

Prison Rape Elimination Act (PREA) Audit Report Adult Prisons & Jails

Interim Final

Date of Report May 31, 2018

Auditor Information

Name: Cynthia Malm	Email: cmalm@idahosherriffs.org
Company Name: Idaho Sheriffs' Association	
Mailing Address: 3100 Vista Ave., Ste. 203	City, State, Zip: Boise, Idaho 83705
Telephone: 208-346-1065	Date of Facility Visit: December 4 – 6, 2017

Agency Information

Name of Agency: Washington County Sheriff's Office		Governing Authority or Parent Agency (If Applicable): Washington County	
Physical Address: 262 E. Court St.		City, State, Zip: Weiser, ID 83672	
Mailing Address: Same		City, State, Zip: Click or tap here to enter text.	
Telephone: 208-414-2124		Is Agency accredited by any organization? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
The Agency Is:	<input type="checkbox"/> Military	<input type="checkbox"/> Private for Profit	<input type="checkbox"/> Private not for Profit
<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> County	<input type="checkbox"/> State	<input type="checkbox"/> Federal

Agency mission: The Mission of the Washington County Sheriff's Office is to:

- Prevent Crime
- Perform our statutory duties
- Uphold the Law fairly and firmly
- Protect help and reassure the Community
- Pursue and bring to Justice those who break the law
- Uphold the Constitution of the United States
- Do all of this with Integrity, common sense and sound Judgment

We must be compassionate, courteous and patient, acting without fear or favor of prejudice to the rights of others. We must be professional, calm and restrained in the face of violence and apply only that force which is necessary to accomplish our lawful duty. We shall strive to reduce the fears of the public, and so far as we can, to reflect their priorities in the actions we take. We must respond to well founded criticism with a willingness to change.

Agency Website with PREA Information: law.co.washington.id.us/sheriff/washington-county-jail/

Agency Chief Executive Officer

Name: Matt Thomas	Title: Sheriff
Email: wcsheriff@co.washington.id.us	Telephone: 208-414-2121

Agency-Wide PREA Coordinator

Name: Johnny Biddinger	Title: Deputy
Email: wc229@co.washington.id.us	Telephone: 208-414-2124
PREA Coordinator Reports to: Lt. Kelly Erickson	Number of Compliance Managers who report to the PREA Coordinator: 0

Facility Information

Name of Facility: Washington County Jail

Physical Address: 262 E. Court St., Weiser, ID 83672

Mailing Address (if different than above): Same

Telephone Number: 208-414-2124

The Facility Is:	<input type="checkbox"/> Military	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Private not for profit
<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> County	<input type="checkbox"/> State	<input type="checkbox"/> Federal
Facility Type:	<input checked="" type="checkbox"/> Jail	<input type="checkbox"/> Prison	

Facility Mission: The Washington County Jail is dedicated to serving and protecting the public.

Our mission is to provide a secure place to house adults accused or convicted of committing criminal acts and civil violations.

Through training, dedication, and professionalism we serve the needs of inmates, deputies, and the public.

Agency Website with PREA Information: law.co.washington.id.us/sheriff/washington-county-jail/

Warden/Superintendent

Name: Kelly Erickson	Title: Lieutenant/Jail Administrator
Email: wcjailcom@co.washington.id.us	Telephone: 208-414-2124

Facility PREA Compliance Manager

Name: N/A		Title: Click or tap here to enter text.	
Email: Click or tap here to enter text.		Telephone: Click or tap here to enter text.	
Facility Health Service Administrator			
Name: Sean Hackett		Title: PA	
Email: Click or tap here to enter text.		Telephone: 208-414-2124	
Facility Characteristics			
Designated Facility Capacity: 49		Current Population of Facility: 35	
Number of inmates admitted to facility during the past 12 months			549
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more:			295
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more:			253
Number of inmates on date of audit who were admitted to facility prior to August 20, 2012:			0
Age Range of Population:	Youthful Inmates Under 18: None	Adults: 18 - 73	
Are youthful inmates housed separately from the adult population?		<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Number of youthful inmates housed at this facility during the past 12 months:			0
Average length of stay or time under supervision:			15
Facility security level/inmate custody levels:			Minimum to Maximum
Number of staff currently employed by the facility who may have contact with inmates:			13
Number of staff hired by the facility during the past 12 months who may have contact with inmates:			3
Number of contracts in the past 12 months for services with contractors who may have contact with inmates:			0
Physical Plant			
Number of Buildings: 1		Number of Single Cell Housing Units: 1	
Number of Multiple Occupancy Cell Housing Units:		3	
Number of Open Bay/Dorm Housing Units:		3	
Number of Segregation Cells (Administrative and Disciplinary):		2	
Description of any video or electronic monitoring technology (including any relevant information about where cameras are placed, where the control room is, retention of video, etc.):			
<p>The facility has one camera in each Pod in the facility, Pods 100-500 have a camera at the main entry covering the day room. Pod 600 is a hallway with 2 individual cells and a shower, the camera is also at the main entry facing down the hall. There is a camera in the medical/suicide watch cell with an electronic screen covering the toilet area for privacy.</p>			

There are 2 hallway cameras covering the corridor, 2 cameras in the kitchen area where 3 inmate workers have access, 2 cameras in the rec area (1 inside & 1 outside). In the booking area there are 2 cameras, 1 with audio. There is a camera in the Intox room where they also hold video arraignments and breathalyzer, it also records audio. The Sally Port has 1 camera in it. The Control room is in the center of the jail inside a horseshoe pattern of all the housing pods.

Medical

Type of Medical Facility:	Clinic
Forensic sexual assault medical exams are conducted at:	St. Luke's Meridian Medical Center, Meridian, Idaho

Other

Number of volunteers and individual contractors, who may have contact with inmates, currently authorized to enter the facility:	13
Number of investigators the agency currently employs to investigate allegations of sexual abuse:	2 administrative; 1 criminal

Audit Findings

Audit Narrative

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-onsite audit, onsite audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

The Prison Rape Elimination Act (PREA) on-site audit of the Washington County Jail in Weiser, Idaho was conducted on December 4 - 6, 2017 by Cynthia Malm from Pocatello, Idaho, a U.S. Department of Justice Certified PREA auditor for adult facilities. Pre-audit preparation included a thorough review of all documentation and materials submitted by the facility on a flash drive along with the data included in the completed Pre-Audit Questionnaire. The auditor reviewed documentation that included agency policies and procedures, detention policies and procedures, forms, education materials, training curriculum, organizational charts, mission statements, checklists, posters, inmate handbooks, flyers, website information, and other PREA related materials that were provided to demonstrate compliance with the PREA standards. This review prompted a series of questions that were noted on the auditor's compliance tool and the auditor posed the questions to the PREA Coordinator at the on-site audit.

An entrance meeting was held with Deputy Johnny Biddinger, the PREA Coordinator, of the Washington County Jail and Deputy Kelly Nelsen who is training to become the PREA Coordinator in the Washington County Jail. Deputy Biddinger provided the auditor a list of all of the staff of the facility and their schedules, including specialized staff, and a list of all of the inmates in the facility and where they were housed. The auditor explained the process of the audit and answered any questions the agency had about the audit process.

During the three days of the on-site audit, the auditor was provided a private room within the Sheriff's Office from which to work and conduct confidential interviews of staff. The auditor was also provided a private room within the secure perimeter to conduct confidential interviews with inmates and additional staff. Formal personal interviews were conducted with facility staff, specialty staff, inmates, and contract employees. The auditor interviewed a total of ten inmates who were randomly selected from each of the six housing units in the jail. One of the inmates was non-English speaking and a deputy interpreted for the auditor. There were no youthful, transgender, intersex, or disabled inmates in the facility to interview. There were no inmates in segregated housing who had been a victim of sexual abuse for the auditor to interview. Inmates were interviewed using the recommended DOJ protocols that question their knowledge of a variety of PREA protections, generally and specifically, their knowledge of reporting mechanisms available to inmates to report abuse or harassment. All of the inmates interviewed acknowledged that they had received information on PREA at booking and received a PREA pamphlet that contained information on how to report a sexual assault or sexual harassment. Many stated they had not had any risk screening while in the facility. Most stated they had been shown a video explaining PREA while they have been incarcerated in the Washington County Jail. The auditor reviewed five risk assessments inmates had signed at booking. The majority of inmates expressed confidence in the staff of the Washington County Jail and said the deputies treat them with respect and would respond immediately and appropriately to any sexual abuse.

The auditor interviewed nine staff members representing two shifts (1st shift 5:00 a.m. to 5:00 p.m. and 2nd shift 5:00 p.m. to 5:00 a.m.). Nine staff members were all that were available for interviews. The auditor also interviewed nine specialty staff, including shift sergeants, medical provider (contract staff), food service (contract staff), incident review team, first responders, intake staff, and investigative staff. Nine staff were interviewed as random staff and, because all of the staff work many posts, some of them were also asked questions about intake, screening, searches, retaliation monitoring, and first responder duties. Also interviewed were the Undersheriff, Jail Administrator, and PREA Coordinator. Staff were interviewed using the DOJ protocols that question their PREA training and overall knowledge of the agency's zero tolerance policy, reporting mechanisms available to inmates and staff, the response protocols when an inmate alleges sexual abuse or sexual harassment, and first responder duties. There are no SAFE or SANE employees at the facility as they are made available at St. Luke's Meridian Medical Center in Meridian, Idaho. All staff were very knowledgeable about PREA and their responsibilities in preventing, detecting, and reporting sexual abuse and sexual harassment. All confirmed that they have extensive yearly training on those responsibilities. The auditor reviewed random staff training records, rosters for attendance at PREA training and the curriculum taught at the training to determine compliance with training mandates. The auditor also reviewed background check procedures for hiring. None of the staff who have been with the jail for five years have had background checks done. Case files for five inmates in the facility were reviewed in the booking room to evaluate screening and intake procedures, inmate education, and inmate signatures of acknowledgement.

Following the entrance meeting and some interviews, the auditor toured the facility from 9:30 a.m. – 11:00 a.m. and was escorted by Deputy Johnny Biddinger, PREA Coordinator and Deputy Kelly Nelsen, PREA Coordinator in Training. During the tour, the auditor reviewed the booking process, observed the facility configuration, camera and mirror placement throughout the facility, blind spots, staff placement for supervision of inmates, toilet and shower areas, notices posted throughout the building and documentation to assist in determining compliance with the standards. The auditor noted that shower areas allow inmates to shower separately and shower stalls have shower curtains or walls for privacy. Toilets have barriers allowing for privacy. The auditor reviewed the camera views on a monitor in Control and verified that toilets and showers were not monitored by the cameras. Notices of the PREA audit were posted throughout the facility in the dayrooms in both English and Spanish. Federal PREA notices were also posted. During the tour, the auditor was given privacy to talk informally to staff and inmates in the booking room, housing units, program areas, and work areas. The auditor interviewed two staff members working their posts to ask questions about their positions, procedures in their areas, and how their areas contributed to protection from sexual abuse and sexual harassment.

The auditor noted blind spots in Pods 200 and 400 where inmates or staff would be out of view from cameras or the hallway if they enter the blind spot area. The auditor also noted blind spots in the laundry area where there are no cameras and no easy view of people in two different parts of the laundry.

After the facility tour, the auditor reviewed questions noted on the auditor's compliance tool with Deputy Johnny Biddinger and reviewed additional documentation to verify compliance with the standards.

At the conclusion of the on-site visit, an exit meeting was held between the auditor, Deputy Biddinger and Deputy Larsen to discuss the audit findings and both discussed possible corrective actions that could be taken by the facility to achieve compliance with the standards that were not met.

Facility Characteristics

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate, resident or detainee population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

The Washington County Jail is operated and staffed by the Washington County Sheriff's Office. The Washington County Jail is an indirect facility with 49 beds in 6 pods. There are 3 open day room Pods, 2 Pods with 6 two bed cells that are locked down at night, and a medical/segregation Pod with 3 single bed cells. Female inmates are housed in one of the open day pods.

Washington County Jail is attached to the Sheriff's Office building and surrounds the Dispatch Center. The Washington County Sheriff's Office is located at 262 E. Court St. Weiser, Idaho. The Jail houses male and female adult inmates. New arrestees are brought in the Jail via a secure sally port. The arrestee is brought into the Booking Room and pat searched. The Booking Room consists of two holding cells, a storage room used for property and supplies, a shower room, and an Intox Room currently used for video arraignments with Magistrate Court and video control for the Pods. From the Booking Room, the Kitchen and Medical are down a short hall. The hallway in the opposite direction wraps around dispatch with access to housing units.

Pod 600 includes a medical/suicide watch cell and is accessed in the main corridor with a large window and is also monitored by video with the toilet area digitally blocked for privacy. Two single bed cells are down a hall with access to a shower which makes up the rest of Pod 600. Pod 500 consists of three bunk beds housing six inmates. The Pod has a bathroom outside the camera view with a shower curtain for privacy. Pod 500 is the inmate worker pod so it includes the library and extra clothes and supplies for the Jail.

A door in the corridor separates the four general housing pods. Indoor and outdoor recreation are just beyond the corridor door along with four pods. Pod 400 is a general population pod with four bunk beds housing eight inmates. Pod 400 is currently a female pod. However, when no females are in custody, it will become a male inmate pod. Pod 300 is a lockdown pod with six cells containing two beds each and houses up to twelve inmates. The inmates in the pod are locked down at night from 11:00 p.m. to 5:45 a.m. Any of these cells can be used as a lockdown cell for disciplinary actions. If a cell is used for an inmate on lockdown then only one inmate would be housed in the two-bed cell. Pod 200 is built and set up just like Pod 400 but is for male inmates. Pod 100 is identical to Pod 300. The laundry room and attorney visiting rooms are at the end of the corridor.

The Washington County Jail is monitored by a minimum of two detention staff at all times who are able to move throughout the Jail with a set of keys for all interior doors. All exterior Jail doors are controlled by Dispatch who is reachable by radio. Monitors for all jail cameras are in both Dispatch and the Booking Room. Dispatch is connected to the Jail by a single door that they have quick access to. The Washington County Sheriff's Office and the Weiser Police Department are in the same building and are able to respond quickly to any jail emergency.

Summary of Audit Findings

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, **along with a list of each of the standards in each category.** If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.

Auditor Note: No standard should be found to be “Not Applicable” or “NA”. A compliance determination must be made for each standard.

Number of Standards Exceeded: 3

115.17, 115.41, 115.42

Number of Standards Met: 42

115.11, 115.12, 115.13, 115.14, 115.15, 115.16, 115.18, 115.21, 115.22, 115.31, 115.32, 115.33, 115.34, 115.35, 115.43, 115.51, 115.52, 115.53, 115.54, 115.61, 115.62, 115.63, 115.64, 115.65, 115.66, 115.67, 115.68, 115.71, 115.72, 115.73, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.88, 115.89, 115.401, 115.403

Number of Standards Not Met: 0

Click or tap here to enter text.

Summary of Corrective Action (if any)

115.16(a) requires the agency to establish procedures to provide disabled inmates 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. The Washington County Jail policy states that it will provide inmate handbooks in large print editions to provide PREA information to inmates with low vision. But there is no information in the inmate handbooks about PREA or how to report a sexual harassment or abuse. The policy also states that the Washington County Jail will provide access to sign language help for those who are deaf. But, nothing is in place to provide sign language interpreters and no agreements have been made with interpreters. The Washington County Jail is planning on putting PREA information into the inmate handbook and will make it available in large print editions to those inmates with low vision. The Jail will also develop a plan on how to provide access to sign language interpreters to inmates who are deaf. The Washington County Jail will send a copy of the revised handbook and the developed procedures for obtaining sign language interpreters, when needed, to the auditor within 180 days of this interim report.

Corrected successfully on May 30, 2018

115.17(e) requires the facility to conduct criminal background records checks on all employees who have worked for the facility at least every five years. The Washington County Jail has this information in policy but has not done any five-year checks at the time of the audit. The Washington County Jail will complete a criminal background records check on all employees that have worked for the facility for at least five years. Confirmation of these checks being completed will be sent to the auditor within 180 days of the date of this interim report.

Corrected successfully on May 30, 2018

115.17(f) requires the facility to ask applicants and employees who may have contact with inmates directly about previous misconduct in either hiring applications, interview and hiring boards, or in self-evaluations. The Washington County Jail Policy states that it will do this but the question is not on the application and there is no process in place to ask the questions by other means. The Washington County Jail will amend its policy to specifically require when the question will be asked of applicants and current employees and will develop procedures to ask the question in hiring and promotion boards and in the yearly PREA training. The Washington County Jail will send the amended policy and documentation confirming procedures are in place to the auditor within 180 days of the date of this interim report.

Corrected successfully on May 30, 2018

115.18(b) requires that when considering technology, the facility consider how technology may enhance the agency's ability to protect inmates from sexual abuse? During the audit tour, the auditor noticed blind spots in Pod 200, Pod 400, and the laundry which were large enough for staff or inmates to enter into the area and not be seen from the hallway or the monitors in Control. The Washington County Jail will resolve the issues of the blind spots through policy direction, technology, mirror placement, or other means acceptable to the agency. Documentation of what is done to alleviate the blind spots will be sent to the auditor within 180 days of the date of this interim report.

Corrected successfully on May 30, 2018

115.21(d) states that if and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member. The Washington County Jail policy states that it will do this but there is nothing in place for this to happen. No one has been screened or approved for this. Rose Advocates is the rape crisis center that the Washington County Jail uses and they are a 24/7 service. The Washington County Jail will either amend the policy by deleting the section on making available an appropriate staff member from a community-based organization or an appropriate agency staff member to provide these services or keep the policy and locate one of these persons to have available, if needed. The Washington County Jail will send the amended policy to the auditor within 180 days of the date of this interim report. If the Jail chooses to keep this in policy, it will also send the auditor the qualifications of the person or agency that will do this for them.

Corrected successfully on May 30, 2018

115.22(b) requires that the information in 115.22(b) be published on the agency's website if it has one. The Washington County Sheriff's Office does have a website but the information is not published on it or anywhere else. The Washington County Sheriff's Office or Jail will put the information on the website and will send documentation confirming it on the website to the auditor within 180 days of the date of this interim report.

Corrected successfully on May 30, 2018

115.32 requires that all volunteers and contractors who have contact with inmates are trained on their responsibilities under the agency's policies and procedures regarding sexual abuse/harassment prevention, detection, and response and sign that they have received the training and understand it. Washington County Jail has a curriculum in place to train contract employees and volunteers but has not trained any of them. And, because there has been no detailed training, there is no documentation. The Washington County Jail will provide training to the contract employees and volunteers based on the services they provide and level of contact they have with inmates. When the training is completed, the contract employees and volunteers will sign that they have received the training and understand it and the Washington County Jail will maintain that documentation. The Washington County Jail will send the auditor documentation showing that the training has been given to all of the contract employees and volunteers and the signed documentation that they received the training and understand it. This documentation will be sent to the auditor within 180 days of the date of this interim report.

Corrected successfully on May 30, 2018

115.33 requires the facility to provide inmates PREA education at intake and comprehensive PREA education within 30 days of booking to all inmates including Limited English proficient and disabled inmates. It also requires that the facility maintain documentation of the inmates' participation in the comprehensive training. The Washington County Jail does not have any procedures in place for educating the deaf or those with psychiatric problems. The Jail also doesn't document the inmates' receiving of the comprehensive PREA education. The majority of inmates interviewed had not retained the information that has been given to them. The Washington County Jail will develop practices to provide PREA education to the deaf and those with psychiatric problems. The Jail will also provide more comprehensive training to all inmates to ensure they know all the avenues available to them to report a sexual abuse or sexual harassment and so they know what support services are available when sexually abused and how to contact those support services and will document the attendance of the inmates in these sessions. The Washington County Jail will send documentation of the developed practices and attendance records to the auditor within 160 days of the date of this interim report. Once the information is obtained, the auditor will arrange for interviews with random inmates to verify they are retaining the information so that the final report can be written within the proper timelines.

Corrected successfully on May 30, 2018

115.34 requires administrative and criminal investigators who investigate sexual abuse in the facility to take training for conducting sexual abuse investigations in a confinement setting. The criminal investigator in the Washington County Sheriff's Detective Division has had the required training. However, the two administrative investigators who work in the Jail have not had the training. The Washington County Jail will require the two administrative investigators take the NIC online course,

“Investigating Sexual Abuse in a Confinement Setting”. The Jail will send the auditor documentation that the two investigators have taken the course within 180 days of the date of this interim report.

Corrected successfully on May 30, 2018

115.35 (a and c) requires that the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The standard requires that documentation is maintained showing that medical and mental health practitioners have completed the specialized training and have also received the same training mandated for contractors in the facility. The Washington County Jail does not have a policy in place for this standard, does not maintain documentation, and has not provided the training required of other contractors on sexual abuse prevention and reporting. The Washington County Jail will develop a policy that explains what training will be required of medical and mental health practitioners who work regularly in the facility and will maintain documentation of the training provided. The Washington County Jail will also provide the same training to the medical provider as is provided to other contractors. The Jail will send the auditor the policy when it is developed, will provide the training to the medical provider, and will send the documentation that the medical provider has taken the training. This information will be sent to the auditor within 180 days of this interim report.

Corrected successfully on May 30, 2018

115.41 (b and f) requires an initial risk assessment done on all inmates within 72 hours of booking and a reassessment done within 30 days of booking. The Washington County Jail began doing the initial risk assessments within the month prior to the audit and not all of the inmates in the facility have had the assessment. And, because initial risk assessments started shortly before the audit, no reassessments have been done. The Washington County Jail will send the auditor verification that all inmates in the facility have had an initial risk assessment and that initial risk assessments are being done on all inmates within 72 hours of booking. And, the Jail will also send the auditor verification that reassessments are being done on all inmates within 30 days of booking who are still in the jail. This verification will be sent to the auditor within 180 days of this interim report but not sooner than 120 days to verify that completing initial risk assessments is now standard practice during the booking process and risk assessments within 30 days is now standard practice.

Corrected successfully on May 30, 2018

115.51 requires that facilities provide inmates with several ways to report, both inside and outside the facility, sexual abuse and sexual harassment and whether the ways to report outside the facility are free and unmonitored. The standard also requires the staff to be provided with a way to privately report the sexual abuse or sexual harassment of an inmate. The Washington County Jail has several ways in place for inmates to report sexual abuse and sexual harassment. However, the inmates have not been given detailed information on the ways to report or if outside calls are free and unmonitored. And, even though it is in policy for staff to be able to privately report, the majority of staff were unfamiliar with what the policy said. The Washington County Jail will send documentation to the auditor showing that the inmates have received comprehensive information and training on all the ways they can report a sexual abuse and sexual harassment and whether calls to outside reporting agencies are free of charge and unmonitored. The Jail will also send documentation that all of the staff have been trained as to the policy for privately reporting the sexual abuse or sexual harassment of an inmate. This documentation

will be sent to the auditor within 160 days of the date of this interim report. The auditor will then arrange for interviews of random inmates within the following 20 days to verify that the inmates know the information on how to report.

Corrected successfully on May 30, 2018

115.53 requires the facility to provide inmates access to outside victim advocates for emotional support services related to sexual abuse by giving the inmates contact information and enabling reasonable communication between inmates and the advocates. The standard also requires the facility to maintain an MOU with the agency or documentation of attempts to enter into the MOU. The Washington County Jail has a verbal agreement with Rose Advocates to provide this access but no information has been given to the inmates. And, an MOU is being worked on but was not completed by the date of the audit. The Washington County Jail will complete the MOU with Rose Advocates or document the reason why it cannot enter into one. And, the Jail will provide complete information and training to the inmates on the services Rose Advocates provides as well as their hotline contact number and explain whether the calls are free and unmonitored. The Washington County Jail will send a copy of the MOU and documentation showing that the detailed information and training has been given to the inmates to the auditor within 160 days of the date of this interim report. The auditor will then arrange for interviews of random inmates within 20 days of the receipt of the documentation to verify that the inmates know the information on what support services are available, how to contact the Rose Advocates hotline, and whether the call is free and unmonitored.

Corrected successfully on May 30, 2018

115.71(b) requires investigators who investigate sexual abuse allegations in the facility take specialized training for investigations in a confined setting. The criminal investigator has taken the specialized training but the two administrative investigators have not had the training. The Washington County Jail will require the two administrative investigators to take the NIC Online Course, "Investigating Sexual Abuse in a Confined Setting" and will send the documentation that the training has been completed to the auditor within 180 days of this interim report.

Corrected successfully on May 30, 2018

115.81 requires that all inmates receive an initial risk screening at booking and follow-up counseling is offered to victims of sexual abuse that occurred in another institution or in the community. The Washington County Jail began doing the initial risk assessments within the month prior to the audit and not all of the inmates in the facility have had the assessment. And, because initial risk assessments started shortly before the audit, no reassessments have been done. The Washington County Jail will send the auditor verification that all inmates in the facility have had an initial risk assessment and that initial risk assessments are being done on all inmates within 72 hours of booking. The jail will also send documentation to the auditor that inmates who disclose sexual victimization at booking are offered follow-up counseling. And, the Jail will also send the auditor verification that reassessments are being done on all inmates within 30 days of booking who are still in the jail. This verification will be sent to the auditor within 180 days of this interim report but not sooner than 120 days to verify that completing initial risk assessments is now standard practice during the booking process and risk assessments within 30 days is now standard practice.

Corrected successfully on May 30, 2018

PREVENTION PLANNING

Standard 115.11: Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

All Yes/No Questions Must Be Answered by The Auditor to Complete the Report

115.11 (a)

- Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? Yes No
- Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? Yes No

115.11 (b)

- Has the agency employed or designated an agency-wide PREA Coordinator? Yes No
- Is the PREA Coordinator position in the upper-level of the agency hierarchy? Yes No
- 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 No

115.11 (c)

- 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 No NA
- Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11(a) The Washington County Jail has implemented a zero-tolerance policy as detailed in Policy 15.1 which comprehensively outlines the agency's approach to preventing, detecting, and responding to all forms of sexual abuse and sexual harassment. The policy contains necessary definitions, sanctions, and descriptions of the agency strategies and responses to sexual abuse and harassment. This policy forms the foundation for the program's training efforts with inmates, staff, volunteers, contractors, and others. All interviews reflected that staff and inmates are aware of this zero-tolerance policy.

115.11(b) The facility has designated an upper-level, agency-wide PREA Coordinator, Deputy Johnny Biddinger, to oversee policy and procedure development and operations in reference to sexual abuse and sexual harassment. The PREA Coordinator reports directly to the Washington County Sheriff's Office Chief Deputy, Cody Strong, who, in turn, reports directly to the Washington County Sheriff, Matt Thomas. Deputy Biddinger indicated that he has sufficient time and authority to develop, implement, and oversee the agency's efforts toward PREA compliance and Sheriff Matt Thomas confirmed that Lt. Kelly Erickson, Jail Administrator and Deputy Johnny Biddinger, PREA Coordinator, have full support of the Sheriff's Office in all of their efforts to bring the Washington County Jail into compliance with the PREA standards.

115.11(c) The Washington County Sheriff's Office operates only one facility and, therefore, has not assigned a PREA Compliance Manager to the facility.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.1
Washington County Jail's Organizational Chart
Interview with Sheriff Matt Thomas
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger

Standard 115.12: Contracting with other entities for the confinement of inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.12 (a)

- If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) Yes No NA

115.12 (b)

- Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure 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 OR the response to 115.12(a)-1 is "NO".) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.12(a-b) The Washington County Jail does not contract with external facilities to house or confine any of its inmates and there haven't been any contracts of this type during the twelve months prior to the PREA audit. Therefore, this standard is not applicable to the Washington County Jail.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Lt. Kelly Erickson, Jail Administrator

Standard 115.13: Supervision and monitoring

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.13 (a)

- Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? Yes No
- Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the institution

programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring? Yes No NA

- Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring? Yes No

115.13 (b)

- In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)
 Yes No NA

115.13 (c)

- 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 No
- 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 No
- 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 No

115.13 (d)

- 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 No
- Is this policy and practice implemented for night shifts as well as day shifts? Yes No
- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.13(a) The Washington County Jail ensures that the facility develops, documents, and makes 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 average number of inmates incarcerated in the Washington County Jail during the twelve months prior to the audit was 35 and the staffing plan was predicated on the rated capacity of 39 inmates. Deputy Biddinger explained that the staffing plan requires a minimum of two detention staff on each shift. That number does not include a Control position as Control doubles as a Dispatch Center and Dispatchers work in the Control Room. The Washington County Jail has thirteen budgeted jail positions which includes the Jail Administrator. However, at the time of the audit, the jail was down three positions and there were only nine deputy positions filled.

In calculating adequate staffing levels and determining the need for video monitoring, the facility takes into consideration the eleven mandatory elements and considerations required by this PREA Standard:

- (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) Institution 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.

115.13(b) Deputy Biddinger explained that the jail never goes below the minimum of two deputies on shift so no deviations were documented. If a deputy cannot come in on the shift, one of the deputies from the previous shift must stay until the shift is covered and the cover deputy arrives to fill the position.

115.13(c) Policy 15.1 requires that the staffing plan is reviewed once a year to determine if it is still adequate to meet the needs of the Washington County Jail and protect inmates from sexual abuse. The staffing plan was created in November of 2016 by Sheriff Matt Thomas. At the time of the audit, it has been one year since the plan was created and Deputy Biddinger confirmed that a review is due and will be done by the end of the year. During the staffing plan review, the agency will consider whether the current staffing plan is adequate, what video monitoring systems are in place and if they are sufficient to detect sexual abuse and sexual harassment within the facility. The agency will also review resources available to the facility to ensure adherence with the staffing plan. The staffing plan shows 13 people are assigned to the Jail and that includes the Jail Administrator's position.

115.13(d) The Washington County Jail has detailed in Policy 15.1 the practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. A review of the documentation of unannounced supervisory rounds confirmed that the rounds are done randomly on all shifts. This was also verified through informal interviews with staff at their posts during the audit tour and through formal interviews with random staff and supervisors. Interviews also confirmed that the rounds are unannounced and staff are prohibited from alerting other staff that the rounds are taking place. The supervisors work in the Washington County Jail as one of the two deputies on shift and regularly do security checks. Therefore, the other staff member is not aware when one of the unannounced supervisor rounds is being done.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.1
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Idaho Jail Standards
Washington County Jail Staffing Plan
Memo signed by staff that there will always be two detention officers on shift and the senior officer will stay when someone calls in sick until the shift can be covered.
Documentation evidencing the conduct of unannounced supervisor rounds on every shift
Informal interviews with staff during the audit tour
Formal interviews with random staff and intermediate or higher-level staff
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.14: Youthful inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.14 (a)

- 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].) Yes No NA

115.14 (b)

- In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No 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].) Yes No NA

115.14 (c)

- 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].) Yes No 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].) Yes No 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].) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.14(a) The Washington County Jail has detailed in Policy 15.1 how a youthful inmate would be housed in the facility. During the 12 months prior to the audit, the Washington County Jail reported that it has not housed any youthful inmates. The Jail has kept the policies in place for the rare occasion that they may be required to house a youthful inmate in accordance with Idaho law. If a youthful inmate is placed in the Washington County Jail, the Jail will not place the inmate in a housing unit in which the 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. According to policy classification will identify the most appropriate housing unit for the youthful inmate and the housing assignment will be reviewed and approved by the Sheriff. Any changes to the housing assignment will be the responsibility of Classification in agreement with Sheriff.

115.14(b) Referring to Policy 15.1, the Washington County Jail will either maintain sight and sound separation between youthful inmates and adult inmates in areas outside of housing units or will provide direct supervision when youthful inmates and adult inmates have sight, sound, or physical contact.

115.14(c) The Washington County Jail has detailed in Policy 15.1 that the Jail will make its best efforts to avoid placing a youthful inmate in restrictive housing to comply with this standard. Classification will maintain documentation of youthful inmates who have been placed alone in restrictive housing in order to separate them from adult inmates and the reason(s) for housing them alone.

Absent exigent circumstances, the facility does not deny youthful inmates daily large-muscle exercise and any legally required special education services while in the facility. The Shift Supervisor will document the exigent circumstances of each instance in which youthful inmates' access to large muscle exercise, legally required education services, and other programs and work opportunities is denied. According to policy, the Jail Administrator will arrange for a tutor to come to the facility daily to assist the youthful inmate in getting an education. The policy also states that youthful inmates are given access to other programs and work opportunities to the extent possible.

The auditor is relying on the policy and interviews with Lt. Erickson and Deputy Biddinger to confirm this standard as there was no documentation to review since the Jail has not housed any youthful inmates in the 12 months prior to the audit.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.1
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator
Interviews with random staff
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger

Standard 115.15: Limits to cross-gender viewing and searches

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.15 (a)

- 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 No

115.15 (b)

- Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.) Yes No NA
- Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20, 2017.) Yes No NA

115.15 (c)

- Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches? Yes No
- Does the facility document all cross-gender pat-down searches of female inmates?
 Yes No

115.15 (d)

- Does the facility implement a policy and practice 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 No
- Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit? Yes No

115.15 (e)

- Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status? Yes No
- If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that

information as part of a broader medical examination conducted in private by a medical practitioner? Yes No

115.15 (f)

- Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? Yes No
- Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.15(a) The Washington County Jail Policy 15.1 details that cross gender strip searches are prohibited unless exigent circumstances exist or when performed by medical practitioners and the policy lists some examples of exigent circumstances. Only medical practitioners can perform intrusive or invasive body cavity searches under all circumstances. There were no cross-gender strip searches done in the 12 months prior to the audit for the auditor to review.

115.15(b) The Washington County Jail policy states that male staff are prohibited from conducting pat down searches of female inmates except in exigent circumstances. The Washington County Jail reported that there have been no cross-gender pat down searches of a female inmate during the twelve months prior to the audit. Interviews with female inmates confirmed that female deputies conduct all pat down searches of female inmates and the facility does not restrict female inmate's programming or other out-of-cell activities when a female deputy is not available to conduct a pat down search.

115.15(c) The Washington County Jail requires that all cross-gender strip searches of male and female inmates and all cross-gender pat down searches of female inmates must be documented and explain the exigent circumstances that required the search. No searches of this type were done prior to the audit.

115.15(d) The Washington County Jail policy and practice ensures that inmates are able to shower, perform bodily functions, and change clothing with privacy. Policy and practice require announcement when staff of the opposite gender enter the housing unit and the shower/toilet areas. The auditor observed staff conducting rounds in cross gender housing units and announcing their presence entering the units. Interviews with inmates and staff confirm this is policy and actual practice of the policy on a consistent basis. All of the interviews with inmates, both male and female, confirmed that they are given a great deal of privacy by the jail staff.

115.15(e) Washington County Jail policy and practice prohibit searching or physically examining a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. Interviews with staff confirmed they knew the policy and no searches of this type have been done.

115.15(f) The Washington County Jail has provided training to 100% of the staff regarding how to conduct cross gender pat down searches and searches of transgender and intersex inmates in a professional manner. Training for all of the staff has been done at the Idaho P.O.S.T Basic Detention Academy. Interviews with staff indicated that they all were aware of how to physically conduct the searches and the importance of being professional during the searches. Policy requires that transgender and intersex inmates are allowed to designate their search preference and their requests are honored.

There were no transgender or intersex inmates in the facility at the time of the audit.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail's Policy 15.1
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator
Interviews with random inmates and staff
P.O.S.T. PREA training curriculum

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

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.16 (a)

- 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 No

- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing? Yes No
- 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 No
- 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 No
- 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 No
- 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 No

115.16 (b)

- Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient? Yes No
- Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? Yes No

115.16 (c)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.16(a) The Washington County Jail's Policy 15.1 ensures 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. Policy states that a staff member will read the information on reporting and responding to sexual abuse or sexual harassment to inmates who have low vision or who are blind. The policy states that the inmate handbook is available in large print to help those with low vision. But, the handbook has no PREA information in it. Therefore, the policy does not match the practice and the auditor finds that the Washington County Jail does not meet this part of the standard.

The policy also states that the Washington County Jail will communicate with deaf or hard of hearing inmates by giving them access to sign language services. However, there is nothing in place to ensure that this will be achieved. There is no agreement with sign language interpreters and no plan is in place

to access sign language interpreters. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

The Washington County Jail reports that it will locate someone who can effectively communicate with inmates with psychiatric, intellectual or speech disabilities such as a Mental Health practitioner. All staff receive yearly training on PREA compliant practices for inmates with disabilities and inmates with limited English proficiency at the Idaho P.O.S.T. Basic Detention Academy and in their annual PREA training. There were no inmates with disabilities that would limit their ability to understand the procedures for reporting sexual abuse or sexual harassment in the facility at the time of the audit.

115.16(b) The Washington County Jail has established procedures to provide inmates with limited English proficiency 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. Pamphlets explaining the inmate's right to be free from sexual abuse and sexual harassment are available in a Spanish version. Posters in both English and Spanish are hung on the wall of the housing unit and explain how to report a sexual abuse or sexual harassment. The informational video on PREA is in both English and Spanish. The agency also has an agreement with a language line that provides immediate translation services via the telephone. All detention staff have access to the language line and the instructions for its use. There are also detention deputies who speak fluent Spanish and do a lot of interpretation as well as PREA training to the inmates who are limited English proficient. There were three limited English proficient inmates in the facility at the time of the audit and the auditor interviewed one of them with the help of a staff interpreter. The inmate was able to tell the auditor about the zero-tolerance policy for sexual abuse and sexual harassment and knew how to report an incident.

115.16(c) Washington County Jail Policy 15.1 prohibits the facility from using inmate interpreters, readers, or other inmate assistants except in limited circumstances where safety could be compromised waiting for other assistance. The Jail reports that there have been no instances in the past twelve months where inmate interpreters have been used. Interviews with random staff confirmed that inmate interpreters are not used unless there are exigent circumstances and no one could remember a time that inmate interpreters were used.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.1
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Deputy Johnny Biddinger
Interviews with random facility staff
Interview with one limited English proficient inmate
Samples of PREA posters and pamphlets translated into Spanish
Agreement with Language Line
Yearly PREA training curriculum for staff

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should put PREA information into the inmate handbook to explain how to report a sexual harassment or sexual abuse. The inmate handbook should be available in large print editions for those who are blind or have low vision.

2. The Washington County Jail should enter into MOUs or contracts with sign language interpreters to translate the facility's information on zero tolerance for sexual abuse and sexual harassment and how to report such incidences to the deaf.

Documentation confirming implemented practices and agreements should be sent to the auditor within 180 days of the date of the interim report so that a final report can be issued after the 180-day corrective action period has ended.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has added comprehensive PREA information to its handbook which covers the inmate's right to be free from sexual abuse and sexual harassment, how to report, contact information for Rose Advocates, and the inmate's right to be free from retaliation for reporting an incident
2. The Washington County Jail has created new PREA handouts that are posted in each housing unit and the Jail sent the auditor a copy of the new handout as well as a large print edition of the handout that is available to inmates who are blind or have low vision.
3. The Washington County Jail has an MOU with a language line service to provide translation services to limited English proficient inmates and to the deaf or hard of hearing. The sign language Video Interpreter is available through an app on a tablet with camera and screen for the inmate to use.

The auditor has reviewed all of the documents that were sent and the Washington County Jail is now fully compliant with this standard.

Standard 115.17: Hiring and promotion decisions

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.17 (a)

- 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 No
- 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 No

- 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 question immediately above? Yes No
- 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 No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? Yes No
- 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 question immediately above? Yes No

115.17 (b)

- Does the agency 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? Yes No

115.17 (c)

- Before hiring new employees, who may have contact with inmates, does the agency: perform a criminal background records check? Yes No
- 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 No

115.17 (d)

- Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates? Yes No

115.17 (e)

- 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 No

115.17 (f)

- 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 No
- Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees? Yes No
- Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? Yes No

115.17 (g)

- Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination? Yes No

115.17 (h)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.17(a) Washington County Jail Policy 15.1 prohibits the hiring, promotion or retention of any employee who may have contact with inmates and will not enlist the services of any contractor that has the prohibited conduct specified in this standard. The background investigation also includes a criminal

backgrounds check of all applicants for employment or contracting services. In addition to policy, detention deputies are required to be state certified within one year of hire and the Idaho P.O.S.T. Academy requires a thorough background check on any detention employee who will be attending the P.O.S.T Academy.

115.17(b) The Washington County Sheriff's Office considers 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.

115.17(c) In addition to conducting criminal background checks prior to hiring an applicant, the Washington County Sheriff's Office contacts all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegations of sexual abuse. In the past 12 months, three people have been hired who have contact with inmates and all of them have had extensive background and criminal history checks completed prior to their hiring.

115.17(d) Washington County Jail Policy 15.1 requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with inmates. In the past twelve months, the Washington County Sheriff's Office has not hired any contractors who have contact with inmates.

115.17(e) Washington County Jail Policy 15.1 requires a criminal background records check on all employees at least every five years. However, no criminal background checks on current employees have been done prior to the audit. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.17(f) The Washington County Jail Policy 15.1 states that it asks all applicants on the written application for hiring, hiring interview boards, promotion boards, and in the yearly PREA training about any instances of sexual harassment and sexual abuse. However, a review of the application for hire revealed that the question is not on the application. And, an interview with Deputy Biddinger disclosed that there is nothing specific in the procedures for hiring or promotion interview boards. And, the staff have not been asked to disclose the information in the yearly PREA training. Therefore, the auditor finds that the practice does not match the policy and the Washington County Jail does not meet this part of the standard.

Per policy, employees have a continuing affirmative duty to disclose any misconduct.

115.17(g) The Washington County Jail Policy 15.1 states that material omissions regarding such misconduct or provision of materially false information shall be grounds for termination.

115.17(h) Policy requires the Washington County Sheriff's Office to 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. The Washington County Sheriff's Office does require that the requesting agency provide a signed release of information from the applicant before giving the agency the requested information.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail's Policy 15.1

Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger

Interview with Deputy Johnny Biddinger, PREA Coordinator
Idaho P.O.S.T. IDAPA Rules
Idaho Jail Standards
Washington County Sheriff's Office Hiring Application

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should conduct a criminal background records checks on all employees that have worked for the jail for at least five years.
2. The Washington County Jail should amend the policy to identify specifically when to ask all applicants and employees who may have contact with inmates directly about previous sexual misconduct.
3. The Washington County Jail should put into practice the amended policy on reporting sexual misconduct.

Documentation confirming implemented policy and practices should be sent to the auditor within 180 days of the date of the interim report so that a final report can be issued after the 180-day corrective action period has ended.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. Washington County Sheriff Matt Thomas has put into place a policy to conduct criminal background records checks on all employees of the Washington County Sheriff's Office annually. The first of these criminal backgrounds checks were done in January of 2018 and the Washington County Jail sent the auditor the list of all of the detention officers and verification that they have had a criminal background check this year. The new policy is that the background checks will be done in January every year.
2. The Washington County Jail has amended its PREA policy to require the agency to ask all applicants and employees who have contact with inmates directly about any sexual misconduct in the application questionnaire, interviews for promotions, and at the yearly PREA training.
3. The Washington County Jail has added to its hiring process a questionnaire that must be filled out that asks about any sexual abuse or sexual harassment the applicant has been involved in or disciplined for in prior jobs.
4. The Washington County Jail will ask each employee at promotion boards to report any incident of sexual misconduct he or she has been involved in.
5. The Washington County Jail will ask each employee at the yearly training to disclose any incident of sexual misconduct he or she has been involved in.

The auditor has reviewed all of the documents that were sent and the Washington County Jail is now fully compliant with this standard and exceeds this standard because of criminal background checks being done on all employees of the Sheriff's Office and being done annually instead of every five years.

Standard 115.18: Upgrades to facilities and technologies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.18 (a)

- 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.)
 Yes No NA

115.18 (b)

- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)
 Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.18(a) The Washington County Sheriff's Office and Washington County Jail haven't had any acquisitions of new facilities or substantial expansions or modifications of the current Jail since August 20, 2015.

115.18(b) The Washington County Jail has both internal and external video camera monitoring. Cameras are positioned on all external entrances and exits from the building. Cameras internally are located in hallways, dayrooms, cells, holding cells, support services areas, and internal entrances into

the building. There are no camera views of the toilets and shower areas. Along with existing cameras, five new cameras were installed to cover blind spots. The additional cameras include two new cameras in the jail hallway, one in the intox room, one in the booking room, and one in the kitchen.

The auditor noted blind spots in Pods 200 and 400 where inmates or staff cannot be seen. The auditor also noted two blind spots in the laundry where inmates or staff cannot be seen by camera or from the hallway. The blind spots could be a potential danger to staff or inmates and should be considered for correction. Therefore, the auditor finds that the Washington County Sheriff's Office does not meet this part of the standard.

Sheriff Matt Thomas stated that when planning any new design or electronic monitoring, every decision is centered around PREA. He has the ability to monitor the jail from his computer for safety of the staff and inmates. He also pays attention to blind spots and works to eliminate them. The agency has been working on adding new cameras as needed and the budget allows.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Washington County Jail written description of camera placement throughout the facility
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Sheriff Matt Thomas
Interview with Deputy Johnny Biddinger, PREA Coordinator

CORRECTIVE ACTION REQUIRED:

1. The Washington County Sheriff's Office should work together to develop a plan to fix the blind spots in 200, 400, and the laundry. The plan could include any number of fixes such as writing policy direction, adding cameras, adding mirrors, or by any other means acceptable to the agency and the budget.

Documentation on what is done should be sent to the auditor within 180 days of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On April 25, 2018, the auditor conducted an Idaho Sheriffs' Association annual jail inspection of the Washington County Jail and was shown this standard has been corrected as follows:

1. The Washington County Jail has installed three new cameras to cover Pods 200, 400, and the laundry room. The auditor verified that the cameras have eliminated the blind spots in those areas.

The auditor has reviewed the view of the new cameras and the Washington County Jail is now fully compliant with this standard.

RESPONSIVE PLANNING

Standard 115.21: Evidence protocol and forensic medical examinations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.21 (a)

- If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)
 Yes No NA

115.21 (b)

- Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA
- Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA

115.21 (c)

- 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 No
- Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? Yes No
- 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 No
- Has the agency documented its efforts to provide SAFEs or SANEs? Yes No

115.21 (d)

- Does the agency attempt to make available to the victim a victim advocate from a rape crisis center? Yes No
- 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? Yes No
- Has the agency documented its efforts to secure services from rape crisis centers? Yes No

115.21 (e)

- 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 No
- As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals? Yes No

115.21 (f)

- If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.) Yes No NA

115.21 (g)

- Auditor is not required to audit this provision.

115.21 (h)

- 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 attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.] Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.21(a - b) The Washington County Sheriff's Office and Jail follow the Idaho Policing Policy protocol that contains details for obtaining physical evidence for administrative and criminal investigations of sexual abuse. This protocol is used by the Washington County Detective Division when conducting criminal investigations inside and outside the detention facility. The protocol is developmentally appropriate for youth but no youthful inmates are held in the facility. Washington County Jail will take its sexual assault victims to St. Luke's Meridian Medical Center in Meridian, Idaho for a forensic exam, when needed, and they have a protocol for collecting evidence from the forensic exam.

115.21(c) Washington County Jail Policy 15.2 states that all victims of sexual abuse are offered access to forensic medical examinations where evidentiary or medically appropriate. There is no financial cost to the victim. The facility they take them to is St. Luke's Meridian Medical Center in Meridian, Idaho. When possible, examinations are performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). When SANEs or SAFEs are not available, a qualified medical practitioner performs a forensic medical examination. Attempts to get a SAFE or SANE are documented. This information is based on the policy as there were no forensic medical examinations performed during the last twelve months.

115.21(d) The Washington County Jail has an agreement with Rose Advocates located in Weiser, Idaho to provide rape crisis services and counseling to victims of sexual assault. A phone interview with Rose Advocates confirmed that they have agreed to be advocates and support services to the Washington County Jail for inmates who have been sexually abused and are working on an MOU with the Jail. Rose Advocates have a 24/7 hotline that inmates can call and it is a bilingual hotline. The advocate stated that they offer counseling, support services, safety planning and will accompany the victim to any court hearings. They are not an actual reporting line but will report the incident if the inmate requests it or if life is in danger. Inmates are informed up front about the limitations of their duty to report. The contact information for Rose Advocates is posted in the housing unit.

Washington County Jail Policy 15.2 states that "if a rape crisis center is not available to provide victim advocate services, the Jail will make available an appropriate staff member from a community-based organization or an appropriate agency staff member to provide these services. The agency will document the efforts made to secure these services. An appropriate agency staff member or an appropriate community-based staff member shall be an individual who has been screened to serve in this role and has received education concerning sexual assault and forensic examination issues in general. If an agency staff member is used, the Jail will maintain documentation on the staff member's qualifications to provide victim advocate services." However, there is nothing in place to provide this service to the inmates and no one has been screened to serve in this role. Therefore, the auditor finds that the Washington County Jail does not meet this standard.

115.21(e) The Washington County Jail Policy 15.2 ensures that a victim's advocate, upon request from the inmate, accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information and referrals as

warranted. Rose Advocates will also provide on-site mental health counseling, when needed, and the mental health counselor will be trained in the trauma of sexual assault and have skills to assist the sexual assault survivor in healing from the trauma of the assault. The request for an advocate to accompany the inmate to the Medical Center is on the sexual assault incident checklist for whoever takes the inmate to the hospital and the inmate will be asked if he or she would like an advocate to be with them through the exam. There have been no forensic medical examinations done during the last twelve months and a victim's advocate has not been requested or used by inmates.

115.21(f) The Washington County Jail has two investigators who work inside the Jail to conduct administrative investigations. If the administrative investigation appears to involve criminal elements, the team will refer the investigation to the Washington County Detective Division. All investigations that allegedly involve staff, or may have some conflict of interest, are referred outside the agency to another law enforcement agency. An interview with the PREA Coordinator indicated that the agency would seek assistance from the Payette County Sheriff's Office which has trained PREA investigators. The criminal investigator assigned to conduct sexual abuse investigations in the jail has had the specialized training for investigators in a confinement center and has had training on sexual assault investigations. The two administrative investigators in the Jail have not yet had the training. All PREA complaints are investigated for possible criminal activity and the Washington County Sheriff's Office maintains a close working relationship with the County Prosecutor. Once the criminal investigation is concluded by either the Detective Division or an outside agency, the case will be referred back to the Washington County Jail for further administrative investigation, (excluding internal investigations of staff) and disciplinary sanctions, if warranted.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.2
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator
Interviews with Washington County Sheriff's Office administrative and criminal investigators
Interview with Rose Advocates
Idaho Policing Policy
Training record for the criminal investigator within the agency

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should either amend the policy by deleting the section on making available an appropriate staff member from a community-based organization or an appropriate agency staff member to provide these services or keep the policy and locate one of these persons to have available.

Documentation confirming correct policy and practices should be sent to the auditor within 180 days of the date of the interim report so that a final report can be issued after the 180-day corrective action period has ended.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has amended its PREA policy by deleting the section on making available an appropriate staff member from a community-based organization or an appropriate agency staff member to provide these services.

The auditor has reviewed all of the documents that were sent and the Washington County Jail is now fully compliant with this standard.

Standard 115.22: Policies to ensure referrals of allegations for investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.22 (a)

- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse? Yes No
- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment? Yes No

115.22 (b)

- Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? Yes No
- Has the agency published such policy on its website or, if it does not have one, made the policy available through other means? Yes No
- Does the agency document all such referrals? Yes No

115.22 (c)

- If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? [N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).] Yes No NA

115.22 (d)

- Auditor is not required to audit this provision.

115.22 (e)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.22(a) The Washington County Jail has two investigators who work inside the Jail to conduct administrative investigations. If the administrative investigation appears to involve criminal elements, the Jail Administrator will notify the Sheriff's Office administration who will refer the investigation to the Washington County Detective Division. The detective assigned to conduct sexual abuse investigations in the Jail has had the specialized training for investigators in a confinement center and has had training on sexual assault investigations. All PREA complaints are investigated for possible criminal activity and the Washington County Sheriff's Office maintains a close working relationship with the County Prosecutor. Once the criminal investigation is concluded by either the Detective Division or an outside agency, the case will be referred back to the Washington County Jail for further administrative investigation, (excluding internal investigations of staff) and disciplinary sanctions, if warranted. Documentation showed that one allegation of sexual harassment was investigated as an administrative investigation and the investigation was completed. The allegation was inmate-on-inmate sexual harassment and it was unfounded. The Washington County Jail reported that no allegations of sexual abuse were received in the twelve months prior to the audit. Agency policy regarding the referral of allegations of sexual abuse and sexual harassment are published on the agency's website.

115.22(b) The agency has 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 potential criminal activity. The Sheriff will decide when the investigation will be handled by investigators of his agency or if the investigation should be referred to an outside agency. All investigations that allegedly involve staff are referred outside the agency to another law enforcement agency. All referrals will be documented.

The standard requires that the information in 115.22(b) be published on the agency's website if it has one. The Washington County Sheriff's Office does have a website but the information is not published on it or anywhere else. Therefore, the auditor finds that the Washington County Sheriff's Office does not meet this part of the standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.2
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Washington County Sheriff's Office website: law.co.washington.id.us/sheriff
Interview with Sheriff Matt Thomas
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator
Interviews with Washington County Sheriff's administrative investigator and criminal investigator
PREA Investigator training record for Washington County criminal investigator
Documentation of sexual harassment allegation and subsequent investigation

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should add the information in 15.22(b) to the Washington County Sheriff's Office website.

Documentation confirming the information is on the website should be sent to the auditor within 180 days of the date of the interim report so that a final report can be issued after the 180-day corrective action period has ended.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has added the information in 15.22(b) to the Washington County Sheriff's Office website.

The auditor has reviewed all of the documents that were sent and the Washington County Sheriff's Office website and the Washington County Jail is now fully compliant with this standard.

TRAINING AND EDUCATION

Standard 115.31: Employee training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.31 (a)

- Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? Yes No
- 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 No
- 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 No
- 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 No
- Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? Yes No
- Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? Yes No
- 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 No
- Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? Yes No
- Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates? Yes No
- Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities? Yes No

115.31 (b)

- Is such training tailored to the gender of the inmates at the employee's facility? Yes No

- 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 No

115.31 (c)

- Have all current employees who may have contact with inmates received such training?
 Yes No
- 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 No
- 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 No

115.31 (d)

- Does the agency document, through employee signature or electronic verification, that employees understand the training they have received? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.31(a) Washington County Jail Policy 15.3 requires that employees receive PREA training every two years. The training is provided yearly through the Idaho Sheriff's Association and it changes year to year. However, the training covers the ten required topics. The staff also have update training on PREA policies and procedures and changes that have occurred each year. Interviews with random staff revealed that the staff have extensive training on PREA and are very knowledgeable on the topics.

115.31(b) The training is tailored to the gender of the inmates at the Washington County Jail which houses both female and male inmates. There is only one facility so all employees are trained to work with both genders and there are no reassignments to care for one gender or the other.

115.31(c) The full PREA training is provided to employees every two years and refresher information is given during the years that the full PREA refresher training is not given. The FTO training program for new hires also has PREA training in it.

115.31(d) Documentation confirmed through employee signatures that 100% have received this yearly training and that the employees understand the training they received. Interviews of random staff also reflected that all have frequent training in PREA standards and practices.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

- Washington County Jail Policy 15.3
- Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
- PREA Training Curriculum
- Staff rosters and description of training received through ISA
- PREA Acknowledgement form for employees
- Interview with Deputy Johnny Biddinger, PREA Coordinator
- Interviews with random staff

Standard 115.32: Volunteer and contractor training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.32 (a)

- 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 No

115.32 (b)

- Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)? Yes No

115.32 (c)

- Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.32(a) Washington County Jail Policy 15.3 requires all volunteers and contractors who may have contact with inmates be trained on PREA requirements. The training curriculum includes a very comprehensive power point presentation that covers all the required topics and their responsibilities under the PREA requirements. The Washington County Jail reported that it has the curriculum ready to go but has not trained any of the volunteers or contractors as of the date of the audit. This totals 0 % that have been trained. Interviews with contract employees confirmed that there hasn't been any detailed training on PREA from Washington County Jail. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.32 The training curriculum was very detailed and showed that contractors and volunteers have extensive training on the zero-tolerance policy, duty to report, warning signs, proper communication with all inmates, first responder duties, and several other aspects of the prevention, detection, and response policies and procedures when they are given the training. All volunteers and contractors are supposed to receive the comprehensive training regardless of the level of services or contact with inmates. The curriculum is in place but none of the volunteers or contractors have had the training. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.32 Washington County Jail Policy 15.3 states that all volunteers and contractors are required to sign that they have received the training and understand it and the facility maintains that documentation. However, no training has been done and there is no documentation for the auditor to review. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.3
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
PREA Training curriculum and materials for volunteer and contractors
PREA Acknowledgement Form for volunteers and contractors
Interview with Deputy Johnny Biddinger, PREA Coordinator
Interviews with contract employees

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should provide PREA training to all volunteers and contractors who work directly with inmates.
2. When the training is provided to the contract employees and volunteers, the Washington County Jail should have them sign that they have received the training and understand it.
3. The Washington County Jail should maintain the documentation signed by the contract employees and the volunteers.

Documentation confirming the training has been completed and the volunteers and contract employees have acknowledged the receipt of the training and the understanding of the training should be sent to the auditor within 180 days of the date of the interim report so that a final report can be issued after the 180-day corrective action period has ended.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has provided training and a test that has been given to the contract Medical Provider, kitchen staff, and church volunteers. As of May 9, 2018, no volunteer or contractor is allowed into the facility who has not had the training.
2. The Washington County Jail requires the contractors and volunteers to sign that they have received the training and that they understand the training. The signature page describes the training they received.
3. The Washington County Jail maintains the documentation signed by the contract employees and the volunteers and submitted examples to the auditor for review.

The auditor has reviewed all of the documents that were sent and the Washington County Jail is now fully compliant with this standard.

Standard 115.33: Inmate education

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.33 (a)

- During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment? Yes No
- During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment? Yes No

115.33 (b)

- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment? Yes No
- 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 No
- 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 No

115.33 (c)

- Have all inmates received such education? Yes No
- 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 No

115.33 (d)

- Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who are deaf? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills? Yes No

115.33 (e)

- Does the agency maintain documentation of inmate participation in these education sessions?
 Yes No

115.33 (f)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.33(a - c) The Washington County Jail reports that 549 inmates have been admitted in the past twelve months to the facility and all have been provided with comprehensive information during the intake and booking process. All inmates in the Washington County Jail receive information at intake and a deputy explains the zero-tolerance policy, and explains how to report a sexual abuse or sexual harassment. The pamphlet is available in either English or Spanish. The inmate signs that he or she has received this information. Within 30 days of booking, inmates are shown an orientation video that explains the rules and operations of the Jail and explains the inmate's right to be free from sexual abuse and sexual harassment, the zero-tolerance policy, methods to report sexual abuse and sexual harassment, what to do if sexually abused or sexually harassed, and their right to be free from retaliation for reporting sexual abuse or sexual harassment. The video is shown every two weeks to the inmates, rotating between the English and Spanish version. Interviews with inmates confirmed that a video is shown to them in their language at least every 30 days.

115.33(d) The Washington County Jail ensures that key information is continuously available to inmates through posters and flyers. PREA posters are displayed in the dayrooms with the abuse hotline number by the phones. Posters and pamphlets are displayed in English and Spanish. The facility provides translation services for all PREA educational materials for inmates who are limited English proficient. The Washington County Jail policy states that it will provide the education to inmates with disabilities but there was nothing in place at the time of the audit other than the deputy reading the material to the illiterate or the blind or low vision. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.33(e) The Washington County Jail does not maintain any documentation of the inmates viewing the PREA video or of any other comprehensive PREA education given to them. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

Interviews with random inmates revealed that the inmates are not retaining the information they are provided through the video, posters and flyers. All of the interviews with inmates confirmed that they received information on PREA during booking in a PREA pamphlet that contained information on how to report a sexual assault or sexual harassment. All stated that information is posted on the wall of the housing unit. All knew they could access a hotline number on the phone. However, most of the inmates were unable to explain to the auditor all the ways to report a sexual abuse or sexual harassment incident. Most were uncertain whether there was a way to report an incident outside the facility. Some of the inmates knew there were support services available for sexual abuse but were not sure what services were or how to access them.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.3
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
PREA pamphlets displayed in dayrooms
PREA Posters displayed in dayrooms
Interviews with random inmates
Interviews with facility intake staff

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should develop specific procedures for educating inmates in PREA who are deaf or who have psychiatric problems.
2. The Washington County Jail should provide more comprehensive training to all inmates to ensure they know all the avenues available to them to report a sexual abuse or sexual harassment.
3. The Washington County Jail should provide more comprehensive training to all inmates to ensure they know what support services are available when sexually abused and how to contact those support services.
4. The Washington County Jail should maintain documentation of providing the video to the inmates and of any other comprehensive education given to the inmates.

Documentation showing that a procedure is in place to educate disabled inmates and provide more comprehensive training to all inmates should be sent to the auditor within 160 days of the date of this interim report. Documentation of attendance of the comprehensive training should also be sent. The auditor will then make arrangements to interview random inmates within the following twenty days to verify that they know how to report a sexual abuse and sexual harassment and that they know what support services are available to them if they become a victim of sexual assault.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has an MOU with a language line service to provide translation services to limited English proficient inmates and to the deaf or hard of hearing. The sign language Video Interpreter is available through an app on a tablet with camera and screen for the inmate to use.
2. The Washington County Jail rescreens inmates within 30 days of intake and provides a comprehensive education session along with showing the PREA video. At the end of the session, both the inmate and the deputy who provided the education sign the screening sheet.
3. All inmates are shown the PREA video once a week.
4. Flyers and the inmate handbook have been revised to include detailed information about contacting Rose Advocates and explain that the calls are free and unmonitored.
5. The Washington County Jail maintains the documentation of providing the video to the inmates and of any other comprehensive education given to the inmates.
6. The auditor conducted telephone interviews of five random inmates on May 30, 2018. The inmates were selected randomly from the 37 inmates incarcerated at the time of the telephone interviews. The inmates were able to successfully answer all of the questions the auditor had about reporting incidences of sexual abuse and sexual harassment inside the facility or to outside resources and the availability of advocates for emotional support. They were also able to explain to the auditor that the calls to the advocates are free and unmonitored.

The auditor has reviewed all of the documents that were sent and the telephone interviews with inmates and the Washington County Jail is now fully compliant with this standard.

Standard 115.34: Specialized training: Investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.34 (a)

- 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 have received 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 No NA

115.34 (b)

- Does this specialized training include techniques for interviewing sexual abuse victims? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] Yes No NA

- 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 No NA
- 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 No NA
- 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 No NA

115.34 (c)

- 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 No NA

115.34 (d)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.34(a) The Washington County Jail Policy 15.3 requires that all of its employees who investigate sexual abuse and sexual harassment allegations in the facility receive the specialized training for conducting such investigations in confinement settings. The investigators are required to take the on line PREA Investigators course, "Investigating Sexual Abuse in a Confinement Setting" available through the PREA Resource Center and the National Institute of Corrections or the classroom course when it is available. However, the detective who conducts criminal investigations in the jail of sexual abuse

allegations is the only investigator who has taken the course. The two administrative investigators have not taken the course. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.34(b) Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Detectives from the Washington County Sheriff's Detective Division have also had additional training in sexual abuse investigations for their job requirements and are very familiar with the proper use of Miranda and Garrity warning as they use them frequently in their job duties.

115.34(c) The auditor reviewed the training record for the investigator who took the investigator's specialized training. The detective took the classroom course in Boise, Idaho a few years before the audit.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.3
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Objectives for the online course, "Investigating Sexual Abuse in a Confinement Setting"
Training documentation for investigators completing the specialized training
Interviews with facility investigators
Interview with Deputy Johnny Biddinger, PREA Coordinator

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should require the two administrative investigators in the jail to take the course, "Investigating Sexual Abuse in a Confinement Setting".

Documentation of both investigators completing the course should be sent to the auditor within 180 days of the date of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Sheriff's Office sent two administrative investigators and one criminal investigator to attend the course, "Investigating Sexual Abuse in a Confinement Setting" in Las Vegas, Nevada on March 26, 2018. Certificates of Completion were sent to the auditor and are being kept on file at the Washington County Sheriff's Office.

The auditor has reviewed all of the documents that were sent and the Washington County Jail is now fully compliant with this standard.

Standard 115.35: Specialized training: Medical and mental health care

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.35 (a)

- 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? Yes No
- 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? Yes No
- 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? Yes No
- 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? Yes No

115.35 (b)

- If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.) Yes No NA

115.35 (c)

- 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? Yes No

115.35 (d)

- Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? Yes No
- Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? Yes No

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.35(a) The Washington County Sheriff's Office contracts with Sean Hackett, PA to provide medical care at the facility. The medical provider comes to the facility one day a week to provide a clinic for the inmates. There are no nurses or other medical personnel that work regularly in the facility. And, there is no mental health provider that works regularly in the Washington County Jail. An interview with the contract medical provider revealed that the provider has had training in recognizing and responding to victims of sexual abuse outside the facility. However, there has been no training on PREA and how to report a sexual abuse from the Jail. And, the Washington County Jail doesn't have anything in policy related to the training of medical practitioners who work regularly in its facility. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.35(b) The medical provider does not conduct forensic exams at the Washington County Jail. Victims of sexual abuse are transported to St. Luke's Meridian Medical Center in Meridian, Idaho for the exam, when medically appropriate.

115.35(c - d) The agency has not provided any specialized training that is required by this standard and, therefore, has not maintained documentation that the medical provider who works at the facility has received specialized training provided by the facility or elsewhere as listed in (a) of this standard. The Medical Provider has also not received the training mandated for other contractors of the facility. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.3
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Sean Hackett, PA, Medical Provider
Interview with Deputy Johnny Biddinger, PREA Coordinator

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should develop policy related to the training of medical and mental health practitioners who work regularly in the Jail.
2. The Washington County Jail should maintain documentation showing that the medical provider has completed the required training.

3. The Washington County Jail should provide training mandated for contractors of the facility.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has developed a PREA policy requiring the training of medical and mental health practitioners who work regularly in the Jail.
2. The Washington County Jail provided the auditor the documentation of training of the Medical Provider, as required by the standard, and is maintaining that documentation.
3. The Washington County Jail has provided the training mandated for contractors of the facility to the Medical Provider.

The auditor has reviewed all of the documents that were sent and the Washington County Jail is now fully compliant with this standard.

SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

Standard 115.41: Screening for risk of victimization and abusiveness

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.41 (a)

- 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 No
- 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 No

115.41 (b)

- Do intake screenings ordinarily take place within 72 hours of arrival at the facility?
 Yes No

115.41 (c)

- Are all PREA screening assessments conducted using an objective screening instrument?
 Yes No

115.41 (d)

- 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 No
- 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 No
- 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 No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?
 Yes No
- 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 No

- 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 No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)? Yes No
- 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 No
- 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 No
- 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 No

115.41 (e)

- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse? Yes No
- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses? Yes No
- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse? Yes No

115.41 (f)

- 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 No

115.41 (g)

- Does the facility reassess an inmate's risk level when warranted due to a: Referral? Yes No

- Does the facility reassess an inmate's risk level when warranted due to a: Request?
 Yes No
- Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse? Yes No
- Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?
 Yes No

115.41 (h)

- 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 No

115.41 (i)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.41(a) Washington County Jail Policy 15.4 requires the Booking Deputy to complete an initial PREA risk assessment on inmates when they booked into the facility. During the audit tour, the auditor interviewed a detention deputy who explained the booking process.

115.41(b) Initial risk assessments are now being conducted on all inmates at booking and are done within 72 hours. However, not all of the inmates have had an initial screening done as the Washington County Jail just began conducting initial screenings on inmates within the month prior to the audit. The auditor reviewed five initial risk assessments of inmates to verify they are being done. Because the Jail has only been doing the initial risk screenings for a short amount of time and not all of the inmates in the

facility have had the screening, the auditor finds that the Washington County Jail does not meet this standard.

115.41(c - d) The risk assessments are completed on an objective screening instrument that covers all ten of the topical areas of information as detailed in this standard. The auditor reviewed five files of inmates and verified that the screening instrument is now being used. The policy lists all ten topical areas of information and states they will be considered on the risk screening.

115.41(e) The screening instrument considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse as known to the agency.

115.41(f) Washington County Jail Policy 15.4 requires that a reassessment screening will be conducted by the PREA Coordinator within 30 days after booking to assess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening. At the time of the audit, there had been no reassessments done on any of the inmates since the initial assessments had just started being done within the month prior to the audit. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.41(g) The Washington County Jail Policy 15.4 also 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 directly affects the inmate's risk of victimization or abusiveness.

115.41(h) The policy prohibits the Washington County Jail from disciplining inmates for refusing to answer or for not disclosing complete information on any of the screening questions listed in this standard. Because the Washington County Jail does not discipline inmates for refusing to answer or not disclosing complete information on ANY of the questions for sexual victimization or abusiveness, the auditor finds that the Washington County Jail exceeds this part of the standard.

115.41(i) Policy states that strict controls are in place to prohibit staff from using the inmate's responses to the questions on the screening form to the detriment of the inmate. Policy states that if it does happen, the staff member will face disciplinary action. The screening instruments are kept in the Jail File and only the Sheriff, the Jail Administrator, PREA Coordinator, and active Jail staff have access to them and can authorize their use for housing, programs, and investigative decisions. The Washington County Jail does not have classification officers and all of the jail staff are responsible for housing and program decisions.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.4
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Objective Risk Screening Instrument
Interviews with random staff
Interview with Deputy Johnny Biddinger, PREA Coordinator
Random Inmate Files

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should complete a risk assessment on all inmates in the facility.

2. The Washington County Jail should complete an initial risk assessment on all inmates within 72 hours of booking.
3. The Washington County Jail should complete reassessments of all inmates within 30 days of booking.

All corrective action documentation should be sent to the auditor within 180 of the date of the interim report so that a final report can be issued as soon as possible after the 180-day corrective action period.

Once the Washington County Jail has completed corrective action on this standard, the Jail will exceed the standard because of 115.41(h).

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has updated the screening forms that are used for the risk assessment and all inmates who are in the facility and who are brought into the facility have completed the risk assessment.
2. The Washington County Jail completes an initial risk assessment of all inmates within 72 hours of intake.
3. The Washington County Jail completes reassessments of all inmates within 30 days of booking and PREA education is given to the inmate at the reassessment.

The auditor has reviewed all of the documents that were sent and the Washington County Jail is now fully compliant with this standard and exceeds the standard.

Standard 115.42: Use of screening information

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.42 (a)

- 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 No
- 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 No

- 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 No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments? Yes No
- 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 No

115.42 (b)

- Does the agency make individualized determinations about how to ensure the safety of each inmate? Yes No

115.42 (c)

- When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)? Yes No
- When making housing or other program assignments for transgender or intersex inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems? Yes No

115.42 (d)

- Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate? Yes No

115.42 (e)

- Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments? Yes No

115.42 (f)

- Are transgender and intersex inmates given the opportunity to shower separately from other inmates? Yes No

115.42 (g)

- Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? Yes No
- Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? Yes No
- Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.42(a) The Washington County Jail Policy 15.4 requires that all information gathered during the intake and assessment process be used to ensure appropriate classification and placement of inmates into housing, work programs, and regular programs as well as any necessary security or protective precautions required to ensure the inmate's safety.

115.42(b) Policy 15.4 states the Shift Supervisor will make individualized determinations about how to ensure the safety of each inmate.

115.42(c) The Washington County Jail policy requires that Classification deputies, Detention Deputies, and other appropriate personnel carefully consider, on a case-by-case basis, whether placement of a transgender or intersex inmate in a particular housing and bed assignment will ensure the inmate's health and safety and whether or not that placement would present management or security issues.

115.42(d) Policy 15.4 requires that at least monthly, the Jail will conduct a reassessment on all transgender and intersex inmates to review any threats of safety experienced by the inmate. The standard requires at least twice a year so the auditor finds that the Washington County Jail exceeds this part of the standard.

115.42(e) Transgender and intersex inmates are asked about their own view in respect to their safety while incarcerated in the facility and those considerations are given serious consideration by the Classification Officer when making housing, bed, and programming assignments.

115.42(f) Policy states that transgender and intersex inmates will be allowed to shower separately from other inmates.

115.42(g) The Washington County Jail Policy 15.4 prohibits placing lesbian, gay, bisexual, transgender or intersex inmates in a particular housing or bed assignment or other assignment based solely on such identifier or status unless the placement is ordered by a consent decree, legal settlement, or legal judgment of which the intent is the protection of inmates. The Washington County Jail is under no such legal restriction.

The Washington County Jail reported that they have had two transgender inmates housed in the facility during the twelve months prior to the audit. At the time of the audit, there were no transgender or intersex inmates in the facility to interview.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.4
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Objective Screening Instrument
Interviews with random staff
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.43: Protective Custody

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.43 (a)

- 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 No

- 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 No

115.43 (b)

- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible? Yes No
- 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 No
- 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 No
- 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 No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited? Yes No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation? Yes No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations? Yes No

115.43 (c)

- 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 No
- Does such an assignment not ordinarily exceed a period of 30 days? Yes No

115.43 (d)

- 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 No
- If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? Yes No

115.43 (e)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.43(a and d) The Washington County Jail Policy 15.4 prohibits the Jail from placing inmates at high risk for sexual victimization in involuntary restrictive housing unless the determination has been made that this housing assignment best protects the safety of the inmate and a review of other alternatives failed to provide adequate safety from likely abusers. The inmate may be placed in involuntary restrictive housing for a time period, not to exceed 24 hours, in order to complete the assessment and find appropriate housing. The policy details the procedures taken to maintain compliance with this standard. An interview with the PREA Coordinator confirmed that two inmates have been held in involuntary restrictive housing during the twelve months prior to the audit. Both inmates were transgender and the determination was made that each one would not be safe housed in either a male or female pod. Washington County Jail is a small facility and the only safe option of housing was in the restrictive housing pod.

115.43(b) The policy requires any inmates placed in involuntary restrictive housing have access to programs, privileges, education and work opportunities to the extent possible. If opportunities are restricted, the Washington County Jail will document the event in which opportunities have been limited, the duration of the limitation, and the reasons for the limitations. Neither transgender inmate was restricted from access to programs, privileges, education, or work opportunities. But, only one of them chose to attend programs.

115.43(c) If no alternative housing can be found immediately, the inmate may normally be held in involuntary restrictive housing for no more than 30 days. One of the transgender inmates was released at 30 days and one was released at 31 days.

115.43(d) The involuntary restrictive housing of an inmate will be documented in the inmate's logs.

115.43(e) If an involuntary segregated housing assignment is made, a status review of the inmate will be completed every 30 days to determine if there is a continuing need to separate the inmate from the general population. All 30-day status reviews are documented.

At the time of the audit, there were no inmates assigned to involuntary segregated housing to separate them from likely abusers.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

- Washington County Jail Policy 15.4
- Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
- Objective Risk Assessment Instrument
- Idaho Jail Standards
- Written memo affirming care in restrictive housing
- Interviews with random staff and inmates
- Interview with Lt. Kelly Erickson, Jail Administrator
- Interview with Deputy Johnny Biddinger, PREA Coordinator

REPORTING

Standard 115.51: Inmate reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.51 (a)

- Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment? Yes No
- 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 No
- 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 No

115.51 (b)

- Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? Yes No
- Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials? Yes No
- Does that private entity or office allow the inmate to remain anonymous upon request? Yes No
- 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? Yes No

115.51 (c)

- Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties? Yes No
- Does staff promptly document any verbal reports of sexual abuse and sexual harassment? Yes No

115.51 (d)

- Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.51(a) The Washington County Jail clearly outlines multiple ways to privately report a sexual assault, sexual harassment, or retaliation from other inmates or staff for reporting sexual abuse or sexual harassment, and any staff neglect that may have contributed to sexual abuse or sexual harassment in its policy. Policy 15.5 states that inmates can report a sexual abuse or sexual harassment by telling a detention deputy, medical staff, other staff members, Detention or Agency administration, and volunteers or by submitting a kite, grievance, or letters to staff or administration. However, the information that is given to inmates is not the same and there is no detailed list given to the inmates of how to report. Interviews with random inmates revealed that they know there is a hotline and know they can tell a deputy. But, most were unsure of many more ways to report. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.51(b) The Washington County Jail has made arrangements with the Weiser Police Department to take reports of sexual abuse or sexual harassment from inmates in the facility and report them to the Washington County Jail. There is no written agreement. There is also a Rape Reporting hotline on the inmate phones that goes to the phone company who contacts the agency when they get a report. The inmates can also contact Rose Advocates who have agreed to report the incident if the inmate requests them to or the inmate is in danger. The Washington County Jail is in the process of getting an MOU with Rose Advocates. The facility also has in policy that inmates can contact a family member, friend, attorney or anyone else outside the agency to make a report. Inmates are rarely detained solely on civil immigration holds, but the agency has in policy that these inmates are provided information on how to contact relevant consular officials, Dept. of Homeland Security, and information is posted in the housing units of federal numbers they can call. Inmates have access to phones in their dayrooms and the Washington County Jail is currently working with their phone provider to make calls to the reporting agencies and advocates free calls. All of the above reporting methods are listed in policy but much of it is not posted or provided to the inmates. Interviews with random inmates revealed that most knew they could report to a friend or family but few knew any of the other ways to report outside the facility. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.51(c) The Washington County Jail Policy 15.5 requires all staff to accept reports made verbally, in writing, anonymously, and from third parties. All allegations are documented promptly upon receipt and reported to a supervisor who will initiate the investigation.

115.51(d) Staff at the Washington County Jail can privately report sexual abuse and sexual harassment to the Jail Administrator, Undersheriff, Sheriff, or Human Resources. This information is in Policy 15.5. Interviews with random staff revealed that they knew who they would report to, if needed, but most were not sure who policy directs them to report to and policy is the only way they are told of how to report privately. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

Interviews with random inmates demonstrated they were not very knowledgeable about how to report a sexual abuse or sexual harassment. All stated they had information given to them at booking, watched a video, and there are posters and flyers posted in every housing unit that explain how to report. All stated they could talk to a deputy or medical staff and that they could report anonymously, verbally, in writing or third party. Some of the inmates interviewed were being held for other agencies and said they had received the information at the other facility so didn't feel they needed it at Washington County Jail. The majority of inmates interviewed did not know how to report outside the facility or whether the calls were free or unmonitored.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.5
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
PREA flyers displayed in dayrooms
PREA Posters displayed in dayrooms
Inmate Orientation Video in both English and Spanish
Interviews with random inmates
Interviews with staff who conduct bookings
Interview with Deputy Johnny Biddinger, PREA Coordinator
One report from an inmate of inmate-on-inmate sexual harassment

CORRECTIVE ACTION REQUIRES:

1. The Washington County Jail should develop detailed lists of all of the ways to report and ensure that all inmates can access the information
2. The Washington County Jail should provide more comprehensive training to all inmates to ensure they know all the avenues available to them to report a sexual abuse or sexual harassment.
3. The Washington County Jail should provide more comprehensive training to all inmates to ensure they know what support services are available when sexually abused and how to contact those support services.
4. The Washington County Jail should ensure on the detailed list and in the training that the inmates know which reporting mechanisms outside the jail are free calls and are unmonitored.
5. The Washington County Jail should maintain documentation of providing the video to the inmates and of any other comprehensive education given to the inmates.
6. The Washington County Jail should provide training to staff on the reporting policy and ensure that they know how each of them can report privately a sexual assault of an inmate.

Documentation showing that a procedure is in place to provide more comprehensive training to all inmates to ensure they know all the avenues to report including outside the facility, and know which calls are free and unmonitored should be sent to the auditor within 160 days of the date of this interim report. Documentation of attendance of the comprehensive training should also be sent. Documentation showing the staff have had training on who to privately report a sexual assault should also be sent to the auditor. The auditor will then make arrangements to interview random inmates within the following twenty days to verify that they know how to report a sexual abuse and sexual harassment, that they know what support services are available to them if they become a victim of sexual assault, and which calls are free and unmonitored.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has created a flyer that is posted in every housing unit that describes all of the ways to report a sexual abuse and sexual harassment.
2. The Washington County Jail has revised its inmate handbook to provide detailed information on how to report an incident of sexual abuse and sexual harassment.
3. The Washington County Jail has added comprehensive training to its risk assessment and re-assessment and the deputy and inmate both sign the acknowledgement. The inmates are shown the PREA video weekly.
4. The flyer, inmate handbook, and comprehensive training include information on how to contact Rose Advocates, what services they provide, and that the calls are free and unmonitored. Rose Advocates have been very active with the agency and staff have been able to explain the process to the inmates.
5. The Washington County Jail maintains documentation of providing the video to the inmates and of any other comprehensive education given to the inmates about PREA.
6. Staff have been provided information on how they can report the sexual abuse or sexual harassment of an inmate privately.
7. The auditor conducted telephone interviews of five random inmates on May 30, 2018. The inmates were selected randomly from the 37 inmates incarcerated at the time of the telephone interviews. The inmates were able to successfully answer all of the questions the auditor had about reporting incidences of sexual abuse and sexual harassment inside the facility or to outside resources and the availability of advocates for emotional support. They were also able to explain to the auditor that the calls to the advocates are free and unmonitored

The auditor has reviewed all of the documents that were sent and the telephone interviews of inmates and the Washington County Jail is now fully compliant with this standard.

Standard 115.52: Exhaustion of administrative remedies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.52 (a)

- 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 No NA

115.52 (b)

- Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.) Yes No NA
- Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (c)

- 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 No NA
- 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 No NA

115.52 (d)

- 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 No NA
- If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.) Yes No NA
- At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (e)

- 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 No NA
- Are those third parties also permitted to file such requests on behalf of inmates? (If a third-party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.) Yes No NA
- If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)
 Yes No NA

115.52 (f)

- 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 No NA
- After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)
 Yes No NA
- After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.) Yes No NA
- After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)
 Yes No NA
- Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) Yes No NA
- Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) Yes No NA
- Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (g)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Washington County Jail is exempt from this standard as it does not require an inmate to submit a grievance to report a sexual abuse or sexual harassment incident. If an inmate does submit a grievance, it is withdrawn from the grievance system and treated as a complaint rather than a grievance.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.5
Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.53: Inmate access to outside confidential support services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.53 (a)

- 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 No

- 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? Yes No
- Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? Yes No

115.53 (b)

- Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws? Yes No

115.53 (c)

- Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse? Yes No
- Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.53(a and c) The Washington County Jail is working on an MOU with Rose Advocates to provide advocacy and in-person support services to a victim of sexual abuse through the forensic medical examination process as well as the investigatory interview process. Advocates provide support, crisis intervention, mental health counseling when needed, information and referral services to the victim. A phone interview with Rose Advocates verified they have agreed to provide these services as well as a 24/7 hotline to inmates who have been victims of sexual abuse. At the time of the audit, the Washington County Jail was working on the written MOU between Rose Advocates and the Jail but there was a

verbal agreement to provide these services. The Washington County Jail enables communication between the advocate and the victim in as confidential manner as possible. However, no information was posted in the housing units to inform inmates that Rose Advocates was available for support services and no contact numbers were given. The Jail was working with the phone company to make the calls free and unmonitored but that had not been completed at the time of the audit. Interviews with random inmates revealed that the majority of them did not know if support services were available or how to contact them. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.53(b) Prior to giving the inmate access to the advocate, the Washington County Jail Policy 15.5 states that the agency explains to the inmate that the communication will not be monitored and the advocate is offered free of charge to the inmate. The facility will also explain to the inmate that information may be relayed from the victim advocate in order to initiate and conduct an investigation into the sexual abuse allegation in accordance with mandatory reporting laws. However, at the time of the audit, none of this information had been given to inmates. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.53(c) At the time of the audit, the Washington County Jail did not have an MOU with Rose Advocates but both indicated it was being looked at. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

There have been no forensic medical examinations done during the past twelve months and a victim's advocate has not been requested or used by inmates so there was no documentation for the auditor to review.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.5
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
PREA informational pamphlet
PREA Poster
Inmate Handbook
Interviews with random inmates
Interview with Deputy Johnny Biddinger, PREA Coordinator
Phone interview with Rose Advocates

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should develop detailed lists of all of the ways to report and ensure that all inmates can access the information
2. The Washington County Jail should provide more comprehensive training to all inmates to ensure they know all the avenues available to them to report a sexual abuse or sexual harassment.
3. The Washington County Jail should provide more comprehensive training to all inmates to ensure they know what support services are available when sexually abused and how to contact those support services.

4. The Washington County Jail should ensure on the detailed list and in the training that the inmates know which reporting mechanisms outside the jail are free calls and are unmonitored.
5. The Washington County Jail should complete an MOU with Rose Advocates and ensure inmates know what services are available to them through the advocates.

Documentation showing that a procedure is in place to provide more comprehensive information and training to all inmates to ensure they know all the avenues to report including outside the facility, and know which calls are free and unmonitored should be sent to the auditor within 160 days of the date of this interim report. Information about Rose Advocates, services they provide, and contact information should also be provided to the inmates. Documentation of attendance of the comprehensive training should also be sent. A copy of the MOU with Rose Advocates should also be sent to the auditor. The auditor will then make arrangements to interview random inmates within the following twenty days to verify that they know how to report a sexual abuse and sexual harassment, that they know what support services are available to them if they become a victim of sexual assault, and which calls are free and unmonitored.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail has created a flyer that is posted in every housing unit that describes all of the ways to report a sexual abuse and sexual harassment.
2. The Washington County Jail has revised its inmate handbook to provide detailed information on how to report an incident of sexual abuse and sexual harassment.
3. The Washington County Jail has added comprehensive training to its risk assessment and re-assessment and the deputy and inmate both sign the acknowledgement. The inmates are shown the PREA video weekly.
4. The Washington County Jail entered into an MOU with Rose Advocates on May 7, 2018 to provide support services to inmates.
5. The flyer, inmate handbook, and comprehensive training include information on how to contact Rose Advocates, what services they provide, and that the calls are free and unmonitored. Rose Advocates have been very active with the agency and staff have been able to explain the process to the inmates.
6. The Washington County Jail maintains documentation of providing the video to the inmates and of any other comprehensive education given to the inmates about PREA.
7. Staff have been provided information on how they can report the sexual abuse or sexual harassment of an inmate privately.
8. The auditor conducted telephone interviews of five random inmates on May 30, 2018. The inmates were selected randomly from the 37 inmates incarcerated at the time of the telephone interviews. The inmates were able to successfully answer all of the questions the auditor had about reporting incidences of sexual abuse and sexual harassment inside the facility or to outside resources and the availability of advocates for emotional support. They were also able to explain to the auditor that the calls to the advocates are free and unmonitored

The auditor has reviewed all of the documents that were sent and the telephone interviews with inmates and the Washington County Jail is now fully compliant with this standard.

Standard 115.54: Third-party reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.54 (a)

- Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment? Yes No
- Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

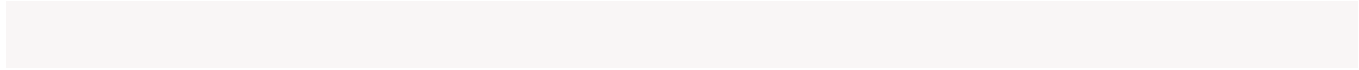
The narrative below must include a comprehensive discussion of all the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.54(a) The Washington County Jail allows third parties to report a sexual abuse or sexual harassment incident on behalf of an inmate. The agency provides information in its front lobby on how to report a sexual abuse or sexual harassment of an inmate. The flyer provides phone numbers to call detention staff, the PREA hotline number, and jail administration. The information explains that all reports of sexual abuse and sexual harassment are taken seriously and will be investigated.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Completed Pre-Audit Questionnaire completed by Deputy Johnny Biddinger
Flyer posted in the front lobby of the Washington County Sheriff's Office



OFFICIAL RESPONSE FOLLOWING AN INMATE REPORT

Standard 115.61: Staff and agency reporting duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.61 (a)

- 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 No
- 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 No
- 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 No

115.61 (b)

- Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions? Yes No

115.61 (c)

- 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 No
- Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services? Yes No

115.61 (d)

- 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 No

115.61 (e)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.61(a) The Washington County Jail Policy 15.6 requires staff to immediately report any suspected or alleged sexual abuse, sexual harassment, retaliation or neglect that occurred in a facility whether or not it is part of the agency. Interviews with random staff confirmed that this information is taught to staff in the yearly PREA training.

115.61(b) Policy 15.6 also prohibits staff from revealing any information related to a sexual abuse or sexual harassment report to anyone other than designated supervisors or officials and, to the extent necessary, to make treatment, investigation, and other security and management decisions. Interviews with random staff confirmed that this information is included in the yearly PREA training.

115.61(c) Medical and mental health practitioners within the facility are required to report sexual abuse that is disclosed to them by inmates and, at the initiation of services, must inform the inmate of their duty to report the incident and the limitations of confidentiality. An interview with the medical provider revealed the provider knew the policy.

115.61(d) If the alleged victim is under the age of 18, the Washington County Sheriff's Office reports the allegation of sexual abuse to the Idaho Department of Children and Family Services. If the alleged victim is a "vulnerable adult" the report will be made to Idaho Adult Protection Services.

115.61(e) All reports of allegations of sexual abuse and sexual harassment, including third-party and anonymous reports are submitted to the Jail Administrator who forwards them to the administrative investigators in the jail. If the allegation contains criminal elements, the Jail Administrator will forward the allegation to the Sheriff who will assign the criminal investigator from the Washington County Detective Division to conduct the investigation.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
PREA training curriculum
Interviews with random staff
Interview with the Medical Provider
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.62: Agency protection duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.62 (a)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.62(a) The Washington County Jail reports that there have been no situations in the past twelve months where the facility determined an inmate was subject to a substantial risk of imminent sexual abuse. Inmates at substantial risk of imminent sexual abuse are either removed from the housing unit and reassigned to other appropriate housing or another facility that ensures the inmate's safety or the perpetrator is reassigned to another housing unit or another facility, depending on the circumstances of the situation. There will be direct monitoring of the victim in most circumstances and the victim will, if needed, be referred to a counselor for emotional or psychological support.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interviews with random staff
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.63: Reporting to other confinement facilities

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.63 (a)

- 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 No

115.63 (b)

- Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation? Yes No

115.63 (c)

- Does the agency document that it has provided such notification? Yes No

115.63 (d)

- Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.63(a) The Washington County Jail Policy 15.6 requires the Sheriff, Undersheriff, or Jail Administrator to report any abuse allegation received regarding an inmate abused at another facility to the agency head, or appropriate officer, where the sexual abuse is alleged to have occurred.

115.63(b) Policy requires this notice to occur as soon as possible but no later than within 72 hours of receiving the allegation.

115.63(c) The notification from the Washington County Jail to the other agency is documented on an Incident Log. The Washington County Jail reported there have been no reports of this type during the twelve months prior to the audit.

115.63(d) Upon receiving notification from an outside facility that an inmate was sexually abused while in the custody of the Washington County Jail, the allegation is referred immediately to the Washington County Jail Administrative investigators or the Washington County Detective Division, depending on the nature of the allegation. If a staff member was allegedly involved, the Sheriff or Undersheriff will request an outside law enforcement agency do the investigation. The Washington County Jail reported there have been no reports of this type during the past twelve months.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Sheriff Matt Thomas
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.64: Staff first responder duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.64 (a)

- 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 No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? Yes No
- 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 No
- 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 No

115.64 (b)

- If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.64(a) The Washington County Jail Policy 15.6 outlines in policy and a detailed first responder checklist, the responsibilities of all staff members receiving an allegation of sexual abuse. The checklist and policy details in depth the following guidelines for the first responder and includes much more:

- (1) Separate the alleged victim and abuser;
- (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;
- (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, 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; and
- (4) 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.

There was also a very detailed checklist of the supervisor's responsibilities when an allegation of sexual abuse is made. The checklist details what to do with both the alleged victim and alleged abuser. The Washington County Jail reported that in the past twelve months, there were no allegations that an inmate was sexually abused in the facility.

115.64(b) Policy states that when the first staff responder is not a security staff member, he or she shall request that the alleged victim not take any actions that could destroy physical evidence and then notify security staff immediately. There were no incidents in which a non-security staff member was the first responder during the audit cycle.

Interviews with random staff and supervisors confirmed that staff are very knowledgeable in their duties as a first responder to a sexual abuse or sexual harassment incident and are familiar with the First Responder Checklist. All stated that they have had extensive training on their duties as a First Responder.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
First Responder's Checklist
Interviews with random staff
Interview with Medical Provider
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.65: Coordinated response

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.65 (a)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.65(a) The Washington County Jail Policy 15.6 requires a coordinated response plan that coordinates the actions of first responders, medical and mental health practitioners, investigators, and facility leadership. The plan is in the policy and outlines the responsibilities of first responders, shift supervisors, medical practitioners, mental health practitioners, the Jail Administrator, and administrative and criminal investigators. There is also a very detailed checklist for first responders and a detailed sexual assault incident form/checklist to make sure all duties are covered.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Coordinated Response Plan
Response checklist of First Responders
Sexual assault incident form/checklist

Interviews with investigators
Interviews with random staff
Interview with Deputy Johnny Biddinger, PREA Coordinator
Interview with Shift Supervisor

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

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.66 (a)

- 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 limits 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 No

115.66 (b)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Washington County Sheriff's Office and Jail do not have any collective bargaining agreements in place and have not had any at any time. Washington County Sheriff's Office is non-union and, therefore, has no union collective bargaining agreements. Therefore, the auditor determined that this standard is not applicable to the Washington County Sheriff's Office and Jail.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Sheriff Matt Thomas
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.67: Agency protection against retaliation

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.67 (a)

- Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff? Yes No
- Has the agency designated which staff members or departments are charged with monitoring retaliation? Yes No

115.67 (b)

- Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations? Yes No

115.67 (c)

- 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 residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? Yes No
- 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 No
- 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 No

- 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 No
- 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 No
- 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 No
- 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 No
- 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 No
- Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? Yes No

115.67 (d)

- In the case of inmates, does such monitoring also include periodic status checks?
 Yes No

115.67 (e)

- 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 No

115.67 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.67(a and d) Washington County Jail Policy 15.6 prohibits retaliation against inmates or staff members who report sexual abuse or sexual harassment and requires monitoring of the inmate or staff member for retaliation. An interview with Deputy Johnny Biddinger revealed the PREA Coordinator will be responsible for monitoring retaliation.

115.67(b) Policy states that the Jail will protect 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. Monitoring will include periodic status checks on inmates. Such protections shall be afforded via housing changes to separate victims from abusers, removal of alleged staff members from contact with victims, and emotional support services for inmates or staff members who fear retaliation.

115.67(c) Washington County Jail Policy 15.6 requires monitoring the conduct and treatment of inmates and staff who report sexual abuse or sexual harassment and of inmates who were reported to have suffered sexual abuse for signs of changes that may suggest possible retaliation and shall act promptly to remedy any such retaliation. This monitoring is to continue for 90 days or longer if the initial monitoring indicates a need for further monitoring. Monitoring includes, but is not limited to:

- (1) Inmate disciplinary reports
- (2) Periodic status checks
- (3) Housing
- (4) Program changes
- (5) Negative performance reviews of staff
- (6) Reassignments of staff
- (7) Complaints from co-workers of staff conduct relating to retaliation
- (8) Inmate grievances of possible staff or inmate conduct relating to retaliation

115.67(d) Policy also requires the facility to take proper measures to protect any other individual who has cooperated with an investigation and expresses a fear of retaliation. During the twelve months prior to the audit, there was one allegation of sexual harassment and none of sexual abuse. The allegation was determined to be unfounded. The monitoring of the inmate showed no instances of retaliation for reporting sexual harassment.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger

Interview with Sheriff Matt Thomas
Interview with Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator
Investigation reports and retaliation monitoring

Standard 115.68: Post-allegation protective custody

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.68 (a)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.68(a) The Washington County Jail Policy 15.6 prohibits the deputies from placing inmates who allege to have suffered sexual abuse in involuntary restrictive housing unless the determination has been made that this housing assignment best protects the safety of the inmate and a review of other alternatives failed to provide adequate safety from likely abusers. When inmates are placed in involuntary restrictive housing in order to separate the victim from the abuser, the placement is only for the time needed to finish the investigation and find alternative housing. The policy details the procedures taken to maintain compliance with this standard. Interviews with random staff and inmates revealed no incidents of involuntary housing being used for this purpose. There were no inmates in involuntary restrictive housing for this purpose for the auditor to interview and the Washington County Jail reported that no inmates have been placed in involuntary restrictive house for this purpose during the twelve months prior to the audit.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.6

Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger

Interviews with random staff

Interview with Lt. Kelly Erickson, Jail Administrator

Interview with Deputy Johnny Biddinger, PREA Coordinator

INVESTIGATIONS

Standard 115.71: Criminal and administrative agency investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.71 (a)

- 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 No NA
- 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 No NA

115.71 (b)

- Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34? Yes No

115.71 (c)

- Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data? Yes No
- Do investigators interview alleged victims, suspected perpetrators, and witnesses?
 Yes No
- Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator? Yes No

115.71 (d)

- 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 No

115.71 (e)

- 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 No
- 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 No

115.71 (f)

- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? Yes No
- 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 No

115.71 (g)

- 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 No

115.71 (h)

- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution? Yes No

115.71 (i)

- 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 No

115.71 (j)

- 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 No

115.71 (k)

- Auditor is not required to audit this provision.

115.71 (l)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

Does Not Meet Standard (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.71(a) Washington County Jail Policy 15.7 requires that investigators initiate an investigation immediately upon receiving an allegation of sexual abuse or sexual harassment. Administrative investigations are done by the detention investigators, criminal by an investigator in the Washington County Detective Division, and, when staff are allegedly involved, the case is referred by the Sheriff to an outside law enforcement agency. This is done promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports

115.71(b) There are two investigators assigned to investigate sexual abuse and sexual harassment in the Washington County Jail and one investigator from the Washington County Detective Division. A review of the detective's training record confirmed that he has had the specialized training for investigators. This training was the NIC classroom training, "Investigating Sexual Abuse in a Confinement Setting". This training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or referral to the prosecutor for criminal charges. In addition, the detective has had extensive training on sexual abuse investigations and use Miranda and Garrity warnings frequently in the regular job.

The two administrative investigators have not taken the specialized training. Therefore, the auditor finds that the Washington County Jail does not meet this part of the standard.

115.71(c) Interviews with both administrative and criminal investigators confirmed that upon initiation of an investigation into a sexual abuse allegation, the investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data, interview alleged victims, suspected perpetrators, and witnesses. and review prior complaints and reports of sexual abuse involving the suspected perpetrator.

115.71(d) Unless the allegation is an immediately recognizable criminal investigation, investigations will be initiated as an administrative investigation. All administrative investigations are done by Washington County Jail investigators. If there is any indication that the investigation appears to support criminal prosecution, the Jail investigators will confer with prosecutors before using compelled interviews. However, it is rare for this to happen as the administrative investigators alert the supervisor if the investigation appears to have criminal elements and the case is referred to the Washington County Detective Division to initiate a criminal investigation. The Washington County Detectives are aware of when compelled interviews are an obstacle to prosecution as they use them frequently in their regular job. In the interview with the criminal investigator, the investigator stated that they would contact the prosecutor before using compelled interview if the investigator had any doubts about the interview.

115.71(e) Washington County Jail Policy 15.7 requires that the credibility of the alleged victim will be assessed on a case-by-case basis and shall not be determined by the person's status as an inmate.

During interviews with investigators they confirmed that this was practice as well as policy. The investigator also stated that inmates will be treated humanely while receiving the same response to their allegations of sexual abuse or sexual harassment as someone from outside the facility would receive.

Inmates who allege sexual abuse are not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation.

115.71(f) Policy requires that a thorough report be written at the conclusion of an administrative investigation that includes a description of what evidence was collected or reviewed, the reasons behind any credibility assessments, and any facts and findings the investigator discovered in the investigation. Investigators will also consider whether staff actions or failures to act contributed to the incident of abuse. All reports are forwarded to the Sheriff for his review and consideration of the determination.

115.71(g and h) Washington County Jail Policy 15.7 and interviews with criminal investigators confirm that comprehensive reports are written at the conclusion of criminal investigations and the reports fully describe any physical, testimonial, and documentary evidence gathered, considered, or relied on. When it is practical, copies of documentary evidence are attached to the report. Substantiated criminal investigations are referred for prosecution, when warranted. During the twelve months prior to the audit, there have not been any criminal abuse allegations or investigations in the facility.

115.71(i) Washington County Jail Policy 15.7 requires all written reports referenced in 115.71(f and g) are retained for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

115.71(j) If an alleged abuser or victim leaves the facility or the employ of the agency, the investigation will continue and will not be terminated until it is officially closed with a determination. This practice was confirmed by interviews with investigators.

115.71(l) When an outside law enforcement agency is assigned to an investigation, the Washington County Sheriff's Office and Jail will cooperate fully with the investigators and will stay informed as to the progress of the investigation. Interviews with Washington County investigators explained that there is a very good working relationship between the Washington County Sheriff's Office and the agencies that assist in investigations.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.7
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Objectives for the online course, "Investigating Sexual Abuse in a Confinement Setting"
Training documentation for criminal investigators completing the specialized training
Interview with Sheriff Matt Thomas
Interviews with administrative and criminal investigators
Interview with Deputy Johnny Biddinger, PREA Coordinator

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should provide the specialized training for investigations of sexual abuse in a confinement setting to the two administrative investigators. This training may be the NIC online course.

Documentation that the two administrative investigators have taken the specialized training should be sent to the auditor within 180 days of the date of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

4. The Washington County Sheriff's Office sent two administrative investigators and one criminal investigator to attend the course, "Investigating Sexual Abuse in a Confinement Setting" in Las Vegas, Nevada on March 26, 2018. Certificates of Completion were sent to the auditor and are being kept on file at the Washington County Sheriff's Office.

The auditor has reviewed all of the documents that were sent and the Washington County Jail is now fully compliant with this standard.

Standard 115.72: Evidentiary standard for administrative investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.72 (a)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.72(a) Washington County Jail Policy 15.7 requires the Washington County Sheriff's Office to impose no standard higher than a preponderance of evidence in determining whether allegations of sexual abuse or sexual harassment in administrative investigations are substantiated. Interviews with investigators confirmed that this is the standard of determination of substantiation.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.7
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interviews with investigative staff
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.73: Reporting to inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.73 (a)

- 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 No

115.73 (b)

- If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.) Yes No NA

115.73 (c)

- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility? Yes No
- 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 No
- 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 No

115.73 (d)

- 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 No
- 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 No

115.73 (e)

- Does the agency document all such notifications or attempted notifications? Yes No

115.73 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.73(a) Washington County Jail Policy 15.7 requires upon completion of any administrative or criminal investigation of sexual abuse or sexual harassment in the facility, the facility will inform the inmate as to whether the allegation was determined to be substantiated, unsubstantiated, or unfounded. The Washington County Jail reported that one allegation of sexual harassment was made and the inmate making the allegations was informed as to the determination of the investigation.

115.73(b) When an outside law enforcement agency is brought in to conduct an investigation, the inmate will be notified of the outcome when it is known. Outside investigations do not happen often, but it is in policy that the notification is made.

115.73(c) Washington County Jail Policy 15.7 is consistent with the standard for notification when an employee has sexually abused an inmate. The Washington County Jail reported that no allegations of this type were reported during the twelve months prior to the audit.

115.73(d) The policy is consistent with this standard. The Washington County Jail hasn't had any incidents of inmate-on-inmate sexual abuse that resulted in criminal charges or criminal convictions during the past twelve months.

115.73(e) Notifications to inmates are documented in the inmate's log.

115.73(f) The Washington County Jail's obligation to report under this standard terminates if the inmate is released from the facility before the investigation has been completed.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.7
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Sexual Assault Incident Form
Interview with administrative and criminal investigators
Interview with Deputy Johnny Biddinger, PREA Coordinator

DISCIPLINE

Standard 115.76: Disciplinary sanctions for staff

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.76 (a)

- Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies? Yes No

115.76 (b)

- Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse? Yes No

115.76 (c)

- 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 No

115.76 (d)

- 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 No
- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.76(a - c) Washington County Jail Policy 15.8 requires any staff member found in violation of the agency sexual abuse or sexual harassment policies is subject to progressive discipline which includes sanctions up to and including termination. Progressive discipline considers the circumstances, the staff member's disciplinary history, and sanctions imposed for comparable offenses by other staff with similar histories when imposing sanctions. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse of an inmate.

The Washington County Jail reported that no incidents of staff-on-inmate sexual harassment or sexual abuse was reported during the twelve months prior to the audit.

115,76(d) 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, shall be reported to any relevant licensing bodies. All terminations and resignations are reported to Idaho P.O.S.T and, if the case involves possible criminal charges, an investigation is done by Idaho P.O.S.T as well.

The Washington County Jail reports that in the past twelve months, there has been no staff member from the facility who has been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies. Additionally, there has been no staff member in the past twelve months who has been disciplined for violations of the agency sexual abuse or sexual harassment policies. There has been no staff member that has been reported to law enforcement, Idaho P.O.S.T., or any other licensing boards for violating agency policies.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.8
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.77: Corrective action for contractors and volunteers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.77 (a)

- Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates? Yes No
- Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)? Yes No
- Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies? Yes No

115.77 (b)

- In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.77(a) The Washington County Jail Policy 15.8 prohibits contractors and volunteers who have engaged in sexual abuse from having contact with inmates. Violations are reported to any relevant licensing boards and if the abuse was criminal, the Washington County Sheriff's Office will seek prosecution.

115.77(b) In any violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, the agency will take appropriate remedial measures and will consider whether the volunteer or contractor will be retained, dismissed or prohibited from contact with inmates.

The Washington County Jail reported that there were no contractors or volunteers who were alleged to have violated the agency's sexual abuse or sexual harassment policies during the past twelve months.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.8
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.78: Disciplinary sanctions for inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.78 (a)

- 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 No

115.78 (b)

- Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories? Yes No

115.78 (c)

- 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 No

115.78 (d)

- 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 No

115.78 (e)

- 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 No

115.78 (f)

- 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 No

115.78 (g)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.78(a) Washington County Jail has in place a comprehensive progressive inmate disciplinary process for rule and law violations by inmates. A formal disciplinary process will be given to inmates who have been found guilty in an administrative or criminal investigation of inmate-on-inmate sexual abuse or inmate-on-inmate sexual harassment.

115.78(b) If the inmate is found guilty in the disciplinary hearing, the sanctions imposed will consider the circumstances of the incident, the disciplinary history of the inmate, and the sanctions imposed on others for similar violations.

The Washington County Jail reported that during the past twelve months, no incidents of inmate-on-inmate sexual abuse or inmate-on-inmate sexual harassment resulted in the abusers being sent through the formal disciplinary process.

115.78(c) Washington County Jail Policy 15.8 requires that the disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to the behavior when determining what type of sanctions, if any, should be imposed.

115.78(d) The Washington County Jail does not provide therapy, counseling, or other interventions for inmate abusers.

115.78(e) The Washington County Jail disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. The Washington County Jail reported that there were no instances of this type of sexual abuse during the past twelve months.

115.78(f) Inmates of the Washington County Jail will not be disciplined for filing a false report of sexual abuse when the inmate believed the incident actually happened and filed the report in good faith.

115.79(f) Agency policy prohibits all sexual activity between inmates but doesn't deem such activity sexual abuse unless it is determined that the activity was coerced. Washington County Jail reported that, during the past twelve months, there were no instances where administrative or criminal investigations were conducted for inmate-on-inmate sexual abuse, consensual or non-consensual.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.8
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Inmate Handbook
Interview with Deputy Johnny Biddinger

MEDICAL AND MENTAL CARE

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

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.81 (a)

- 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? Yes No

115.81 (b)

- If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.) Yes No NA

115.81 (c)

- 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? Yes No

115.81 (d)

- 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 No

115.81 (e)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.81(a and c) When an inmate discloses sexual abuse either at an institutional facility or in a community setting, Washington County Jail Policy 15.9 requires the Booking/Screening Deputy offer the inmate follow-up counseling. If the inmate requests follow-up counseling, the inmate is referred to the Medical Provider to ensure a follow-up meeting is done within 14 days. Screenings on inmates just started within the month prior to the audit and some of the inmates in the jail had not had screenings or been asked about sexual victimization and follow-up counseling. The auditor interviewed one inmate who had been the victim of sexual abuse in the community prior to arrest and the inmate stated he was not asked if he had been sexually assaulted or if he needed follow-up counseling. The auditor asked the inmate if follow-up counseling was needed and the inmate replied no. The auditor finds that the Washington County Jail does not meet this part of the standard because not all of the inmates in the jail have been screened for sexual victimization.

115.81(d) Interviews with random staff verified that any information related to the sexual abuse or victimization of an inmate is limited to Medical and Mental Health practitioners to prescribe treatment and jail classification to determine security and management decisions as specified in this standard.

115.81(e) Interviews with the Medical Provider verified that informed consent disclosures are offered to inmates before reporting prior sexual victimization that did not occur in an institutional setting unless the inmate is under the age of 18.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.9
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Objective Risk Assessment Form
Interviews with random staff
Interview with Medical Provider
Interview with Deputy Johnny Biddinger, PREA Coordinator

CORRECTIVE ACTION REQUIRED:

1. The Washington County Jail should do a screening on all inmates who are booked into the jail and one on all inmates who are currently in the jail and have not had the screening.
2. Inmates who disclose sexual victimization either in an institution or in the community should be offered follow-up counseling.

Verification that all inmates in the Washington County Jail have had either the initial screening or a reassessment within 30 days to determine their risk for sexual victimization should be sent to the auditor within 180 days of the date of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On May 29, 2018, the Washington County Jail sent the auditor verification and copies of documentation that the corrective action noted in the interim report has been corrected as follows:

1. The Washington County Jail completes a screening of all inmates who are booked into the jail and has given a screening to all inmates who are currently in the jail.
2. The Washington County Jail offers follow-up counseling to inmates who disclose sexual victimization either in an institution or in the community. This was verified during the May 30, 2018 telephone interviews with two inmates of the Washington County Jail who confirmed they were offered follow-up counseling.

The auditor has reviewed all of the documents that were sent and the telephone interviews with inmates and the Washington County Jail is now fully compliant with this standard.

Standard 115.82: Access to emergency medical and mental health services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.82 (a)

- 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 No

115.82 (b)

- If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? Yes No

- Do security staff first responders immediately notify the appropriate medical and mental health practitioners? Yes No

115.82 (c)

- 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 No

115.82 (d)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.82(a) An interview with the Medical Provider confirmed that inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The Washington County Jail reported there were no inmate victims of sexual abuse in the last twelve months who needed emergency care so the auditor had no medical records to review.

115.82(b) If no qualified medical practitioners are on duty at the time a report of recent sexual abuse, the First Responder will take preliminary steps to protect the inmate and will immediately notify the appropriate medical practitioners. Also, in an emergency, the First Responder may ask the Emergency Medical Technicians be contacted and dispatched. When necessary, all victims are transported to St. Luke's Meridian Medical Center in Meridian, Idaho where SAFE or SANE exams are conducted. Inmates are offered a victim's advocate to accompany them through the exam and subsequent investigation.

115.82(c) An Interview with the Medical Provider confirmed that inmate victims of sexual abuse are offered information about, and timely access to, emergency contraception and sexually transmitted

infections prophylaxis, when appropriate. The Washington County Jail reported there haven't been any instances during the past twelve months where inmates have needed this information or care.

15.82(d) In all circumstances of sexual abuse within the facility, treatment and advocates are provided to the victim inmate free of charge.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.9
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Medical Provider
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

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

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.83 (a)

- 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 No

115.83 (b)

- Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody? Yes No

115.83 (c)

- Does the facility provide such victims with medical and mental health services consistent with the community level of care? Yes No

115.83 (d)

- Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.) Yes No NA

115.83 (e)

- If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.) Yes No NA

115.83 (f)

- Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate? Yes No

115.83 (g)

- 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 No

115.83 (h)

- 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 No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.83(a - c) Washington County Jail Policy 15.9 requires health evaluations and, as appropriate, treatment to all inmates who have been sexually abused in any correctional institution. An interview with

Medical Provider confirmed that the care is consistent with the community level of care and he will offer referrals to the inmate for continuing care, when necessary, when the inmate leaves the facility. The Washington County Jail reported that, during the past twelve months, there have been no inmates that have requested referrals for continuing care upon release from the facility.

115.83(d - f) An interview with the Medical Provider confirmed that female inmate victims of sexual abuse are offered pregnancy tests and information about timely access to all lawful pregnancy related medical services. The interview also confirmed that inmates who have been sexually abused are offered tests for sexual transmitted infections, as medically appropriate. Medical practitioners will provide ongoing treatment to inmates, when needed.

115.83(g) In all circumstances of sexual abuse within the facility, treatment and advocates are provided to the victim inmate free of charge.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

- Washington County Jail Policy 15.9
- Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
- Interview with Medical Provider
- Interview with Deputy Johnny Biddinger, PREA Coordinator

DATA COLLECTION AND REVIEW

Standard 115.86: Sexual abuse incident reviews

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.86 (a)

- 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 No

115.86 (b)

- Does such review ordinarily occur within 30 days of the conclusion of the investigation? Yes No

115.86 (c)

- Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners? Yes No

115.86 (d)

- 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 No
- Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility? Yes No
- 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 No
- Does the review team: Assess the adequacy of staffing levels in that area during different shifts? Yes No
- Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff? Yes No
- 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 No

115.86 (e)

- Does the facility implement the recommendations for improvement, or document its reasons for not doing so? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.86(a) Washington County Jail Policy 15.10 requires that a review team will review each incident of sexual abuse or sexual harassment that was investigated in the facility, unless the incident is unfounded.

115.86(b - c) The Review Team consists of the PREA Coordinator, members of command and administrative staff, and any other person with relevant information for the review. The review occurs within 30 days of the incident.

115.86(d) The focus of the review is to determine if there are corrective actions required to prevent future incidents. The Washington County Jail has a very detailed checklist to do for the review. The review team will prepare a report of its finding, determinations, and suggestions for improvement and will forward the report to the Jail Administrator and the PREA Coordinator.

115.86(e) The Sheriff or his authorized designee will implement the recommendations for improvement or document the reasons for not doing so.

The Washington County Jail reports that there have been no incident reviews done at the time of the audit.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.10

Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interviews with investigative staff
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.87: Data collection

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.87 (a)

- 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 No

115.87 (b)

- Does the agency aggregate the incident-based sexual abuse data at least annually? Yes No

115.87 (c)

- 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 No

115.87 (d)

- Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews? Yes No

115.87 (e)

- 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.) Yes No NA

115.87 (f)

- 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 No NA

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.87(a) Washington County Jail Policy 15.10 requires that the agency collect accurate, uniform data for every allegation of sexual abuse at the facility and use a standardized instrument and set of definitions. The facility uses the actual survey form to collect the data.

115.87(b) Policy directs the Washington County Jail to aggregate the data annually but there have been no incidents during the last twelve months to collect data from.

115.87(d - e) The Washington County Jail policy and practice requires the collection of the data in accordance with this standard but there has been no data to collect.

115.87(f) Washington County Policy 15.10 states that upon request, the Washington County Jail shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.10
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

Standard 115.88: Data review for corrective action

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.88 (a)

- 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 No
- 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 No
- 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 No

115.88 (b)

- Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse Yes No

115.88 (c)

- 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 No

115.88 (d)

- Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.88(a) Washington County Jail reported that no annual report has been written because there have not been any sexual abuse incidents in the Jail over the last twelve months.

115.88(b - d) No annual report has been written. The auditor has based the determination of meeting the standard on policy alone as there have been no incidents and no data collected

Based on the information discovered in the facility's policies, documents received prior to the audit, observations made and documents reviewed during the onsite audit, as well as information obtained through staff interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.10
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Sheriff Matt Thomas
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger

Standard 115.89: Data storage, publication, and destruction

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.89 (a)

- Does the agency ensure that data collected pursuant to § 115.87 are securely retained?
 Yes No

115.89 (b)

- Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means? Yes No

115.89 (c)

- Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available? Yes No

115.89 (d)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.89(a and d) Washington County Jail Policy 15.10 requires that data collected according to this standard is securely retained and will maintain sexual abuse data for at least 10 years after the date of the initial collection. However, there has been no data to collect and retain.

115.89(b - c) Washington County Jail Policy 15.10 requires that specific material such as personal identifiers or other information that could threaten the safety of the Jail be removed from the annual report and a notice as to what type of information was redacted.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Washington County Jail Policy 15.10
Completed Pre-Audit Questionnaire submitted by Deputy Johnny Biddinger
Interview with Sheriff Matt Thomas
Interview with Lt. Kelly Erickson, Jail Administrator
Interview with Deputy Johnny Biddinger, PREA Coordinator

AUDITING AND CORRECTIVE ACTION

Standard 115.401: Frequency and scope of audits

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.401 (a)

- During the three-year period starting on August 20, 2013, and during each three-year period thereafter, 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? (N/A before August 20, 2016.)
 Yes No NA

115.401 (b)

- During each one-year period starting on August 20, 2013, 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? Yes No

115.401 (h)

- Did the auditor have access to, and the ability to observe, all areas of the audited facility?
 Yes No

115.401 (i)

- Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)? Yes No

115.401 (m)

- Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?
 Yes No

115.401 (n)

- 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 No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Governor of Idaho opted to not participate in bringing PREA into the state at first. However, he has taken a new direction in the last couple of years and has now stated that Idaho will be working toward PREA compliance. Therefore, the Washington County Jail did not have an audit within the first three years but has now requested the audit and intends to conduct an audit in the future every three years.

Standard 115.403: Audit contents and findings

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.403 (f)

- The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. 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 that there has never been a Final Audit Report issued.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Instructions for Overall Compliance Determination Narrative

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Washington County Jail has not had any allegations of sexual abuse and, therefore, has not written an annual report for this year.

AUDITOR CERTIFICATION

I certify that:

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

Auditor Instructions:

Type your full name in the text box below for Auditor Signature. This will function as your official electronic signature. Auditors must deliver their final report to the PREA Resource Center as a searchable PDF format to ensure accessibility to people with disabilities. Save this report document into a PDF format prior to submission.¹ Auditors are not permitted to submit audit reports that have been scanned.² See the PREA Auditor Handbook for a full discussion of audit report formatting requirements.

Cynthia Malm

May 31, 2018

Auditor Signature

Date

¹ See additional instructions here: <https://support.office.com/en-us/article/Save-or-convert-to-PDF-d85416c5-7d77-4fd6-a216-6f4bf7c7c110>.

² See *PREA Auditor Handbook*, Version 1.0, August 2017; Pages 68-69.