The Missoula County Detention Facility PAQ states agency policy and procedure permits third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates. Agency policy and procedure requires that if an inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the

agency documents the inmate's decision to decline. The number of grievances alleging sexual abuse filed by inmates in the past 12 months in which the inmate declined third-party assistance, containing documentation of the inmate's decision to decline was zero.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 22, section 115.52- Exhaustion of administrative remedies, Policy (d) 1-3, state,

(1) “Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of the inmate.

(2) If a third-party file such a request on behalf of the inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.

(3) If the inmate declines to have the request processed on his or her behalf, MCDF shall document the inmate's decision.”

(f) The Missoula County Detention Facility PAQ states the facility has a policy and established procedures for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. The facilities policy and procedures for emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours. The facilities policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within 5 days. Zero grievances were received alleging substantial risk of imminent sexual abuse, that were filed in the past 12 months, reached final decisions within 40 days.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 22-23, section 115.52- Exhaustion of administrative remedies, Policy (e) 1-2, state,

(1) “MCDF will establish procedures for the filing of an emergency grievance alleging that the inmate is subject to a substantial risk of imminent sexual abuse.

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

	sexual abuse and the action taken in response to the emergency grievance.” The facility provided a Missoula County Detention Facility Inmate Information and Rule Book. Page 16-17, section 512. Grievance Procedures, states, “Inmates may utilize the formal grievance process when they believe there are legitimate issues they wish to address about conditions of confinement, treatment, PREA, or other aspects of their stay with MCDF. Inmates will not express their grievances in disruptive, threatening, or insubordinate manners. Inmates will not agitate or organize other inmates into any sort of disruptive action or organized resistance against facility policy, orders, procedures, or personnel. Inmates who have grievances will submit them in writing after attempting an informal resolution.” (g) The Missoula County Detention Facility PAQ states the facility has a written policy that limits its ability to discipline an inmate for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the Inmate filed the grievance in bad faith. In the past 12 months, there have been zero grievances alleging sexual abuse to occasions where the agency demonstrated that the Inmate filed the grievance in bad faith. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 23, section 115.52- Exhaustion of administrative remedies, Policy (f) states, “MCDF may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Inmate Information and Rule Book, dated 2022

4. Zero Tolerance Posting, not dated
5. Missoula County Detention Facility – Missoula County Detention Facility – Sexual Assault and Staff Misconduct Brochure, not dated
6. Memorandum of Understanding between Missoula County Detention Center and the YWCA, dated 8.19.2025

Interviews:

1. Random Inmates
2. Targeted Inmates
3. Detention Officers

Interviews with staff and inmates demonstrated awareness of the victim advocate information posted throughout the facility. A percentage of inmates stated they were aware of the YWCA and the availability of victim advocacy services. During the onsite review, the Auditor recommended the facility provide additional information describing the advocacy services available to inmates. In response to the recommendation, the Jail Commander supplemented the advocate information and posted the additional information to the inmate tablet system during the onsite review.

Site Observation:

During the onsite review, the Auditor contacted the YWCA utilizing an inmate telephone located within a housing unit. After identifying the purpose of the call, the advocate stated the agency does not accept reports on behalf of inmates; however, advocates are available to accompany victims during forensic medical examinations and provide ongoing emotional support services by telephone following an incident of sexual abuse.

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

- Giving inmates (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) of local, State, or national victim advocacy or rape crisis organizations.
- Does not give inmates mailing addresses and telephone number (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes; and

- Enables reasonable communication between inmates and these organizations, in as confidential manner as possible.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 23-24, section 115.53- Inmate access to outside confidential support services, Procedure, states, “MCDF has established an MOU with the YWCA which is a rape crisis center for victim advocacy. Victim advocates are available 24/7. Inmates can call the YWCA free of charge and MCDF will not record those calls. Written correspondences are not treated as confidential and would be subject to inspection. Contact information for the YWCA is published in the Inmate Information and Rule Book and on posters in the unit.

Because there is only one person on call 24/7 at the YWCA, inmates may be asked to leave a message with a name and contact number for a return call. Return calls will be made within 2 hours by a victim advocate. If an alleged victim is asked to leave a message, staff will notify the *contracted mental health team person who has completed the PREA: Behavioral Health Care for Sexual Assault Victims in a Confinement Setting training. The contracted mental health team person will respond and assist the alleged victim in contacting the YWCA.

YWCA

1800 S 3rd Street W

Missoula, MT 59801

1-800-483-7858

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 23, section 115.53- Inmate access to outside confidential support services, Policy (a), states, “MCDF will provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. MCDF will enable reasonable communication between inmates and these organizations and agencies, as confidential manner as possible.”

The facility provided a Missoula County Detention Facility – Missoula County Detention Facility – Sexual Assault and Staff Misconduct Brochure. The brochure provided the following information.

- Sexual assault and staff sexual misconduct are against the law.
- MCDF is committed to your safety and the safety of staff.
- MCDF has ZERO TOLERANCE for sexual assault.

- What is sexual assault
- Examples of sexual assault
- How to prevent sexual assault
- What to do if you've been sexually assault
- PREA Hotline at 1.406.258.3668
- YWCA provides survivors of sexual abuse with emotional support services - to include YWCA address and phone number.
- How to report sexual assault and your options

The facility provided a Zero Tolerance for Sexual Abuse and Sexual Harassment Posting. This posting includes the following information.

Victim Support Services

Missoula County Detention Facility has partnered with the YWCA to provide survivors of sexual abuse with emotional support services. To access these services, contact 1-800-483-7858 or send a letter to: YWCA 1800 S 3rd St W, Missoula, MT 59801.

The facility provided a Missoula County Detention Facility Inmate Information and Rule Book. Page 16, section 509. Prison Rape Elimination Act (PREA), states, "Missoula County Detention Facility has partnered with the YWCA to provide survivors of sexual abuse with emotional support services. To access these services, contact 1-800-483-7858 or send a letter to: YWCA 1800 S 3rd St W, Missoula, MT 59801."

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

Missoula County Detention Facility PREA Policy and Procedure - Adult Facility, page 23, section 115.53- Inmate access to outside confidential support services, Policy (b), states, "MCDF will inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will

	be forwarded to authorities in accordance with mandatory reporting laws.” (c) The Missoula County Detention Facility PAQ states the facility maintains memoranda of understanding with community service providers that are able to provide inmates with emotional support services related to sexual abuse. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 23, section 115.53- Inmate access to outside confidential support services, Policy (c), states, “MCDF will 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. MCDF will maintain copies of agreements or documentation showing attempts to enter into such agreements.” The facility provided a Memorandum of Understanding between Missoula County Detention Center and the YWCA. The MOU appears to be current with no stated expiration date. The MOU is signed by the Missoula County Juvenile Detention Center Jail Commander and the YMCA Director of Programs. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard Auditor Discussion Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Prison Rape Elimination Act Third Party Reporting Form, not dated 1. Random Inmates

2. Targeted Inmates
3. Detention Officers
4. PREA Coordinator

Interviews with inmates demonstrated they were aware of third-party reporting options and stated family members or friends could report allegations of sexual abuse or sexual harassment on their behalf. Inmates also stated they could report concerns to contracted medical or mental health practitioners.

Interviews with staff demonstrated each would immediately report any third-party allegation to their direct supervisor, the PREA Coordinator, and law enforcement, as appropriate.

Site Observation:

During the onsite review, PREA Zero Tolerance flyers containing third-party reporting information were observed throughout the visitation area. Inmates demonstrated access to the PREA application on the inmate tablet system, which provides the Zero Tolerance information and available reporting options. Inmates also demonstrated access to PREA information and the messaging system through kiosks located within their housing unit.

(a) The Missoula County Detention Facility PAQ states the facility provides a method to receive third-party reports of inmate sexual abuse or sexual harassment. The agency publicly distributes information on how to report Inmate sexual abuse or sexual harassment on behalf of Inmates.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 24, section 115.54- Third-party reporting, Procedure, states, “Any reports of sexual abuse or harassment from a third parties should be immediately referred to the PREA Compliance Coordinator. MCDF has an established 3rd party reporting form specifically for sexual abuse, available on the website, <https://www.missoulacounty.us/government/public-safety/detention-facility> which will then be emailed to a confidential email, prea@missoulacounty.us. Third-party reports of sexual abuse and sexual harassment can also be reported via the PREA Hotline at 1-406-258-3668. MCDF will display a poster in the lobby and visiting areas (and other areas deemed appropriate) outlining how third parties can report an incident of sexual abuse or sexual harassment. “

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page

24, section 115.54- Third-party reporting, Policy, states, "To ensure facilities accept third-party reports of sexual abuse and sexual harassment taking place inside the facility that comes to their attention and to trigger an investigation. MCDF will establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate. "

The facility provided a Missoula County Detention Facility Prison Rape Elimination Act Third Party Reporting Form. This form allows reporting parties to report the following information.

Top of the form states, "Anonymous reporting is permitted"

- Inmates Name
- Date of Alleged Incident
- Time of Alleged Incident
- Who was involved
- What Happened
- Where did it occur
- How did it occur
- Any other pertinent information

Please provide your community contact information in case we need to follow-up with you (OPTIONAL):

- Your name
- Telephone #:
- Email

Upon completion of this form, please return to the receptionist. You may also email this form to prea@missoulacounty.us or fax to 406-258-4080, Attn: PREA Coordinator.

On 4.25.2026 at 9:32 am the following email to PREA@missoulacounty.us:

	My name is Karen Murray, and I am currently preparing to conduct a PREA audit at the Missoula County Sheriff's Office Jail and Juvenile facilities. Could you please advise what steps are taken if a complaint of sexual harassment or sexual abuse is received through this email address? Thank you in advance for your assistance. I appreciate any information you are able to provide. On 4.27.2026 at 8:18 am, the following response was received from the agency PREA Coordinator. "If there was a complaint through this email, I would respond immediately to it and get the information I needed. If it was a friend or family member of an inmate, I would want the information about the inmate and what they were reporting so I could start the investigation process. If it was an inmate writing to me, then I would follow-up with them and get the information needed to start the investigation." Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. Random Inmates 2. Targeted Inmates 3. Detention Officers 4. PREA Coordinator Interviews with inmates demonstrated they were aware of multiple reporting options

and were comfortable reporting directly to Detention Officers. Inmates consistently stated they felt safe within the facility and comfortable reporting sexual abuse or sexual harassment to staff, anonymously or by name through the kite and grievance systems, utilization of the PREA hotline, or by reporting to a trusted adult in the community.

Interviews with Detention Officers demonstrated each would accept reports of sexual abuse or sexual harassment from any source. Staff further stated they would immediately report any knowledge, suspicion, or information regarding an allegation, regardless of how the information was received.

The interview with the PREA Coordinator demonstrated she would accept and respond to any report of sexual abuse or sexual harassment, regardless of the source of the allegation. She further stated allegations believed to involve potential criminal conduct are referred to the Sheriff's Office for criminal investigation.

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 24, section 115.61- Staff and agency reporting duties; Reporting of allegations, Policy (a), states, “To establish a strong, effective reporting culture among staff and ensure that the facility receive timely information about sexual abuse, sexual harassment, retaliation, and staff neglect or violations of responsibilities that may have contributed to an incident or retaliation. The standard requires the agency to ensure facility staff report all allegations, while also taking steps to protect the confidentiality of sexual abuse information by sharing internally with only those who need to know.

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

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 24, section 115.61- Staff and agency reporting duties; Reporting of allegations, Policy (b), states, “Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.”

(c) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 24, section 115.61- Staff and agency reporting duties; Reporting of allegations, Policy (c), states, “Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform inmates of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services.”

(d) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 24-25, section 115.61- Staff and agency reporting duties; Reporting of allegations, Policy (d), states, “If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, MCDF will report the allegation to the designated State or local services agency under applicable mandatory reporting laws.”

(e) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.61- Staff and agency reporting duties; Reporting of allegations, Policy (e), states, “MCDF will report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators.”

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Missoula County Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023

Interviews:

1. Under Sheriff

The interview with the Undersheriff demonstrated the PREA Risk Assessment is completed during the classification of the inmate and is utilized to determine the best housing assignment. The detention center does not house known or potential victims with known or potential aggressors. Each housing unit utilizes a housing flowchart to guide housing decisions based on the PREA Risk Assessment. The assessment is reevaluated within 30 days of the inmate's intake. Classification Officers use the information to determine housing assignments and document them within the facility's Records Management System (RMS). The PREA Coordinator reviews the updated information, provides the 30-day inmate education, and runs a daily report to verify housing assignments for inmates identified as potential victims or aggressors. This process allows staff to identify and promptly correct any inappropriate housing assignments.

(a) The Missoula County Detention Facility PAQ states when the agency or facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the Inmate. In the past 12 months, the facility reports zero inmates were subject to substantial risk of imminent sexual abuse. Upon discovery of Inmate being subject to substantial risk, the facility immediately separates the victim from the perpetrator. The PAQ states, "Inmates are not placed in housing units until the PREA Risk Assessment has been completed. Inmates are not housed prior to their unique risk determination."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.62- Facility protection duties, Procedure, states, "All inmates will complete a Risk Assessment at intake to determine housing classification. MCDF will not house known or potential victims with known or potential aggressors. Staff will follow the PREA Incident Response Flowchart and Checklist immediately when learning an inmate is subject to substantial risk of imminent sexual abuse in order to take appropriate action to protect the inmate."

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.62- Facility protection duties, Policy, states, “When MCDF learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. Jail Commander 2. Under Sheriff The interview with the Jail Commander and the Undersheriff demonstrated both were aware that upon receiving an allegation an inmate was sexually abused while confined at another facility, they are responsible for notifying the head of the facility or appropriate office where the alleged abuse occurred. Both stated they would ensure the allegation is documented, appropriate notifications are made, and maintain communication with the receiving agency, as appropriate. The Undersheriff further stated the facility has not received any reports within the past 12 months involving inmates alleging sexual abuse while confined at another facility. He also stated that the last report received was in 2024, the facility received notification from another agency regarding an allegation of sexual abuse reported to have occurred at the Missoula County Detention Facility. The allegation was investigated and determined to be unfounded. Site Observation:

Documentation and interviews demonstrated the facility had not received any allegations during the audit period involving inmates reporting sexual abuse while confined at another facility.

(a) The Missoula County Detention Facility PAQ states the agency has a policy requiring that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency's policy also requires that the head of the facility notify the appropriate investigative agency. In the past 12 months, the facility has received zero allegations that an inmate was abused while in confinement at another facility.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25-26, section 115.63- Reporting to other confinement facilities, Procedure, states, "If any inmate at intake, or any other time, reports being sexually abused in another facility, staff will immediately notify the supervisor who will relay the information to the Commander. The Commander will then contact the head of the facility of the agency where the alleged abuse occurred and shall notify the appropriate investigative agency. Notification will be made no later than 72 hours after receiving the allegation and will be documented."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.63- Reporting to other confinement facilities, Policy (a), states, "To ensure that allegations of custodial sexual abuse that are reported to any facility are timely investigated by the facility where the abuse allegedly occurred. The intent of the standard is to urge facility heads to send the notification to an individual or office that will ensure the facility takes immediate steps to investigate the allegation appropriately and promptly. It is important that the person receiving the report of sexual abuse at the facility understands the seriousness and gravity of the allegation, and that the communication originated at the highest level of the reporting facility."

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

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

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.63- Reporting to other confinement facilities, Policy (b), states, “Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.” (c) The Missoula County Detention Facility PAQ states the facility documents that it has provided such notification within 72 hours of receiving the allegation. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.63- Reporting to other confinement facilities, Policy (c), states, “MCDF will document that it has provided such notification.” (d) The Missoula County Detention Facility PAQ states facility policy requires that allegations received from other agencies or facilities investigated in accordance with the PREA standards. In the last 12 months, there have been zero allegations of sexual abuse the facility received from other facilities. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.63- Reporting to other confinement facilities, Policy (d), states, “The facility head that receives such notification shall ensure that the allegation is investigated in accordance with these standards.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.64	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023

3. Missoula County Detention Facility PREA First Responder Flow Chart, not dated

Interviews:

1. Detention Officers

Interviews with Detention Officers demonstrated each was aware of their first responder responsibilities, to include separating the alleged victim and alleged perpetrator, ensuring both are safe, immediately notifying supervisory staff, preserving evidence by ensuring involved parties do not shower, eat, drink, change clothing, use the restroom, brush their teeth, or otherwise compromise physical evidence, and securing the area where the incident occurred until released by investigative personnel.

(a) The Missoula County Detention Facility PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to separate, preserve, protect, collect physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

In the past 12 months, six allegations occurred where an inmate was sexually abused. Of these allegations of sexual abuse in the past 12 months, the number of times the first security staff member to respond to the report separated the alleged victim and abuser was three.

In the past 12 months, the number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence was zero.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25-26, section 115.64- Staff first responder duties, Policy, states, “If any inmate at intake, or any other time, reports being sexually abused in another facility, staff will immediately notify the supervisor who will relay the information to the Commander. The Commander will then contact the head of the facility of the agency where the alleged abuse occurred and shall notify the appropriate investigative agency. Notification will be made no later than 72 hours after receiving the allegation and will be documented.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.64- Staff first responder duties, Procedure 1-4, states, “The first staff member to respond to an incident shall be required to:

- (1) Separate the alleged victim and abuser;
- (2) Preserve and protect the scene until appropriate steps can be taken to collect any evidence. (Follow PREA Incident Response Flowchart and Checklist)
- (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
- (4) If the abuse occurred within at time period that still allows for the collection of physical evidence, request that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.”

The facility provided a Missoula County Detention Facility PREA First Responder Flow Chart. The flow chart demonstrates clear direction for the first responder to:

- Separate the alleged victim and abuser
 - o Assess the victims’ acute medical needs
 - o Inform the victim of his or her rights
 - o Explain the need for a forensic exam
 - o Offer outside victim advocate
 - o MCDF Mental Health provide crisis intervention counseling
 - o Provide for any special needs the victim may have
- Preserve and protect the scene
- Collect physical evidence
- Request the alleged abuser and victim don’t take any actions that could destroy physical evidence

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

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 25, section 115.64- Staff first responder duties, Procedure (5), states, “If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility PREA Flow Chart Inmate on Inmate Sexual Abuse Allegation, not dated 4. Missoula County Detention Facility First Responder Flow Chart, not dated 5. Missoula County Detention Facility PREA Flow Chart, Staff on Inmate Sexual Abuse Allegation, not dated 6. PREA Coordinated Response, dated 5.18.2023 Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated all employees have access to the Coordinated Response Plan through the agency's shared G-Drive. Site Observation: Review of the facility's Coordinated Response Plan demonstrated clear direction to staff regarding their responsibilities in response to allegations of sexual abuse and sexual harassment. Coordinated Response Flow Charts were observed in a housing

unit control booth, ensuring staff have immediate access to first responder responsibilities and reporting procedures.

(a) The Missoula County Detention Facility PAQ states the facility developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 26-27, section 115.65 Coordinated Response, Policy, states, “MCDF first responders will follow the PREA Incident Response Flowchart and Checklist, the MCDF PREA Coordinated Response, and requirements of PREA Standard 115.64.

At a minimum, the following is to be determined in the plan:

1. Separating the inmate victim from the alleged abuser.
2. Assessment of the victim’s acute medical needs.
3. Informing the victim of his or her rights under relevant Federal and State law.
4. Explanation of the need for a forensic medical exam and offering the victim the option of undergoing one.
5. Offering the presence of a victim advocate or a qualified staff member to be present during the exam.
6. Providing crisis intervention counseling.
7. Interviewing the victim and any witnesses.
8. Collecting evidence.
9. Providing for any special needs the victim may have.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 26, section 115.65 Coordinated Response, Policy states, “MCDF will develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. “

The facility provided a Missoula County Detention Facility PREA flow charts outlining

	each departments responsibility upon receipt of the following: · Staff on Inmate Sexual Abuse Allegation · Inmate on Inmate Sexual Abuse Allegation · First Responder The facility provided a PREA Coordinated Response demonstrating the following instruction is outlined for departments responding to and incident of sexual harassment or sexual abuse. · First Responders · Unit Manager · Shift Supervisor · Deputies from the Missoula County Sheriff's Office · Medical · Mental Health Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Agreement between the County of Missoula and Association of Federal, State, County and Municipal Employees (AFSCME) Detention Officers, Association of Missoula County, term of contract 7.1.2025 – 6.30.2027

Interview:

1. Under Sheriff

The interview with the Undersheriff demonstrated there is no language in either contract that restricts or limits the agency's ability to remove staff sexual abusers from contact with inmates pending the outcome of an investigation or appropriate disciplinary action. He further stated agency policy, §610.37, specifically provides that the Missoula County Detention Facility will ensure collective bargaining agreements, contracts with other entities, or voluntary policies do not limit the agency's ability to remove alleged staff, contractors, or volunteer sexual abusers from contact with inmates pending the outcome of an investigation or a determination of whether and to what extent disciplinary action is warranted.

(a) The Missoula County Detention Facility PAQ states the agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.

Note: The PREA Disclosure Form all staff are required to sign states they will face termination under the discipline process for PREA violations and/or failure to disclose."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 27, section 115.66 Preservation of ability to protect inmates from contact with abusers, Policy, states, "MCDF will ensure that the Detention Officer contract with Missoula County collective bargaining unit will not limit the agency's ability to remove alleged staff sexual abusers from contact with inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 27, section 115.66 Preservation of ability to protect inmates from contact with abusers, Procedure, states "To help prevent staff sexual abuse and foster a culture of reporting, recognizing that: inmates are more likely to report sexual abuse when MCDF is able to protect them from further abuse and when staff are held accountable for engaging in sexual abuse; and holding staff accountable for committing sexual abuse discourages future abuse. To ensure that employee collective bargaining agreements do not present a barrier to an agency's ability to protect inmates from contact with alleged sexual abusers during investigations or hinder an agency's ability to discipline staff who have been found to have engaged in sexual abuse of inmates."

	The facility provided an Agreement between the County of Missoula and the Association of Federal, State, County and Municipal Employees (AFSCME) Detention Officers, Association of Missoula County. Page three, Article 5: Management Rights, subsection six, states, “take whatever actions may be necessary to carry out the missions of the agency in situations of emergency,” demonstrating that employees may be relieved of duty when not adhering to agency expectations and mission. The contract appears to be currently implemented, as evidenced by Commissioner signatures, and reflects a contract term of 7.1.2025 – 6.30.2027. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.67	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility PREA Monitoring Form, dated 3.2022 Interviews: 1. PREA Coordinator The interview with the PREA Coordinator demonstrated she meets with alleged victims on the day a sexual abuse allegation is received and continues to meet with them face-to-face at least monthly for 90 days. She stated each meeting is documented while she monitors for retaliation, to include changes in inmate or staff behavior, frivolous housing changes, disciplinary reports, and any other indicators of retaliation, while ensuring the inmate continues to feel safe.

(a) The Missoula County Detention Facility PAQ states the agency has 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. The agency designates PREA Coordinator as the Retaliation Monitor.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 28, section 115.67 Facility protection against retaliation, Procedure, states, “MCDF will protect all inmates and staff who report sexual abuse or sexual harassment from retaliation by other inmates and staff. The PREA Compliance Coordinator will monitor retaliation for at least 90 days following a report of sexual abuse using the retaliation form. Monitoring will be completed via face-to-face contact with the inmate or staff monthly, and will include review of any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Monitoring will also include periodic status checks of the inmate. If any individual who cooperated with an investigation expresses a fear of retaliation, MCDF will take appropriate measures to protect that individual against retaliation. Retaliation of inmates and/or staff may be reviewed in the Inmate Management Plan meeting to discuss multiple protection measures for the victim and abuser. Retaliation monitoring will terminate if the allegation is unfounded; if it is unsubstantiated, monitoring will continue for 90 days. If a report is made by a staff member who reported the incident after witnessing sexual assault and are reporting on behalf of the inmate, the PREA Compliance Coordinator will monitor the reporting staff member for retaliation. MCDF will not put victims in involuntary segregated housing unless it is necessary for the inmate’s protection. If victims are placed in involuntary segregated housing, staff will provide justification on the PREA Victim Housing Preference Segregation Review Form. MCDF will offer all staff members who fear retaliation emotional support services.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 27-28, section 115.67 Facility protection against retaliation, Policy (a), states, “Inmate, staff, contractors, volunteers, or third-party reporters who choose to file a report of sexual abuse or sexual harassment, or cooperate with an investigation, shall not be subject to any form of retaliation related to the reporting of or participation in an investigation of such.

(a) MCDF will establish a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff and shall designate which staff members or departments are charged with monitoring retaliation.”

The facility provided a Missoula County Detention Facility PREA Monitoring form. The form documents the following information.

- Basic Information

- o PREA Incident #: / Facility: Adult or Juvenile
- o Type of Allegation / Allegation Date
- o Monitoring Begin Date / Monitoring Expiration Date
- o Alleged Victim Being Monitored and Global #:
- o Staff / Inmate Witness Being Monitored and Global # / Employee ID#

- In Person Status Check / Date / Person Monitoring

- o Face to Face Contact
- o Reviewed Program Changes
- o Reviewed Disciplinary Reports
- o Reviewed Employee Evaluation
- o Reviewed Shift Change
- o Reviewed Housing Changes
- o File Grievance
- o Reviewed Employee Evaluations

(b) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 28, section 115.67 Facility protection against retaliation, Policy (b), states, “MCDF will employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or, for cooperating with investigations.”

(c) The Missoula County Detention Facility PAQ states the facility monitors the conduct or treatment of Inmates or staff who reported sexual abuse and of Inmates who were reported to have suffered sexual abuse to ascertain if there are any changes that may suggest possible retaliation by Inmates or staff. The facility will monitor conduct or treatment until the Inmate is discharged. The facility acts promptly to remedy any such retaliation. In the past 12 months, the facility has had zero incidents of retaliation. The PAQ states, “Retaliation monitoring will extend beyond 90 days if initial monitoring indicates a continuing need.”

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 28, section 115.67 Facility protection against retaliation, Policy (c), states, “For at least 90 days following a report of sexual abuse, MCDF will monitor the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff and shall act promptly to remedy any such retaliation. Items MCDF should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. MCDF shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.” (d) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 28, section 115.67 Facility protection against retaliation, Policy (d), states, “In the case of inmates, such monitoring shall also include periodic status checks. (e) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 28, section 115.67 Facility protection against retaliation, Policy (e), states, “If any other individual who cooperates with an investigation expresses a fear of retaliation, MCDF shall take appropriate measures to protect that individual against retaliation.” (f) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 28, section 115.67 Facility protection against retaliation, Policy (f), states, “MCDF’s obligation to monitor shall terminate if MCDF determines that the allegation is unfounded.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.68	Post-allegation protective custody
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility,

dated 4.2023

Interviews:

1. Jail Commander

The interview with the Jail Commander demonstrated protective custody is never utilized solely to protect vulnerable inmates and is only considered when there is an immediate and substantial safety concern or upon an inmate's request. She further stated she could not recall any instance during the past 12 months in which protective custody was required for this purpose. The Jail Commander explained victims are kept separate from their perpetrators by documenting housing restrictions within the inmate contact notes, creating a clear record of the required separation and ensuring staff throughout the facility are aware of the housing limitations.

(a) The Missoula County Detention Facility PAQ states the agency has a policy prohibiting the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers.

The number of inmates who allege to have suffered sexual abuse who were held in involuntary segregated housing in the past 12 months for one to 24 hours awaiting completion of assessment was zero.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 29, section 115.68 - Post-allegation protective custody, Policy, states, “MCDF will not isolate any inmates who have alleged to have suffered sexual abuse, unless it is a last resort when less restrictive measures are inadequate to keep them and other inmates safe, and then only until an alternative means of keeping all inmates safe can be arranged. If the inmate who has alleged to have suffered sexual abuse requests to be placed in isolation, staff will discuss continued housing options with the inmate daily. Staff will complete the PREA Victim Housing Preference Form with the victim prior to a housing change to ensure the victim feels safe returning to general population. The form will be signed by staff and the inmate and placed in the inmate file. Inmates shall also have access to other programs and work opportunities to the extent possible and any restriction will be documented. The inmate will be re-assessed every 30 days and their situation reviewed during the weekly Inmate Managing Plan meeting.”

	Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 28-29, section 115.68 - Post-allegation protective custody, Procedure, states, “To ensure that MCDF does not automatically, or routinely involuntarily segregate inmates alleged to have suffered sexual abuse or restrict their access to programming or other available activities, recognizing that any form of involuntary segregation and restrictions to programming or other privileges can be experienced as punitive by inmate. MCDF prohibits involuntary segregation of inmates who reported sexual abuse unless no available alternative means of separation from likely abusers exists. Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the requirements of § 115.42.” Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The Jail Commander demonstrated protective custody is not utilized as a routine response for vulnerable inmates or inmates alleging sexual abuse and could not recall a situation during the past 12 months in which protective custody was required for that purpose. Rather than relying on restrictive housing, the facility demonstrated victims are protected through documented housing limitations entered into inmate contact notes, ensuring separation requirements are immediately communicated to staff throughout the facility. Documentation further demonstrated the agency has established multiple safeguards to prevent unnecessary placement in protective custody, including completion of a PREA Victim Housing Preference Form prior to any housing change, daily housing discussions when requested by the inmate, continued access to programs and work opportunities whenever possible, documentation of any restrictions imposed, 30-day reassessments, and weekly review through the Inmate Managing Plan meeting. Collectively, interviews, documentation, and observations demonstrated the facility has established a comprehensive, inmate-centered process that prioritizes individualized safety planning while minimizing the use of restrictive housing.
--	--

115.71	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Investigative Report

Interviews:

1. Targeted Inmate
2. Detective Lieutenant / Investigator

The interview with one inmate who reported sexual harassment demonstrated she had previously reported an incident while housed at the facility, was interviewed by an investigator, and received notification of the investigative outcome.

The interview with the Investigator demonstrated his investigative process includes securing the crime scene, gathering statements, interviewing all involved parties and witnesses, remaining sensitive to the trauma experienced by victims and staff, and collecting all available evidence. He further stated the decision to utilize Miranda or Garrity warnings is based on the nature of the allegation.

Site Observation:

Review of investigations utilizing the PREA Audit – Adult Prisons & Jails Documentation Review – Investigations template demonstrated all 10 investigations reviewed complied with the applicable requirements of the standard.

(a) The Missoula County Detention Facility PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section Procedure, states, “Investigations of sexual abuse will be referred to the Missoula County Sheriff’s Office. Deputies who respond for investigation will have completed special training in sexual abuse investigations pursuant to § 115.34. Administrator investigations will use the PREA Checklist form and document in a written report. The final report will be submitted to the PREA Compliance Coordinator.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 29, section Policy (a), states, “MCDF will ensure that all allegations of sexual abuse and sexual harassment are investigated thoroughly and properly so that incidents are substantiated when they should be, both to deter these incidents and to increase reporting.

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

(b) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 29, section Policy (b), states, “Where sexual abuse is alleged, MCDF shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.34.”

(c) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 29, section Policy (c), states, “Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.”

(d) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 29, section Policy (d), states, “When the quality of evidence appears to support criminal prosecution, MCDF shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.”

(e) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 29, section Policy (e), states, “The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person’s status as inmate or staff. MCDF will not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.”

(f) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section Policy (f) 1-2, states, “Administrative investigations:

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

2. Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.”

(g) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section Policy (g), states, “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.”

(h) The Missoula County Detention Facility PAQ states substantiated allegations of conduct that appear to be criminal are referred for prosecution. The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since August 20, 2012, or since the last PREA audit, whichever is later was zero.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section Policy (h), states, “Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.”

The facility provided a Missoula County Detention Facility Investigative Report demonstrating the following is documented.

- Summary of Allegation
- Statements/Reports/Interviews
- Audio/Video Review
- Retaliation Monitoring
- Credibility Statement
- Documenting of Evidence
- Conclusion

The report also includes the following documentation.

- Professional Standards of Consult
- DCI Consult
- Notice of Investigation
- Follow-Up Interview
- Resignation

	· DCI Follow-Up · Summary/Conclusion (i) The Missoula County Detention Facility PAQ states the agency retains all written reports pertaining to administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section Policy (i), states, “The MCDF shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by MCDF, plus five years.” (j) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section Policy (j), states “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.” (k) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section Policy (k), states “Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements.” (l) Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section Policy (k), states “When outside agencies investigate sexual abuse, MCDF shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Missoula County Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023
3. PREA Investigative Report Form, Missoula County Detention Facility, dated 4.2023

Interviews:

1. Detective Lieutenant / Investigator

The interview with the Investigator demonstrated administrative investigations are conducted to determine whether allegations of sexual abuse or sexual harassment are substantiated based on the evidence obtained during the investigation. He further stated criminal investigations are conducted in accordance with applicable legal requirements and that probable cause is required before criminal charges are pursued.

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 31, section 115.72 Evidentiary standard for administrative investigations, Procedure, states, “MCDF will utilize the PREA Checklist to ensure investigations are being conducted properly and a post investigation review will take place within 30 days of the determination.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 30, section 115.72 Evidentiary standard for administrative investigations, Policy, states, “To ensure that all administrative investigations into allegations of sexual abuse and sexual harassment use the correct standard of proof – a preponderance of the evidence, which means the greater weight of the evidence. Using the proper evidentiary standard enables an agency to substantiate actual incidents of sexual abuse and sexual harassment in non-criminal investigations. Consistent, properly done investigations into allegations, including using the appropriate evidentiary standard, will increase the chances that consequences will follow substantiated reports of sexual abuse and sexual harassment while also encouraging reporting and deterring further abuse. MCDF will impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual

	harassment are substantiated. The facility provided a PREA Investigative Report form, Missoula County Detention Facility. The form documents the following information. - Global #: / Inmate Name - Date Referred for Investigation - Date Investigation Began / Date / Time - Alleged Victim's Interview / Date / Time - Alleged Aggressor Interview / Date / Time - Other Staff/Pertinent Individual(s) Interview(s) - Other Inmate(s) Interview(s) - Explanation of Witness Statement Forms Not Completed and/or Other Interviews Not Completed - Physical Evidence; Credibility Assessment; Other Included Reports/Information - Case Outcome to include investigative facts - Signature of Investigating Officer - Date Investigation Completed Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.73	Reporting to inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: - Missoula County Detention Facility PAQ - Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 - Completed Missoula County Detention Facility PREA Post Investigation Inmate

Notifications, dated 8.2025

Interviews:

1. PREA Coordinator

The interview with the PREA Coordinator demonstrated inmates are notified verbally and in writing of investigative outcomes by documenting the notification on the Post Investigation Resident Notification form and uploading the completed form into the New World Jail Management System.

Site Observation:

Review of investigations utilizing the PREA Audit – Adult Prisons & Jails Documentation Review – Investigations template demonstrated inmates who reported sexual abuse were consistently notified of investigative outcomes or provided the additional notifications required by §115.73.

(a) The Missoula County Detention Facility PAQ states the agency has a policy requiring that any inmate who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the agency/facility in the past 12 months was 40. Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of inmates who were notified, verbally or in writing, of the results of the investigation was 24. The PAQ states, “16 of the 40 investigated were Non-PREA issues that were reported”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 31, section 115.73- Reporting to inmates, Procedure, states, “Staff on Inmate Allegations: Following an investigation into an inmate’s allegation of sexual abuse suffered at the MCDF, the inmate will be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. If the investigation was completed by the Missoula County Sheriff’s Department, MCDF will request the relevant information in order to inform the inmate. Following an inmate’s allegation that a staff member has committed sexual abuse against the inmate, MCDF will inform the inmate (unless the program has determined that the allegation is unfounded) whenever: The staff member is no longer posted within the inmate’s unit; The staff member is no longer employed at MCDF; The staff member has been indicted on a charge related to sexual abuse within MCDF; or The staff member has been convicted on a charge related to sexual abuse within MCDF.

Inmate on Inmate Allegations: Following an inmate's allegation that he or she has been sexually abused by another inmate, MCDF will inform the alleged victim whenever: The alleged abuser has been indicted on a charge related to sexual abuse within MCDF; or The alleged abuser has been convicted on a charge related to sexual abuse within MCDF. All such notifications or attempted notifications shall be provided to the inmate in writing on a "Post Allegation Inmate Notification Response Form" by the PREA Compliance Coordinator (or designee) and be kept in the inmate's file.

Note: Obligation to report outcomes to the inmate shall terminate if the inmate is released from the agency.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 31, section 115.73- Reporting to inmates, Policy, states, "To ensure agencies increase the likelihood that inmates will report incidents of sexual abuse, by ensuring that their reports will be taken seriously and fully investigated. Inmates may not be aware of the steps MCDF will take to address a report of sexual abuse, and informing inmates of the results of investigations will, at a minimum, let the inmate know that the report has been addressed and investigated.

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

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

All notifications or attempted notification shall be documented."

(b) The Missoula County Detention Facility PAQ states if an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the inmate as to the outcome of the investigation. The number of investigations of alleged inmate sexual abuse in the facility that were completed in the past 12 months is three.

(c) The Missoula County Detention Facility PAQ states following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency/facility subsequently does inform the Inmate (unless the agency has determined that the allegation is unfounded) whenever:

- The staff member is no longer posted within the Inmate's unit;

- 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.”

The facility provided completed Missoula County Detention Facility PREA Post Investigation Inmate Notifications. This notification documents the following:

- Inmate Notice/Date of Notification
- Booking Number / Incident Number
- Nature of Allegation
- Allegation Category
- Investigation conducted by outside agency
- Date Investigation began and ended
- Finding of investigation
- PREA Coordinator / Date
- PREA Coordinator Signature
- Inmate Signature / Date

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

(e) The Missoula County Detention Facility PAQ states the agency has a policy that all notifications to inmates described under this standard are documented. In the past 12 months, there has been three notifications to an inmate, pursuant to this standard. Of those notifications made in the past 12 months, the number that were documented was three.

	Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated the agency maintains full authority to impose disciplinary action for violations of agency sexual abuse or sexual harassment policies. She stated staff who engage in prohibited conduct would no longer be employed by the facility when warranted by the outcome of the investigation and disciplinary process. Site Observation: Documentation and interviews demonstrated the facility had no staff who violated agency sexual abuse or sexual harassment policies during the previous 12 months. (a) The Missoula County Detention Facility PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. In the past 12 months, the number of those staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies was zero. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32, section 115.76- Disciplinary sanctions for staff, Procedure, states, “Any MCDF staff member under investigation for sexual abuse will be placed on administrative leave pending

the investigation to eliminate contact between the inmate and the abuser.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32, section

115.76- Disciplinary sanctions for staff, Policy (a), states, “To protect inmates from staff sexual abuse and sexual harassment, and to hold staff accountable for violating MCDF sexual abuse or sexual harassment policies.

(a) Staff shall be subject to disciplinary sanctions up to and including termination for violating MCDF sexual abuse or sexual harassment policies.

(b) The Missoula County Detention Facility PAQ states in the last 12 months, there has been zero staff from the facility that had violated agency sexual abuse or sexual harassment policies.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32, section

115.76- Disciplinary sanctions for staff, Policy (b), states, “Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.”

(c) The Missoula County Detention Facility PAQ states disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In the past 12 months there have zero staff requiring discipline for sexual abuse or sexual harassment.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32, section

115.76- Disciplinary sanctions for staff, Policy (c), states, “Disciplinary sanctions for violations of MCDF 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.”

	(d) The Missoula County Detention Facility PAQ states all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff have been terminated for sexual abuse or harassment. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32, section 115.76- Disciplinary sanctions for staff, Policy (d), states, “All terminations for violations of MCDF sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.” Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard Auditor Discussion Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, 6.8.2022 Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated any volunteer or contractor who engages in sexual abuse or sexual harassment would be immediately removed from the facility, reported to law enforcement, and referred to any applicable licensing or certifying agencies, as appropriate.

Site Observation:

Documentation and interviews demonstrated the facility had no volunteers or contractors who violated agency sexual abuse or sexual harassment policies during the previous 12 months.

(a) The Missoula County Detention Facility PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with Inmates. In the past 12 months, there have been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of Inmates.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32, section 115.77- Corrective action for contractors and volunteers, Procedure, states, “Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies and to any relevant licensing bodies unless the activity was clearly not criminal. MCDF will take appropriate corrective measures and will consider whether to prohibit further contact with inmate, in the case of any violations of MCDF sexual abuse or sexual harassment policies by a contractor or volunteer.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32, section 115.77- Corrective action for contractors and volunteers, Policy, states, “To protect inmates from sexual abuse and sexual harassment from contractors and volunteers, and to hold contractors and volunteers accountable for violating MCDF sexual abuse or sexual harassment policies. Consistent and meaningful corrective actions demonstrate MCDF’s commitment to sexual safety, and ensure that contractors and volunteers follow agency policies, thus deterring sexual abuse and sexual harassment of inmates in the facility.”

(b) The Missoula County Detention Facility PAQ states the facility takes appropriate remedial measures and considers whether to prohibit further contact with Inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. Policy compliance can be found in provision (a) of this standard.

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard Auditor Discussion Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. Jail Commander The interview with the Jail Commander demonstrated inmates who sexually abuse other inmates are afforded the disciplinary process and due process protections prior to the imposition of disciplinary sanctions. She further stated inmates are reassessed following the incident, and referrals to medical, mental health, advocacy, and other appropriate services are made as needed, with weekly follow-up visits conducted to monitor their well-being. (a-c) The Missoula County Detention Facility PAQ states inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. Inmates are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. In the past 12 months there have been one administrative findings of inmate-on-inmate sexual abuse have occurred at the facility. In the past 12 months there has been zero criminal findings of guilt for inmate-on-inmate sexual abuse, occurring at the facility. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 33, section 115.78- Interventions and disciplinary sanctions for inmates, Policy, states, “MCDF promotes a safe environment with established rules that are designed to protect the inmate and staff. Inmates shall understand the program rules, as well as the consequences for not meeting them. Rule violations shall be addressed through a consistent and fair process as outlined in the Inmate Information and Rule Book. An inmate will be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-

inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

Any disciplinary sanctions will be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

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

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

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

All sexual activity between inmates is prohibited and may result in Level 2 disciplinary action as outlined in the Inmate Information and Rule Book (series #4203)."

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32-33, section 115.78- Interventions and disciplinary sanctions for inmates, Procedure, states, "To ensure that inmates are held accountable for inmate-on-inmate sexual abuse through a formal disciplinary process that provides appropriate and measured sanctions commensurate with the nature and circumstances of the abuse, the inmate's disciplinary history and sanctions imposed for comparable offenses by inmates with similar histories. Imposing consistent disciplinary sanctions demonstrates MCDF's commitment to sexual safety and helps deter sexual abuse. The disciplinary process considers factors such as mental capacity, intent, and what resources or supports can be offered to the inmate abuser to support rehabilitation.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 32, section 115.78- Interventions and disciplinary sanctions for inmates, Procedure, second paragraph, states, "An inmate will be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse."

	(d) The Missoula County Detention Facility PAQ states the facility does offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. However, the facility does not require participation as a condition of access to programming or other benefits. (e) The Missoula County Detention Facility PAQ states the agency disciplines inmates for sexual contact with staff only upon finding that the staff member did not consent to such contact. Policy compliance can be found in provisions (a-c) of this standard. (f) The Missoula County Detention Facility PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. (g) The Missoula County Detention Facility PAQ states the agency prohibits all sexual activity between Inmates. If the agency prohibits all sexual activity between inmates and disciplines inmates for such activity, the agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced. Policy compliance can be found in provisions (a-c) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility 14 Day Mental Health Tracker, dated 6.2.2022

Interviews:

1. Random Inmates
2. Targeted Inmates
3. Mental Health Coordinator
4. Health Services Coordinator

Interviews with inmates demonstrated they were offered mental health services during the intake process and throughout their confinement at the facility.

Interviews with medical and mental health practitioners demonstrated disclosures of prior sexual victimization or abusiveness identified during the risk assessment process, through collateral information, or by inmate report are referred for medical and mental health follow-up, when accepted by the inmate.

Site Observation:

Review of inmate files demonstrated disclosures of prior sexual victimization or abusiveness were documented and offers of medical and/or mental health follow-up services were documented, as applicable.

(a, c) The Missoula County Detention Facility PAQ states all Inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.41 are offered a follow-up meeting with a medical or mental health practitioner. Follow up meetings are offered within 14 days of the intake screening. In the past 12 months 100% of inmates who disclosed prior victimization during the intake screening were offered a follow-up meeting with a medical or mental health provider. Medical and mental health staff maintain secondary materials, documenting compliance with the above required services.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 34, section 115.81- Medical and mental health screenings; History of sexual abuse; Information Management, Policy, states, “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, MCDF shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

If the screening pursuant to § 115.41 indicates that an inmate has previously

perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, MCDF shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.

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, MCDF shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

Any information related to sexual victimization or abusiveness that occurred in an institutional setting will be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

Medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting unless the inmate is under the age of 18.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 33-34, section 115.81- Medical and mental health screenings; History of sexual abuse; Information Management, Procedure, states, “To require MCDF to timely address any medical, mental health, or security needs concerning inmates who have experienced or perpetrated prior sexual abuse, either in a confinement setting or in the community. Identifying and offering treatment to inmates with prior victimization is intended to address immediate mental health needs. Identifying and offering a follow-up meeting with a mental health practitioner to prior abusers has the potential to reduce future incidents of sexual abuse and create an improved overall sense of safety within MCDF.

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

The facility provided a Missoula County Detention Facility 14 Day Mental Health Tracker. This form documents the following.

- See by

	• Unit • Name • Reason for Referral • Referral type • Date referred • Date Seen • MHP • Additional Notes (e) The Missoula County Detention Facility PAQ states medical and mental health practitioners do obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institution setting unless the inmate is under the age of 18. Policy compliance can be found in provision (a) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 3. Missoula County Detention Facility Emergency Mental Health & Medical Treatment Tracker, not dated Interviews: 1. Mental Health Coordinator

2. Health Services Coordinator

Interviews with facility personnel demonstrated inmates are provided access to emergency medical and mental health services. Staff stated medical and mental health personnel are immediately notified upon receipt of an allegation of sexual abuse.

The interview with the Health Services Coordinator demonstrated First Step provides emergency medical and mental health services to victims of sexual abuse. She stated services are initiated upon the inmate's arrival at First Step, where forensic evidence collection, when appropriate, is completed by qualified medical personnel.

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 34, section 115.82- Inmate access to emergency medical and mental health services, Policy, states, “Victims of sexual assault in a facility will have access to emergency medical and mental health services.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 34, section 115.82- Inmate access to emergency medical and mental health services, Procedure, states, “

Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.

If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, staff first responders shall take preliminary steps to protect the victim pursuant to § 115.62 and will immediately notify the appropriate medical

and mental health practitioners.

Inmate victims of sexual abuse while incarcerated will be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Mental health and medical services will be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

A written MOU has been established for outside services for emergency medical and mental health services.”

The facility provided a Missoula County Detention Facility Emergency Mental Health & Medical Treatment Tracker. This form documents the following.

- Inmate Name
- Inmate Number
- Victim or Aggressor
- Incident Date
- Provided Victim Advocate
- Mental Health and Medical – Indicate if seen by MCDF staff or transported to 1st Step and /or St. Pat’s Hospital for SANE/SAFE

(c) The Missoula County Detention Facility PAQ states Inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Policy compliance can be found in provision (a/b) of this standard.

(d) The Missoula County Detention Facility PAQ states Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Policy compliance can be found in provision (a/b) of this standard.

	Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. Mental Health Coordinator – Contractor 2. Health Services Administrator Interviews with medical and mental health practitioners demonstrated ongoing treatment recommendations designated by hospital personnel are implemented immediately upon a victim's return from a forensic medical examination, as well as upon receipt of an allegation of sexual abuse. Both practitioners stated appropriate medical and mental health evaluations, along with individualized treatment plans, are developed to ensure a continuum of care for both the victim and the alleged perpetrator beginning on the day the incident occurs. Practitioners further demonstrated services are coordinated to address immediate medical and mental health needs while providing ongoing support, follow-up treatment, and additional interventions as clinically indicated. (a-c) The Missoula County Detention Facility PAQ states the facility offers medical and mental health evaluation and, as appropriate, treatment to all Inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 35, section 115.83- Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers; Victim Services, Policy (a)-(c), states, “To ensure that an inmate who has

experienced sexual abuse in any confinement setting is offered treatment services.

a. MCDF will offer medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

b. Treatment of sexual abuse victims will include, follow-up services, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from MCDF.

c. The treatment services will be consistent with the community level of care.”

(d-e) The Missoula County Detention Facility PAQ states female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 35, section 115.83- Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers; Victim Services, Policy (d)(e), state,

(d) Victims of sexually abusive vaginal penetration while at MCDF will be offered pregnancy tests. If pregnancy is detected, victims will receive information about and timely access to all lawful pregnancy- related medical services.

(e) Victims of sexual abuse while at MCDF will be offered tests for sexually transmitted infections as medically appropriate.

(f) The Missoula County Detention Facility PAQ states Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 35, section 115.83- Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers; Victim Services, Policy (e), states, “Victims of sexual abuse while at MCDF will be offered tests for sexually transmitted infections as medically appropriate.”

(g) The Missoula County Detention Facility PAQ states treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 35, section 115.83- Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers; Victim Services, Policy (f), states, “Treatment services will be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. MCDF will attempt to conduct a mental health evaluation for all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. “

(h) The Missoula County Detention Facility PAQ states if the facility is a prison, it attempts to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners. This provision is not applicable as the facility is a jail.

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews with medical and mental health practitioners demonstrated a coordinated continuum of care begins immediately upon receipt of an allegation of sexual abuse and continues following a victim's return from a forensic medical examination. Practitioners demonstrated hospital treatment recommendations are implemented without delay, appropriate medical and mental health evaluations are completed, and individualized treatment plans are developed to address the ongoing needs of both victims and alleged perpetrators as clinically indicated. Documentation further demonstrated victims are offered follow-up medical and mental health services, referrals for continued care when transferred or released, pregnancy testing and pregnancy-related medical services when applicable, sexually transmitted infection testing as medically appropriate, and treatment consistent with the community standard of care. Services are provided without financial cost to the victim and regardless of whether the victim identifies the alleged abuser or participates in the investigation. Collectively, interviews, documentation, and observations demonstrated the facility has established a comprehensive, coordinated, and victim-centered system that emphasizes immediate intervention, continuity of care, and ongoing access to medical and mental health services beyond the minimum requirements of the standard.

115.86	Sexual abuse incident reviews
---------------	--------------------------------------

	Auditor Overall Determination: Meets Standard
--	--

	Auditor Discussion
--	---------------------------

Document Review:

1. Missoula County Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023
3. Completed Missoula County Detention Facility PREA Administrative & Response Review Form, dated 8.30.2024

Interviews:

1. Jail Commander

The interview with the Jail Commander demonstrated the Sexual Abuse Incident Review Team consists of the Jail Commander, Captain, Lieutenant, Chief, Mental Health, Unit Manager, Line Sergeant, PREA Coordinator, and one line staff member. She stated the team reviews the incident in its entirety, to include staff actions, supervisory oversight, video footage, compliance with policy and procedure, opportunities for improvement, potential corrective actions, the motivation for the incident, and the demographics of those involved. The Jail Commander further stated she and the Assistant Commander of Operations are responsible for overseeing the implementation and sustainment of the team's recommendations.

Site Observation:

Review of investigations demonstrated three sexual abuse incident reviews were completed during the previous 12 months. Of those reviews, two involved unsubstantiated allegations and one involved a substantiated allegation.

(a) The Missoula County Detention Facility PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months there has been three administrative investigations of alleged sexual abuse completed at the facility,

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 35, section 115.86- Sexual abuse incident reviews, Policy, states, “At the conclusion of every sexual abuse investigation, an incident review will be completed to evaluate whether any changes in policy or practice at the facility need to be made. The incident review process is intended to allow the facility to identify systemic problems in policies, practices, dynamics, physical barriers, staffing levels, and monitoring what may have contributed to an incident or allegation of sexual abuse, so that the facility can improve conditions to avoid future incidents of allegations.”

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 36, section 115.86- Sexual abuse incident reviews, Procedure first paragraph, states, “Within 30 days of the conclusion of the sexual abuse investigation, the PREA Compliance Coordinator will conduct a sexual abuse incident review utilizing the MCDF Administrative & Response Review Form.

The review team will include upper-level management officials with input from Unit Managers, investigators, and medical or mental health practitioners.

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

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

The facility provided a Missoula County Detention Facility PREA Administrative & Response Review Form. This form documents the following.

- Victims Name / Allegation Type / Date of Incident
- Incident # / Incident Type / Facility type
- At the time of the incident, did staffing levels meet required ratio?

- o If yes, was staffing sufficient?
 - o Did incident involve new staff (within 120 days of hire)?
 - o If yes, had new staff received all training (including adequate on the job training/ shadowing?)
 - o Was veteran staff current on training?
 - o At the time of the incident, was staff in their assigned area?
 - o Were inmates in assigned area?
 - o Were there any physical barriers to supervision (outside of line of sight, closed door, etc.)?
 - o Any other factors not addressed above?
-
- Did Inmate Risk Assessments take place at intake (Including documentation in file)?
 - Were room assignments appropriate?
 - Has the alleged perpetrator previously been identified as a potential threat to others?
 - If yes, was any action taken (prior to the incident) to reduce potential threat?
 - Did the alleged incident take place in an area under video surveillance?
 - If yes, were cameras working?
 - Should monitoring technology be deployed or augmented to supplement supervision by staff?
-
- Is there any indication the incident was motivated by race, ethnicity, gender identity, LGBTQI identification, status or perceived status or gang affiliation?
 - Is there any indication the incident was motivated by any other group dynamics at the facility?
 - Is there a need for a Recommendations & Implementation plan?
 - If yes, were they documented and attached to this form?
 - Are there indications in the allegation or investigation that signify a need to change policy or practice to better prevent, detect, or respond to sexual abuse?

	1. Final report and summary of findings with recommendations for improvement, for the questions mark with an *. 2. If unable to implement the recommendations above, reason are documented below. 3. Date incident was reviewed at Missoula County Detention facility. 4. Administrative Team Members Present Jail Administrator Signature / Date PREA Compliance Coordinator Signature / Date Classification Officer / Unit Manager Signature / Date Medical / Mental Health Signature / Date (c) The Missoula County Detention Facility PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners. Policy compliance can be found in provision (b) of this standard. (d) The Missoula County Detention Facility PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA Coordinator. Policy compliance can be found in provision (b) of this standard. (e) The Missoula County Detention Facility PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so. Policy compliance can be found in provision (b) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.87	Data collection
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Missoula County Detention Facility PAQ
2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023
3. 2025 PREA Annual Report, Missoula County Detention Facility

(a)/(c)-1,2

The Missoula County Detention Facility PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 36, section 115.87- Data collection, Policy, states, “To ensure that agencies collect uniform data on how many allegations of sexual abuse are made at its facilities, the type of sexual abuse alleged, and how the allegations were resolved. Collecting this data and comparing the data annually can reveal trends or changes in facility sexual safety. The standard envisions sharing of the data annually with the Department of Justice to increase the knowledge of the prevalence of sexual abuse in correctional facilities. Additionally, increasing the available data and information on the incidence of sexual abuse consequently improves the agency and facility management.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 36, section 115.87- Data collection, Procedure, states, “MCDF will collect accurate, uniform data for every allegation of sexual abuse in the facility. The PREA Compliance Coordinator will maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Data collected by site PREA Compliance Coordinator shall 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. The PREA Compliance Coordinator will aggregate the incident-based sexual abuse data at least annually. Upon request, MCDF will provide all such data from the previous calendar year to the Department of Justice no later than June 30.”

The facility provided a 2025 PREA Annual Report, Missoula County Detention Facility. The report documents the following information. · Year in Review: Aggregated Data - o Allegations - o Investigations - o Breakdown · Missoula County PREA Goals and Values - o Prevention - o Policies and Practices - o Investigations and Response · Missoula County's Commitment to Values - o Culture and Community - o Inmate Support - o Better Practices · Analysis - o Comparisons - o Progress Made - o Analysis · Impact - o Final Thoughts: From Our Population · Resources (b) The Missoula County Detention Facility PAQ states The annual report includes a comparison of the current year's data and corrective action from prior years. (d) The Missoula County Detention Facility PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.
--

	(e) The Missoula County Detention Facility PAQ states N/A as the agency does not contract with private facilities. This provision is not applicable as the agency does not contract with private facilities. (f) The Missoula County Detention Facility PAQ states the Department of Justice has requested agency data for the previous calendar year. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	---

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 Interviews: 1. Under Sheriff The interview with the Undersheriff demonstrated the PREA Coordinator is responsible for reviewing and aggregating PREA data to identify problem areas and patterns of concern. He stated corrective action is determined based on the issues identified, and the review process is ongoing to ensure continual improvement within the Sheriff's Office and, specifically, the Detention Facility. Once the annual data review is presented to and approved by the Jail Commander, it is made available to the public through the agency's website. (a) The Missoula County Detention Facility PAQ states the agency reviews data collected and aggregated pursuant to §115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training, including: · Identifying problem areas;

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

The facility will begin this process in 2023 once a full year of data is compiled.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 36-37, section 115.88- Data review for corrective action, Policy, states, “To ensure that required sexual abuse data is used to identify problem areas, and to take ongoing corrective action to improve the prevention, detection and response policies and practices of the facility and agency.

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

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

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 37, section 115.88- Data review for corrective action, Procedure states, “MCDF will 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. Data reviewed will include the following: identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each program, as well as the organization as a whole.

The report will include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of the organization’s progress in addressing sexual abuse. MCDF’s report shall be approved by the Commander and made readily available to the public through the website.

MCDF may redact specific material from the reports when publication would present a

	clear and specific threat to the safety and security of a program but must indicate the nature of the material redacted.” (c) The Missoula County Detention Facility PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head. The following is the agency website where the annual reports will be located is https://www.missoulacounty.us/government/public-safety/detention-facility (d) The Missoula County Detention Facility PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. Policy compliance can be found in provision (b) of this standard. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: 1. Missoula County Detention Facility PAQ 2. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, dated 4.2023 (a) The Missoula County Detention Facility PAQ states the agency ensures that incident-based and aggregate data are securely retained. Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 37, section 115.89- Data storage, publication, and destruction, Policy, states, “To ensure that sexual abuse data is published appropriately for transparency while ensuring the safe

storage of data to protect confidentiality, and to ensure that data is not destroyed prematurely. To inform the public about the levels of sexual abuse experienced by people in confinement and raise awareness of the issue, while also protecting the privacy of inmates who have been sexually abused.”

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 37, section

115.89- Data storage, publication, and destruction, Procedure, states, “MCDF will ensure that data collected pursuant to § 115.87 is securely retained for at least 10 years after the date of its initial collection unless Federal, State, or local laws require otherwise. Hard copies of data are secured at the facility in either the Human Resources office or the PREA Compliance Coordinator’s office.

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

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

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

(b) The Missoula County Detention Facility PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.

Missoula County Detention Facility PREA Policy and Procedure – Adult Facility, page 37, section

115.89- Data storage, publication, and destruction, Procedure, third paragraph, states, “MCDF will make all aggregated sexual abuse data, from programs under its direct control readily available to the public at least annually through its website. “

(c) The Missoula County Detention Facility PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.

	Policy compliance can be found in provision (b) of this standard.) Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.
--	--

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(a) During the prior three-year audit period, the agency ensured that each facility operated was audited, once. (b) This is the fourth audit cycle for Missoula County Detention Center and the first year of the fifth audit cycle. (c) The Auditor was granted complete access to, and the ability to observe, all areas of the facility. (d) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information). (e) The Auditor was permitted to conduct private interviews with residents. (f) Inmates were permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard

	Auditor Discussion
	(b) The agency has posted the current 2023 PREA audit report, on their website. Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

Appendix: Provision Findings**115.11 (a) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**

Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
--	-----

Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
---	-----

115.11 (b) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Has the agency employed or designated an agency-wide PREA Coordinator?	yes
--	-----

Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
--	-----

Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
--	-----

115.11 (c) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	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
---	-----

115.12 (a) Contracting with other entities for the confinement of inmates

If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
---	----

115.12 (b) Contracting with other entities for the confinement of inmates

Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	na
---	----

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

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

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

	facility does not have female inmates.)	
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	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 with inmates with disabilities including inmates who: Have intellectual disabilities?	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: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	

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

	consent or refuse?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b) Hiring and promotion decisions		
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c) Hiring and promotion decisions		
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.17 (d) Hiring and promotion decisions		
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes
115.17 (e) Hiring and promotion decisions		
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees?	yes
115.17 (f) Hiring and promotion decisions		
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have	yes

	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?	
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the	yes

	agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	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
115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	yes

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

	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	na
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with	yes

	inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	

	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes
	Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes
115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes

	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and Garrity warnings? (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 sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	

	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions 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
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	yes
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental	yes

	health care practitioners who work regularly in its facilities.)	
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following	yes

	criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	
	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
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	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) Whether the inmate is detained solely for civil immigration purposes?	yes
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates?	yes
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of	yes

	being sexually abusive, to inform: Education Assignments?	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (d)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (e)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (f)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.42 (g)	Use of screening information	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they	yes

	are at high risk of sexual victimization have access to: Programs to the extent possible?	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
115.43 (c)	Protective Custody	
	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d)	Protective Custody	
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation	yes

	can be arranged?	
115.43 (e)	Protective Custody	
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a)	Inmate reporting	
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b)	Inmate reporting	
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain anonymous upon request?	yes
	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.)	na
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	

	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision,	yes

	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.)	
	At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.).	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days?	yes

	(N/A if agency is exempt from this standard.)	
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, 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.)	yes
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency maintain or attempt to enter into memoranda of	yes

	understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse?	
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of	yes

	confidentiality, at the initiation of services?	
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report	yes

	required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate	yes

	with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?	
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of 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?	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 any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations 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).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial	yes

	evidence, including any available physical and DNA evidence and any available electronic monitoring data?	
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	

	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has	yes

	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?	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually 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?	yes
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who	yes

	have engaged in sexual abuse?	
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	

	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	

	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	yes
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes

115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph §	yes

	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.)	
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes
115.86 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	

	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports,	yes

	investigation files, and sexual abuse incident reviews?	
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant 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?	yes
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted	yes

	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?	
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	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	na

	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.)	
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes