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

☐ **Interim** ☒ **Final**

Date of Report January 28, 2019

Auditor Information

Name: Cynthia Malm	**Email:** cmalm@idahosheriffs.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:** August 6 – 8, 2018

Agency Information

Name of Agency: Latah County Sheriff's Office		**Governing Authority or Parent Agency** *(If Applicable)*: Latah County	
Physical Address: 522 S. Adams		**City, State, Zip:** Moscow, ID 83843	
Mailing Address: P.O. Box 8068		**City, State, Zip:** Moscow, ID 83843	
Telephone: 208-883-5705		**Is Agency accredited by any organization?** ☐ Yes ☒ No	
The Agency Is:	☐ Military	☐ Private for Profit	☐ Private not for Profit
☐ Municipal	☒ County	☐ State	☐ Federal

Agency mission: Mission Latah County Sheriff's Office: The mission of the Latah County Sheriff's Office is to provide our citizens and guests a safe environment in which to live and visit, and to help create a climate that enhances growth and economic development. Using resources made available to us, we will provide Latah County with the most professional, capable, and responsive law enforcement, corrections, and communications service possible. We will provide a visible presence in our communities, take decisive action against the production, sale and usage of illegal drugs, and hold violators of the law accountable.

Agency Website with PREA Information: www.latah.id.us/sheriff

Agency Chief Executive Officer

Name: Richard Skiles	**Title:** Sheriff
Email: rskiles@latah.id.us	**Telephone:** 208-882-2216

Agency-Wide PREA Coordinator	
Name: Kiri Alldredge	**Title:** Cpl.
Email: kalldredge@latah.id.us	**Telephone:** 208-883-5705
PREA Coordinator Reports to: Lt. Ron Manell	**Number of Compliance Managers who report to the PREA Coordinator** 0

Facility Information

Name of Facility: Latah County Jail			
Physical Address: 522 S. Adams, Moscow, ID 83843			
Mailing Address (if different than above): P.O. Box 8068, Moscow, ID 83843			
Telephone Number: 208-883-5705			
The Facility Is:	☐ Military	☐ Private for profit	☐ Private not for profit
☐ Municipal	☒ County	☐ State	☐ Federal
Facility Type:	☒ Jail	☐ Prison	
Facility Mission: Click or tap here to enter text.			
Facility Website with PREA Information: www.latah.id.us/sheriff			

Warden/Superintendent	
Name: Ron Manell	**Title:** Lieutenant
Email: rmanell@latah.id.us	**Telephone:** 208=883-5705

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: Sherry Stoutin (Ivy Medical)	**Title:** Medical Director
Email: medical@co.nezperce.id.us	**Telephone:** 208-750-2088 Ext. 4774

Facility Characteristics

Designated Facility Capacity: 42		**Current Population of Facility:** 21		
Number of inmates admitted to facility during the past 12 months				779
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more:				106
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more:				763
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:** 0	**Adults:** 18-75		
Are youthful inmates housed separately from the adult population?		☐ Yes	☐ No	☒ NA
Number of youthful inmates housed at this facility during the past 12 months:				1
Average length of stay or time under supervision:				5 to 20 days
Facility security level/inmate custody levels:				Minimum, Medium, Maximum, Close Custody
Number of staff currently employed by the facility who may have contact with inmates:				12
Number of staff hired by the facility during the past 12 months who may have contact with inmates:				5
Number of contracts in the past 12 months for services with contractors who may have contact with inmates:				2

Physical Plant

Number of Buildings: 1	**Number of Single Cell Housing Units:** 1
Number of Multiple Occupancy Cell Housing Units:	2
Number of Open Bay/Dorm Housing Units:	3
Number of Segregation Cells (Administrative and Disciplinary:	3

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.):

Electronic Monitoring: There are cameras throughout the jail in each hallway, entrance, storage room, and each of the cells. Cells with a dorm room and day room have a camera in each of the rooms. In the close custody cell, there are cameras pointed directly into each of the individual cells. The holding tank cell and one segregation cell (C3) have cameras that allow staff to see every corner of the cell. The kitchen is monitored via camera but there is not a camera in the back closet of the kitchen. There are not cameras in the rooms used to conduct strip searches and change inmates over. Cameras in each of the cells are placed to minimize the visibility of toilets and showers. Video is recorded and kept for a period of six months.

Medical

Type of Medical Facility:	Ivy Medical Contract
Forensic sexual assault medical exams are conducted at:	Gritman Medical Center

Other

Number of volunteers and individual contractors, who may have contact with inmates, currently authorized to enter the facility:	40
Number of investigators the agency currently employs to investigate allegations of sexual abuse:	5

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 (IPREA) on-site audit of the Latah County Jail in Moscow, Idaho was conducted on August 6 - 8, 2018 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 IPREA Pre-Audit Questionnaire. The auditor reviewed documentation that included agency policies and procedures, forms, education materials, training curriculum, organizational charts, mission statements, posters, inmate handbooks, flyers, website information, and other IPREA related materials that were provided to demonstrate compliance with the IPREA 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 Detention Sergeant at the on-site audit. The IPREA Coordinator, Cpl. Kiri Alldredge and the Jail Administrator, Lt. Ron Manell were out of town and not present at the on-site audit. The auditor was assisted by Detention Sergeant Jason Alexander.

An entrance meeting was held with Sgt. Jason Alexander and Chief Deputy, Tim Besst, at 8:30 a.m. on August 6, 2018. Sgt. Alexander provided the auditor a list of all 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 secure perimeter from which to work and conduct confidential interviews of staff and inmates. Formal personal interviews were conducted with specialty staff, random facility staff, randomly selected inmates, and contract employees. The auditor interviewed a total of ten inmates who were randomly selected from nine housing units in the jail. There were no youthful, transgender, intersex, gay, lesbian, non-English speaking, or disabled inmates incarcerated 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. At the time of the audit, the facility was not conducting a risk screening at intake so the auditor did not have a list of inmates who reported a sexual abuse prior to incarceration in the facility. Inmates were interviewed using the recommended DOJ protocols that question their knowledge of a variety of IPREA protections, generally and specifically, their knowledge of reporting mechanisms available to inmates to report abuse or harassment. All of the inmates the auditor interviewed acknowledged that they had received training on IPREA at booking, or shortly after, explaining their right to be free from sexual abuse and sexual harassment, their right to be free from retaliation for reporting a sexual abuse or sexual harassment, and how to report a sexual abuse or sexual harassment. All inmates stated there are posters everywhere that explain their rights against sexual abuse and sexual harassment and how to report an incident. Many of the inmates stated that the staff treat them very well and are quick to respond to any problems.

The auditor interviewed seven staff members representing two shifts (two dayshifts, 7:00 a.m. to 7:00 p.m. and two nightshifts, 7:00 p.m. to 700 a.m.). No other staff members were available for interview as two were at the academy, one was at a class out of town, one was on vacation, and the Sergeant was in charge of assisting the auditor and was filling a day shift at the same time. The auditor also interviewed four specialty staff, including a shift supervisor, medical (contract staff), food services (contract), and investigative staff. Latah County Jail is a small facility so the detention deputies do all of the jobs in the facility and are not designated to individual specialty jobs. Also interviewed were the Chief Deputy and the Detention Sergeant. IPREA Coordinator, Kiri Alldredge, was interviewed by telephone on August 16 after the conclusion of the on-site audit. Staff were interviewed using the DOJ protocols that questions their IPREA 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 Gritman Medical Center in Moscow, Idaho. All staff were very knowledgeable about IPREA 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/IPREA training and the curriculum taught at the training to determine compliance with training mandates. The auditor also reviewed background check procedures for hiring and the list of detention staff who have had background checks at a minimum of every five years after hire. Case files for several inmates in the facility were reviewed in the administrative office to evaluate intake procedures, inmate education, and inmate signatures of acknowledgement. Classification records of inmate education, risk assessments, and housing decisions were also reviewed.

On August 7, 2018, the auditor toured the facility from 9:00 a.m. to 10:15 a.m. and was escorted by Jason Alexander, the Detention Sergeant. 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 for privacy. Toilets are inside the individual cells and housing units and some have metal barriers. The toilets have been blocked out on the cameras in some of the cells preventing camera view and staff of the opposite gender of the inmates announce entering the housing unit so inmates have a chance to alert them that they are using the toilet. A1, Holding, C2 and B1 have some view of the toilets either through the window or on camera. The Sergeant stated that they will remedy those views so inmates cannot be seen on the toilets. The auditor reviewed the camera views in the jail administrative office and verified that most of the toilets and all of the showers were blacked out and were not monitored by the cameras. The auditor noticed a blind spot in the kitchen where the view is obstructed when a person or persons go into the kitchen office. Sgt. Alexander stated that policy has been put into place that inmates cannot go into the office out of camera view. Notices of the IPREA audit were posted throughout the facility in the housing units and informal interviews with inmates stated they had been up for several weeks. 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 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 harassments.

Throughout the three days of the audit, the auditor reviewed questions noted on the auditor's compliance tool with Sgt. Alexander and reviewed additional documentation to verify compliance with the standards.

At the conclusion of the on-site visit, an exit meeting was held at 11:00 a.m. on August 8, 2018 between the auditor and Sgt. Alexander to discuss the audit findings and 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.

To enter the facility from the Sixth Street entrance, the person will come up to a chain link locked gate where the person will ask permission to enter via an intercom. After gaining access, there is a solid locked door approximately 10 ft away which puts the person inside the waiting area of the facility. From here the person would enter the secure area of the jail through another gate.

Once through the gate, the holding cell is to the left of the gate. The booking room is on the left approximately 9ft from the gate and the jail office/ control room is directly across the hall.

The jail has one main hallway from the jail office which goes around a center structure and can follow left or right when you leave the office. Either way a person walks, the person will always return to the office.

On the right side of the hall is the attorney's interview room and right next to that is the civilian side of visiting. Through a gate in the hallway, the inmate side of visiting is on the right. Next to that is a change over room and inmate clothing storage. There is a pass-through window into a shower room and bathroom which is also used to change out inmates. The last door on the right is a half door and it is a maintenance access to plumbing.

On the left side of the hall through the gate is cell A2 which is a six-person minimum security cell. A few feet from A2 is the library / laundry room.

At the end of this hall is an access to plumbing through a half door. On the left is a lockable gate into cell B1 catwalk. B1 is a ten-person cell. On the right is a solid lockable door that accesses cell B2 which is another ten-person cell.

After exiting these cell areas to the left is cell C1 on the left side of the hall. C1 is a maximum-security housing unit with four cells that can be locked down individually.

On the right side of this hall is the staff bathroom and then the jail kitchen. In the kitchen there is one main room and a small pantry/office at the back of the kitchen.

After exiting the kitchen, to the right, are four doors on the left side of the hallway. The first door is cell C2 which is a solitaire cell. The next room is a pantry and cold storage room. The third door is cell C3 which is another solitaire cell. The last door is the electrical, hot water tank, and fire sprinkler room.

There is one door on the right side on this wall, across from the electrical room, which is the janitorial room and paper supplies.

Continuing around the hallway there are four doors on the left side of the hallway and one slide gate. The first door goes into cell C4 which is a six-person cell normally used to house female inmates. After exiting that cell to the left is the gate and immediately to the left is the stairwell door which leads to the Sally Port and up to the Sheriff's office. The last door, just past the jail office/control room, is cell A1 which is a four-person ADA compliant cell.

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: 4

115.31, 115.42, 115.67, 115.73

Number of Standards Met: 39

115.11, 115.12, 115.14, 115.15, 115.16, 115.17, 115.18, 115.21, 115.22, 115.32, 115.33, 115.34, 115.35, 115.41, 115.43, 115.51, 115.52, 115.53, 115.54, 115.61, 115.62, 115.63, 115.64, 115.65, 115.66, 115.68, 115.71, 115.72, 115.76, 115.77, 115.78, 115.81, 115.82, 115.83, 115.86, 115.87, 115.89, 115.401, 115.403

Number of Standards Not Met: 0

Summary of Corrective Action (if any)

115.12(c) (d) requires the facility to develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring to protect inmates against sexual abuse. The Latah County Jail has done a good job of placing cameras around the building to prevent blind spots or changing policy to eliminate them. However, no formal staffing plan is in place in the facility. The facility will conduct a staffing analysis and develop a staffing plan for the facility and maintain documentation of the development process and the actual written staffing plan. This correction should be sent to the auditor within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

(e) requires implementing a policy and practice of having intermediate or higher-level supervisory staff conduct unannounced rounds on all shifts to identify and deter staff sexual abuse and sexual harassment on all shifts. The standard is in policy but is not done in practice. The Latah County Jail will begin conducting these unannounced rounds at least two rounds each shift each month and will send the documentation to the auditor within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

115.15(d) requires inmates may 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 including via the video camera. Some of the camera views in the Latah County Jail do show inmates using toilets and the monitors are in the administration office/control room where deputies of the opposite gender as the inmates may view them on the toilet. The Latah County Jail will go through all the camera views and black out the toilet areas that are on camera so inmates cannot be seen on the monitors when using the toilet. The Latah County Jail will also apply a frost treatment to a portion of the holding cell window so that the deputies can see only the inmate's upper body and head when the inmate is using the toilet and the deputy can back away from the window when the inmate is of the opposite gender as the staff member. Verification of these actions will be sent to the auditor within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

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 Latah 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 Latah 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 Latah 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.

Corrective Action Verified as Completed 1/28/19

115.22(b) requires the facility to publish on its website, or elsewhere the public can access, its policy regarding the referral of allegations of sexual abuse or sexual harassment for criminal investigation. The Latah County Jail has not published this policy on the Sheriff's website and has not made it otherwise available to the public. The Latah County Sheriff's Office will publish this information on its website, or elsewhere the public can access, such as in the lobby, and will advise the auditor of the location posted and send the auditor a copy of the notice for review. This will be done within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

115.33(b, c, e) requires the facility to provide comprehensive IPREA education within thirty days of intake. The Latah County Jail has this in their policy but doesn't have it in practice. The Latah County Jail will put into place a comprehensive training within thirty days of intake to inmates. The Jail will also verify that all inmates currently in the facility have had this training. And the Jail will revise the policy to match and detail what is done to provide this training. The Latah County Jail will send the amended policy and documentation confirming the thirty-day comprehensive training is being done, and all inmates have received it to the auditor within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

115.34(a and c) requires all administrative and criminal investigators conducting sexual abuse investigations in the Jail take a specialized training course for sexual abuse in a confinement setting. The administrative investigators took the classroom training the PRC presented but the criminal investigators have not taken the specialized training. The Latah County Sheriff's Office will have all of the criminal investigators take the NIC online course, "Investigating Sexual Abuse in a Confinement Setting" and will send verification of the completed training to the auditor within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

115.41(a, b, c, di, i) requires that all inmates receive a risk screening within 72 hours of intake to determine their risk of being sexual abused or sexually abusing others. It also requires strict controls over the access and dissemination of information in the risk screenings. Latah County Jail has not implemented this practice even though it is in policy and does not have an approved screening form. Latah County Jail will develop a risk screening form that has all of the elements listed in the standard and put into practice screening inmates within 72 hours of intake. Latah County Jail will also implement the practice of conducting a reassessment within 30 days of intake as required by their policy. And, Latah County Jail will develop a detailed policy and practice of how risk assessments will be securely stored with limited access after booking. Policy will indicate who has access to these risk assessments. This standard will be implemented as soon as possible and all current inmates in the facility will be screened as soon as it is implemented. Verification that the policy and practice are being done consistently will be sent to the auditor within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

115.42(a) requires that risk screening assessments be used to determine housing and programming assignments for all inmates to keep them safe. As mentioned in 115.41, Latah County Jail does not conduct a risk assessment screening at intake. Latah County Jail will develop an objective screening instrument that includes all elements required in the standards and will implement risk screening as soon as possible. The Jail will use the risk screening when making housing, bed, and programming assignments for all inmates. Documentation and verification that the risk screenings are being done and are standard procedures at booking and are being used to determine housing, bed, and programming assignments will be sent to the auditor within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

115.51(d) requires the facility to establish procedures for staff to privately report sexual abuse and sexual harassment of inmates and inform staff of these procedures. The Latah County Jail has outlined these procedures in policy but staff were not aware of what the policy says. The Latah County Jail will identify how staff will be informed of these procedures such as through yearly training. This information will be sent to the auditor within 180 days of the receipt of this interim report.

Corrective Action Verified as Completed 1/28/19

115.53 (a-b) requires the calls to the confidential support services be free and unmonitored and the inmates be provided with information on the extent of confidentiality between the group and the inmate. The inmates at the Latah County Jail were aware there were support services available but didn't know exactly what services they provided, what the extent of confidentiality was, or if the calls were free and unmonitored. The Latah County Jail will create posters for the housing units that explains the services provided, the extent of confidentiality, and that the calls are free and unmonitored. The Latah County Jail will also include the information in the thirty-day inmate education sessions when they are implemented. A copy of the poster will be sent to the auditor within 180 days of the receipt of this interim report.

Corrective Action Verified as Completed 1/28/19

115.54(a) requires the facility to distribute information to the public on how to report inmate sexual abuse or sexual harassment on behalf of the inmates. The Latah County Jail policy states that this information will be posted in the Sheriff's Office lobby but there is no posting. The Latah County Jail will post this information in the Sheriff's Office lobby as specified in its policy. A copy of the posting will be sent to the auditor within 180 of the receipt of this interim report.

Corrective Action Verified as Completed 1/28/19

115.63(d) requires that facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the IPREA standards. Latah County Jail does not have this in the policy. Latah County Jail will add this to its policy and will send the updated policy to the auditor within 180 of the receipt of this interim report.

Corrective Action Verified as Completed 1/28/19

115.71(b) requires all administrative and criminal investigators conducting sexual abuse investigations in the Jail take a specialized training course for sexual abuse in a confinement setting. The administrative investigators took the classroom training the PRC presented but the criminal investigators have not taken the specialized training. The Latah County Sheriff's Office will have all of the criminal investigators take the NIC online course, "Investigating Sexual Abuse in a Confinement setting" and will send verification of the completed training to the auditor within 180 days of the date of this interim report.

Corrective Action Verified as Completed 1/28/19

115.81(c) requires all inmates who disclose any prior sexual victimization during the risk screening are offered a follow-up meeting with a medical or mental health practitioner. Latah County does not conduct a risk screening so this question and offering of follow-up is not done. Latah County will begin conducting risk screening of sexual abuse by using an objective screening form. On the form will be the question of whether the inmate has ever been sexually abused and, if the answer is yes, the inmate will be offered a follow-up meeting with a medical or mental health practitioner. The offer of follow-up and the inmate's response will be documented on the screening form. The Latah County Jail will send documentation to the auditor within 180 days of the date of this interim report verifying that all inmates are being given a risk screening, every inmate who responded yes to the above question has been offered follow-up counseling, and the response of each of those inmates to the offer.

Corrective Action Verified as Completed 1/28/19

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 Latah County Jail has implemented a zero-tolerance policy as detailed in Policy 15.2 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 and descriptions of the agency strategies and responses to sexual abuse and harassment. And, the policy details what sanctions are imposed for those found to have participated in prohibited behaviors. The policy requires the IPREA Coordinator review the policy and practice, at a minimum, once a year to ensure that it remains current with best practices, legal decisions, and any change in the requirements of the Federal law. 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 IPREA Coordinator, Corporal Kiri Alldredge, to oversee policy and procedure development and operations in reference to sexual abuse and sexual harassment. The IPREA policy details the job tasks that the IPREA Coordinator is responsible for on a daily and yearly basis. The policy specifically states, "The IPREA Coordinator will be responsible for "Education of staff, volunteers, contractors, and inmates; developing, maintaining and updating procedures to identify, monitor, and track sexual contacts, assaults, harassment, and misconduct to comply with the IPREA standards; collaboration and coordination of social services for IPREA victims; organizing internal investigations and referring them to external investigations when necessary, ensure the proper collection, retention, analysis and destruction of records associated with claims of sexual abuse; compile records, maintain, complete, and report statistical data to the Department of Justice when requested, and notify the Jail Administrator of all allegations of sexual contact, assault, harassment, or misconduct." The IPREA Coordinator reports directly to the Latah County Jail Administrator, Lt. Ron Manell who, in turn, reports directly to the Latah County Chief Deputy, Tim Besst. Chief Deputy Besst reports directly to Sheriff Richard Skiles. Cpl. Alldredge indicated that she has sufficient time and authority to develop, implement, and oversee the agency's efforts toward IPREA compliance and Chief Deputy Besst confirmed that Lt. Manell, Sgt. Alexander, and Cpl. Alldredge have full support of the Sheriff's Office in all their efforts to bring the Latah County Jail into compliance with the IPREA standards.

115.11(c) The Latah County Sheriff's Office operates only one facility and, therefore, does not have an IPREA Compliance Manager.

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 and inmate interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Center Policy 15.2
Latah County Sheriff's Office Organizational Chart
Interview with Chief Deputy, Tim Besst

Interview with Sergeant Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA Coordinator
Interviews with random staff
Interviews with random inmates
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge

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 Latah 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 IPREA audit. This part of the standard is, therefore, not applicable to the Latah County Jail.

POLICY, MATERIALS, INTERVIEWS, AND OTHER EVIDENCE REVIEWED:

Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander

Standard 115.12: Supervision and monitoring

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

115.12 (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

115.12 (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

115.12 (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

115.12 (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.

115.12(c) The Latah County Jail does not have a formal staffing analysis or staffing plan in place. The average number of inmates incarcerated in the Latah County Jail during the twelve months prior to the audit was 30 and the informal, unwritten staffing plan was predicated on 30 inmates. The facility requires a minimum of two detention staff on each shift and tries to ensure that one of the two staff is a female. Because there is no formal, written staffing plan, the auditor finds that the Latah County Jail does not meet this part of the standard.

The Latah County Jail has installed a few new cameras around the building and has worked diligently to cover blind spots. The goal of the facility is to replace cameras as they are beginning to wear out and the facility will take into consideration any blind spots or areas where toilets can be viewed on camera when installing new cameras. One blind spot is a small pantry and office off the kitchen that was identified by detention staff and a camera is not practical in that area. People can be seen inside the door of the pantry but cannot be seen further into the pantry/office. The policy has been changed to alleviate the blind spot by not allowing inmates to go any further into the pantry than inside the door where they can be viewed on camera.

Sgt. Alexander confirmed there were no deviations of shift personnel from the staffing plan during the audit phase. The facility has in place procedures to ensure all positions are covered and there are never less than two deputies on shift.

115.12(d) There is no formal staffing plan so a staffing plan is not reviewed once a year to determine if it is adequate to meet the needs of the Latah County Jail and protect inmates from sexual abuse. Sgt. Alexander stated that they discuss every year if more staff are needed to operate the jail efficiently but no documentation of the review is kept. Therefore, the auditor finds that the Latah County Jail does not meet this standard.

115.12(e) The Latah County Jail has detailed in Policy 15.2 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. The policy states that “The documentation of these rounds will be logged on the Jail ARTS activity log and will be made available to the IPREA auditor as requested at the time of the audit”. The policy does prohibit staff from alerting other staff to when these rounds are being done. However, the rounds are not being done in practice or documented. Supervisors often conduct regular security checks in the jail but have not been conducting them specifically as an unannounced IPREA round. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.2
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Idaho Jail Standards
Schematic plan of where the cameras are placed
Informal interviews with staff during the audit tour
Formal interviews with random staff and intermediate or higher-level staff
Interview with Sgt. Jason Alexander
Latah County population report for 2017

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should conduct a staffing analysis to define how many staff should be hired to operate the Jail in an efficient and safe manner to protect against sexual abuse.
2. The Latah County Jail should develop a written staffing plan for the Jail that defines how many staff and supervisors are required on each shift and what camera technology is in place.
3. The Latah County Jail should document the development of the staffing analysis and the staffing plan.
4. The Latah County Jail should put into policy what will be reviewed annually in reference to the staffing plan and who will be included in the review.
5. The Latah County Jail should put into practice the unannounced supervisor rounds that is required by policy and this standard.
6. The Latah County Jail should maintain documentation of these rounds to verify they are done on each shift.

The corrective actions for this standard should be completed and sent to the auditor within 180 days of receiving this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 Latah County Jail conducted a staffing analysis in December of 2018 to define how many staff should be hired to operate the Jail in an efficient and safe manner to protect against sexual abuse.
2. The Latah County Jail developed a written staffing plan for the Jail which was dated January 1, 2019. The plan defines how many staff and supervisors are required on each shift and what camera technology is in place.
3. The Latah County Jail has documented the development of the staffing analysis and the staffing plan.
4. The Latah County Jail has put into policy what will be reviewed annually in reference to the staffing plan and who will be included in the review.
5. The Latah County Jail has added unannounced supervisor rounds to its jail management system and has begun to do the rounds on each shift.
6. The Latah County Jail maintains documentation of these rounds to verify they are done on each shift.

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

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 €

- 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 Latah County Jail has detailed in Policy 15.2 how a youthful inmate would be housed in the facility. Youthful inmates are rarely housed in the Latah County Jail but 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 Latah 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. Several months before the audit, a youthful inmate was housed for a short time in the Latah County Jail. The Jail kept the youthful inmate in a cell separate from others as this was the only youthful inmate in the facility. The Jail was approved by the Prosecutor and the Dept. of Juvenile Corrections to house the youthful inmate with 18 to 20 year-old inmates so the youthful inmate would have company. This violated the standard. Since this incident, policy and procedure has been implemented that will prevent youthful inmates in the future from being housed with adults. The auditor has reviewed the policy and interviewed staff and finds that the Latah County Jail now meets the standard.

115.14(b) Referring to Policy 15.2, the Latah 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€ The Latah County Jail has detailed in Policy 15.2 that the Jail will make its best efforts to avoid placing a youthful inmate in segregation to comply with this standard. Absent exigent circumstances, the facility does not deny youthful inmates daily large-muscle exercise or any legally required special education services while in the facility. The policy states that the Jail Administrator will arrange for a tutor to come to the facility regularly to assist the youthful inmate. The policy states that youthful inmates are given access to other programs and work opportunities to the extent possible. The youthful inmate that was housed in the facility was provided exercise opportunities separately from adults and was escorted to recreation by deputies but was not in the facility long enough to participate in education or programs.

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:

Latah County Jail Policy 15.2
Interview with Sgt. Jason Alexander
Interviews with random staff
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Latah County Jail Population Report for 2017

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 €

- 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 Latah County Jail Policy 15.2 details that cross gender strip searches and cross gender visual body cavity searches are prohibited except in exigent circumstances. Only medical practitioners can perform intrusive or invasive body cavity searches under all circumstances. There weren't any cross-gender strip searches done in the 12 months prior to the audit for the auditor to review.

115.15(b) The Latah County Jail Policy 15.2 states that cross gender pat down searches of female inmates by male staff are prohibited except in exigent circumstances. In the 12 months prior to the audit, no cross-gender pat down searches of female inmates were done. The policy states that if a cross gender pat down search must be done, the staff member will obtain supervisory permission before conducting the pat down search. Policy 5.2 and 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. Interviews with random staff also confirmed this

115.15€ The Latah County Jail Policy 15.2 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. There weren't any cross-gender searches done during the twelve months prior to the audit so the auditor had no documentation to review.

115.15(d) The Latah County Jail Policy 15.2 and practice ensures that inmates are able to shower, perform bodily functions, and change clothing with privacy. The policy details the exigent circumstances that would be required for staff of the opposite gender to deviate from this policy. 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. When inmates call back "Not Clear" the staff member goes on to another housing unit and returns when it is clear. Interviews with inmates and staff confirm this is policy and actual practice of the policy on a consistent basis. Interviews with inmates confirmed that the deputies are very considerate and respectful of their privacy when entering the housing units. Some inmates who were interviewed expressed concern over cameras being able to view the toilets.

The auditor did notice that some of the cameras in holding and housing units did view the toilets. The holding cell also has a large window where the inmate can be easily seen using the toilet during rounds. Sgt. Alexander stated that the inmates in holding can be given a sheet to cover themselves when using the toilet or can ask to use a private toilet but there were no signs advising the inmate of this. He also stated that sheets can be given to inmates in A1, B1, B2, and C2 when using toilets that can be viewed by the cameras. However, sheets for cover was not standard practice at the time of the audit. The auditor finds that the Latah County Jail does not meet this part of the standard.

Note: Sgt. Alexander was already blacking out toilets on cameras while the audit was in progress and was determined to have that be top priority.

115.15€ Latah 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 Latah County Jail provides training during the Field Training Program of new hires on how to conduct cross gender pat down searches and searches of transgender and intersex inmates in a professional manner and, deputies receive the training during the Basic Detention Academy at P.O.S.T.

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

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.2
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander
Interviews with random inmates and staff
IPREA training curriculum

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should put in measures to block out all camera views of toilets that inmates use.
2. The Latah County Jail should put in measures to block the view of the toilet from the window to the holding cell in the hall.

All corrective action should be completed and verification sent to the auditor within 180 days of the date of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 Latah County Jail will have new cameras installed in June of 2019. In the meantime, they are giving the inmates sheets to cover themselves when using the toilet or will move them to a private toilet to use upon request.
2. The Latah County Jail has added tint to the holding cell window to block the view of someone using the toilet.

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

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 Latah County Jail Policy 15.2 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. The policy states that, "The agency will provide the following: inmate handbook, interpreters, access to a language line, and staff explaining the information one-on-one to inmates who are illiterate or who are unable to read the information themselves. The agency will regularly check sources such as the language line, interpreters, etc. to make sure they are continuously available when needed." The Latah County Jail has an agreement with a language line to provide interpretation services to those inmates who do not speak English. There is also a university in the city that has language interpretation classes that can be called for help. All detention deputies have access to the language line and the instructions are in the booking room. The Latah County Jail will locate someone who can effectively communicate with inmates with psychiatric, intellectual or speech disabilities such as a Mental Health practitioner. The dispatch supervisor provided two contact numbers for Idaho Relay for the Deaf and one contact number for Sorensen Video Relay Service to communicate with the deaf, when needed. Sgt. Alexander explained that the Jail has the capability of making posters in large print and staff reading information to inmates who are blind or have low vision or who are illiterate.

All staff receive yearly training on PREA compliant practices for inmates through watching NIC PREA videos. The videos address working with inmates with disabilities and limited English proficient inmates within the curriculum. There were no inmates with disabilities or inmates who do not speak English in the facility at the time of the audit.

115.16(b) Latah County Jail Policy 15.2 prohibits the facility from using inmate interpreters, readers, or other inmate assistants to assist other inmates in reporting a sexual abuse or sexual harassment 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 12 months where inmate interpreters have been used to assist other inmates. 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 have been used.

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 and inmate interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.2
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander
Interviews with random facility staff
Email from Dispatch providing contact numbers for interpreters for the deaf
Yearly IPREA training curriculum for staff

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) Latah County Jail Policy 15.2 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 background 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 Latah 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 Latah 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, five people have been hired who have contact with inmates and they all have had extensive background and criminal history checks completed prior to their hiring.

115.17(d) Latah County Jail Policy 15.2, 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 Latah County Sheriff's Office has conducted criminal background record checks on two contract employees (100%) who have been hired and have contact with inmates.

115.17(e) Latah County Jail Policy 15.2 requires a criminal background records check on all employees every five years. Documentation provided at the audit confirmed that the Latah County Sheriff's Office is completing a criminal background records check on all current employees and contractors at least every five years. These background records checks are done at the same time for all detention employees and contractors.

115.17(f) The Latah County Jail Policy 15.2, states, "The Sheriff's Office will ask all applicants and employees who may have contact with inmates directly about previous misconduct, as described above, in either written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. Employees have a continuing affirmative duty to disclose any such misconduct". However, Sgt. Alexander explained that the question is not on the application. And, Sgt. Alexander disclosed that there is nothing specific in the procedures for hiring or promotion interview boards. Therefore, the auditor finds that the practice does not match the policy and the Latah 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 Latah County Jail Policy 15.2 states that material omissions regarding such misconduct or provision of materially false information shall be grounds for termination.

115.17(h) Policy requires the Latah 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 request is forwarded to the Sheriff, or designee, to provide the response. The Latah 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:

Latah County Jail Policy 15.2
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander
Idaho P.O.S.T. IDAPA Rules
Idaho Jail Standards
List of employee background records checks

CORRECTIVE ACTION REQUIRED:

1. The Latah 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.
2. The Latah 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 January 23, 2019, the Latah 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 Latah County Jail has amended its policy to identify specifically when to ask all applicants and employees who may have contact with inmates directly about previous sexual misconduct.
2. The Latah County Jail asks applicants for hiring and promotions the question in the hiring and promotion boards.

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 Latah County Jail hasn't had any acquisitions of new facilities or substantial expansions or modifications of the current Jail since it was built.

115.18(b) The Latah 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, holding cells, support services areas, and internal entrances into the building. One new fisheye camera was installed in the holding cell and one was installed in Cell A1. The Jail plans on replacing cameras with fisheye cameras as they start to have problems with them. The fisheye cameras have the ability to be programmed with black out capabilities for toilets or other areas that need to be protected from view on the monitors.

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 submitted by Cpl. Kiri Alldredge
Description of camera placement throughout the facility
Interview with Sgt. Jason Alexander
Interview with Chief Deputy, Tim Besst

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 Latah County Sheriff's Office and Latah County Jail follow the Uniform Evidence Collection protocol contained in their Lexipol policy and procedure. This protocol is used by the Latah County Detective Division when conducting criminal investigations inside and outside the Jail. The protocol is developmentally appropriate for youth but youthful inmates are rarely held in the facility. The Latah County Jail takes inmates to Gritman Medical Center in Moscow, Idaho for forensic exams and the Medical Center has its own uniform evidence collection protocol used for sexual assault exams. Gritman Medical Center faxed their protocol to Sgt. Alexander who provided the auditor with the document. This information is based on the policy as there were no forensic medical examinations performed during the twelve months prior to the audit.

115.21(c) Latah County Jail Policy 15.3 states that all victims of sexual abuse are offered access to forensic medical examinations where evidentiary or medically appropriate. Sgt. Alexander explained that these exams will normally be done at Gritman Medical Center in Moscow, Idaho. The policy states there is no financial cost to the victim. 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 Latah County Jail is actively working on an MOU with Alternatives to Violence of the Palouse, located in Moscow, Idaho to provide rape crisis and advocacy services to victims of sexual assault. Alternatives to Violence of the Palouse has a 24/7 crisis hotline that inmates can call free of charge and the calls are not recorded. This information is given to inmates and interviews with the majority of inmates confirmed they know that counseling and therapy is available and is free of charge. An interview with an administrator of Alternatives to Violence of the Palouse confirmed they are willing to provide services to the Latah County Jail inmates and are in the process of creating the MOU.

115.21(e) The Latah County Jail Policy 15.3 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. 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 Latah County Jail only has an outside agency conduct the investigation if the allegation involves staff or when the Sheriff feels it is necessary to go outside the Sheriff's Office. All investigations that allegedly involve staff or are a conflict of interest are referred outside the agency, by Sheriff Richard Skiles, to the Moscow Police Department or to Idaho State Police. The Latah County Jail's Policy requires the outside agency to follow the requirements in (a) through (e) of this standard and the Latah County Sheriff's Office will document the request to the assisting agency to follow these requirements. All IPREA complaints are investigated for possible criminal activity and the Latah County Sheriff's Office and the Moscow Police Department maintain a close working relationship with the County Prosecutor.

The auditor relied on the policies to find this standard in compliance as there were no allegations of sexual abuse of inmates during the twelve months of the audit cycle so there were no documents or investigations to review.

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 and inmate interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.3
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Chief Deputy, Tim Besst
Interview with Sgt. Jason Alexander
Interview with administrative and criminal investigators
Lexipol Uniform Evidence Protocol

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 - b) The Latah 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 Latah County Detective Division who have three investigators. All investigations that allegedly involve staff are referred outside the agency, generally to the Moscow Police Dept. The investigator(s) from the Moscow Police Dept. will be asked to take the specialized training for investigations in a confinement setting and their response will be documented.

All IPREA complaints are investigated for possible criminal activity and the Latah 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 Latah County Jail for further administrative investigation, (excluding internal investigations of staff) and disciplinary sanctions, if warranted. The Latah County Jail reported that one allegation of sexual harassment of inmate-on-inmate was reported during the twelve months preceding the audit. The investigation was completed as an administrative investigation and the auditor reviewed the investigation paperwork. No allegations of sexual abuse were reported during the twelve months prior to the audit.

Agency policy regarding the referral of allegations of sexual abuse and sexual harassment to an agency with the legal authority to conduct criminal investigations unless the allegation does not involve potentially criminal behavior is not published on the agency's website or available to the public by other means as required by the standard and the Latah County Jail policy. The Jail reported that the public can obtain the information through a public records request which is not sufficient as the public would have no idea to ask for the information. Therefore, the auditor finds that the Latah County Sheriff's Office and Jail do not meet this part of the standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.3
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Latah County Sheriff's Office website: www.latah.id.us/sheriff
Interview with Chief Deputy, Tim Besst
Interview with Sgt. Jason Alexander
Interviews with Latah County Sheriff's administrative investigators and criminal investigators

CORRECTIVE ACTION REQUIRED:

1. The Latah County Sheriff's Office and Jail should publish on its website or other means, the agency policy regarding the referral of allegations of sexual abuse and sexual harassment.

This policy should be published on the website, or provided elsewhere to the public, within 180 days of the date of this interim report for the auditor to review and write the final report after the 180 days corrective action period.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 10, 2019, the Latah 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 Latah County Jail has posted the agency policy regarding the referral of allegations of sexual abuse and sexual harassment in the lobby of the Sheriff's Office.

The auditor has reviewed all of the documents and photographs that were sent and the Latah 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 - b) The Latah County Jail Policy 15.4 requires that employees receive training on the ten topics listed in the standard on a yearly basis. Employees are required to watch the NIC videos, "Responding to Prisoner Rape", and "Facing Prison Rape" annually. Staff also receive frequent training on IPREA policy changes. All training is documented as to the specific information taught and employees sign that they received and understand the training they received. Interviews with random staff revealed that the staff have extensive training on IPREA and are very knowledgeable on the topics. Because the facility provides full and ongoing IPREA training yearly instead of every other year, the auditor finds that the facility exceeds this part of the standard.

115.31(c) The training is tailored to the gender of the inmates at the Latah 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(d) IPREA refresher training that reviews all of the requirements of IPREA is provided to employees every year instead of every other year. Staff also receive ongoing IPREA training throughout the year with policy changes or standards updates. Because the facility provides full and ongoing IPREA training yearly instead of every other year and extra training each year, the auditor finds that the facility exceeds this part of the standard.

115.31(e) 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 yearly training in IPREA.

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 exceeds the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.4
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
PREA Training Videos
Staff Acknowledgement form and signatures of receiving the training
Interview with Sgt. Jason Alexander
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) The Latah County Jail Policy 15.4 requires all volunteers and contractors who may have contact with inmates be trained on IPREA requirements. Twenty-eight volunteers, ten medical contract employees, and two kitchen contract employees who have contact with inmates have been trained in IPREA requirements during the last twelve months. This totals 100 % that have been trained.

115.32(b) The training for volunteers consists of all volunteers reading an IPREA informational sheet that explains the agency's policy of zero-tolerance regarding sexual abuse and sexual harassment, how to report such incidents, and their responsibilities under the department's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Once they are done reading the sheet, they sign it indicating they understand the training and their responsibilities under IPREA.

Contractors are required to take the same training as staff annually which consists of watching the NIC videos, "Responding to Prisoner Rape", and "Facing Prison Rape"

115.32(c) All volunteers and contractors are required to sign they have had the training and they understand the training they have received.

There were no volunteers on site at the time of the audit. One medical contract staff member and one kitchen contract staff member were interviewed and compliance was found with this standard.

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:

Latah County Jail Policy 15.4
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
IPREA Training Videos
Volunteer IPREA Informational sheet with signatures

Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA Coordinator
Interview with medical contract staff member
Interview with kitchen contract staff member

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) The Latah County Jail reports that 779 inmates have been admitted in the past twelve months to the facility and all have been provided with information during the intake and booking process on IPREA. All inmates in the Latah 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 inmate signs that he or she has received this information. An inmate handbook is given to the inmate that has IPREA information in it. Interviews with inmates confirmed that the received education on IPREA at booking and the inmates were able to tell the auditor what the policies are for zero tolerance, how to report a sexual abuse or sexual harassment. and that the facility offers support services to inmates who have been victims of sexual abuse.

115.33(b and c) The Latah County Jail does not provide any comprehensive IPREA education to inmates within 30 days of intake. The policy states that it is done but it is not done in practice. Therefore, the auditor finds that the facility does not meet this part of the standard.

115.33(d) The Latah County Jail ensures that key information is continuously available to inmates through posters, flyers, and inmate handbooks. IPREA posters are displayed in the dayrooms with the abuse hotline number by the phones.

All staff at the Latah County Jail have access to a language line to assist in the IPREA education of inmates at booking who do not speak English. Staff will read the information on the IPREA Informational sheet to those inmates who are illiterate, have low vision, or who are blind. The Jail also has access to interpreters for the deaf through Idaho Relay for the Deaf and Sorensen Video Relay Service. The jail will contact a mental health worker to come to the facility and assist in education for those who have psychological problems.

Interviews with random inmates revealed that the majority of inmates are retaining the information they are provided through the intake process, handbook, posters and flyers. All of the interviews with inmates confirmed that they received training and information on IPREA at booking. All stated that information is posted in the housing unit, and is in the inmate handbook on how to report a sexual abuse or sexual harassment. All knew they could access a hotline number on the phone. The majority knew there was a counseling service available. All knew there were ways to report an incident outside the facility such as the PREA hotline, their attorneys, and friends or families. The majority of the inmates praised the staff of the Latah County Jail and felt that the staff would react immediately and efficiently to complaints of sexual abuse or sexual harassment. An interview with an inmate who had reported sexual harassment revealed that the inmate believed the staff had handled the incident with professionalism and integrity and complimented the staff on how well the inmates are treated in the facility.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.4
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Inmate Handbook
PREA pamphlets displayed in housing units
PREA Posters displayed in housing units
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, PREA Coordinator
Interviews with random inmates
Interviews with facility intake staff

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should provide comprehensive IPREA education to inmates within thirty days of intake.

2. The Latah County Jail should document these education sessions.
3. The Latah County Jail should provide this comprehensive education to all inmates who are currently in the facility to verify all have this education.
4. The Latah County Jail should verify that the policy matches practice in the thirty day comprehensive education and detail what is done every thirty days.

All corrective action should be sent to the auditor within 180 of the date of the interim report so that a final report can be issued.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 Latah County Jail has implemented the practice of providing comprehensive IPREA education to inmates within thirty days of intake by the staff or IPREA Coordinator meeting with inmates on the 15th of every month.
2. The Latah County Jail documents these education sessions.
3. The Latah County Jail has provided the comprehensive education to all inmates who are currently in the facility.
4. The Latah County Jail has revised the policy so that it matches what is done in practice for comprehensive education every thirty days.

The auditor has reviewed all of the documents and photographs that were sent and the Latah 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 Latah County Jail Policy 15.4 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.

Two administrative investigators in the Latah County Jail have taken the PRC classroom course and conduct all administrative investigations into allegations of sexual misconduct and sexual harassment in the Jail. Three criminal investigators in the detective division have not yet taken the specialized training. Therefore, the auditor finds that the Latah 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 Latah County Sheriff's Detective Division have had training in sexual abuse investigations for their job requirements and are very familiar with the proper use of Miranda and Garrity warning and evidence collection as they use them frequently in their job duties. However, they have not taken the specialized training for conducting sexual abuse investigations in a confinement setting. Therefore, the auditor finds that the Latah County Jail does not meet this standard.

115.34(c) The auditor reviewed the Certificates of Completion for the administrative investigators who took the classroom course of the investigator's specialized training. The criminal investigators have not taken the course so there were no certificates or records to review. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.4
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Objectives for the online course, "Investigating Sexual Abuse in a Confinement Setting"
Training documentation for administrative investigators completing the classroom course
Interviews with facility administrative and criminal investigators
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA Coordinator

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should have the criminal investigators take the NIC online course, "Investigating Sexual Abuse in a Confinement Setting"

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 criminal investigators for the Latah County Jail have successfully completed the NIC online course, "Investigating Sexual Abuse in a Confinement Setting".

The auditor has reviewed all of the documents and photographs that were sent and the Latah 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 Latah County Sheriff's Office contracts with Ivy Medical, to provide on-site medical care at the facility. A nurse is on duty one day a week in the morning and the Medical Provider comes to the facility once a week. Inmates who need mental health care see the doctor first and then are referred to Health and Welfare for mental health counseling. An interview with a contract medical nurse confirmed that they are provided in-depth training on their responsibilities under IPREA through Ivy Medical and Nez Perce County Detention Center. Nurses work at both Nez Perce and Latah County. Specialized training includes the four elements required by this IPREA standard.

115.35(b) The medical contractor does not conduct forensic exams at the Latah County Jail. Victims of sexual abuse are transported to Gritman Medical Center in Moscow, Idaho for the exam, when medically appropriate.

115.35(c - d) The contracting agency maintains documentation that all medical practitioners who work at the facility have received specialized training provided by the contracting agency and Nez Perce County as listed in (a) of this standard.

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:

Latah County Jail Policy 15.4
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Facility Nurse
Interview with Sgt. Jason Alexander

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 - b) Latah County Jail Policy 15.5 requires that within 72 hours of being booked, victim/perpetrator screening will be conducted to determine an inmate's risk of being sexually abused by other inmates or being sexually abusive toward other inmates. The Latah County Jail reported that 763 inmates have entered the facility within the past twelve months with a length of stay over 72 hours. None of these inmates have had a risk screening. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

115.41(c - d) A risk assessment instrument was sent to the auditor but has never been approved or implemented. All ten of the topical areas of information are listed in the policy but not all are on the proposed screening form. The proposed form does not have (1) the inmate has a mental, physical, or developmental disability; (2) the age of the inmate; (3) the physical build of the inmate; ((5) whether the inmate's criminal history is exclusively non-violent; (9) the inmate's own perception of vulnerability; (10) whether the inmate is detained solely for civil immigration purposes. The auditor finds that the Latah County Jail does not meet this part of the standard.

115.41(e) The proposed screening instrument does not consider prior convictions for violent offenses, history of prior institutional violence or sexual abuse as known to the agency. The policy states that the Jail will screen for prior convictions for violent felonies, prior convictions for sex offenses, prior violent acts in custody, and prior incident of sexual abuse in custody but does not have them on the screening form. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

115.41(g) Latah County Jail Policy 15.5 also requires that an inmate's risk level be reassessed within 30 days of intake by a deputy but this is not being done in practice. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

115.41(h) The policy prohibits the Latah County Jail from disciplining inmates for refusing to answer any questions referring to sexual abuse or for not disclosing complete information on the screening questions listed in this standard. The standard only requires that inmates are never 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. Because of this policy of not disciplining inmates for refusing to answer any questions referring to sexual abuse or not disclosing complete information on any questions during the screening process, the auditor finds that the Latah County Jail exceeds this part of the standard in policy.

115.41(i) Policy 15.5 states that information in the risk screening form contains sensitive information and staff are prohibited from using the information to the detriment of the inmate. The policy further states that staff will face disciplinary action if this happens. However, the Latah County Jail has not implemented inmate risk screening and does not have explicit policy dictating how access to this information, when collected, will be strictly controlled. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.5
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Proposed Objective Risk Screening Instrument
Interviews with random staff
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA Coordinator

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should implement the practice of conducting a risk screening of inmates within 72 hours of intake as required by the policy.

2. The Latah County Jail should add the following to the proposed screening form, (1) the inmate has a mental, physical, or developmental disability; (2) the age of the inmate; (3) the physical build of the inmate; ((5) whether the inmate's criminal history is exclusively non-violent; (9) the inmate's own perception of vulnerability; (10) whether the inmate is detained solely for civil immigration purposes.
3. The Latah County Jail should revise the proposed screening form to include screening for prior convictions for violent felonies, prior convictions for sex offenses, prior violent acts in custody, and prior incident of sexual abuse in custody.
4. The Latah County Jail should use the screening form after it has been revised and approved.
5. The Latah County Jail should conduct a reassessment of risk screening within 30 days after intake as the policy requires.
6. The Latah County Jail will conduct a risk assessment of all inmates currently in the facility as soon as possible upon receipt of this interim report.
7. The Latah County Jail should develop a procedure of securing the risk assessments and indicate who should have access to the risk assessments after the booking process.

The Latah County Jail will complete the corrective action and send the verification documentation of successful completion to the auditor within 180 days of the date of this interim report. Once all corrective action is completed satisfactorily, the Latah County Jail will exceed this standard because of 115.41(h)

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 10, 2019, the Latah 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 Latah County Jail has implemented the practice of conducting a risk screening of inmates within 72 hours of intake as required by the policy.
2. The Latah County Jail has added to the screening form, (1) the inmate has a mental, physical, or developmental disability; (2) the age of the inmate; (3) the physical build of the inmate; ((5) whether the inmate's criminal history is exclusively non-violent; (9) the inmate's own perception of vulnerability; (10) whether the inmate is detained solely for civil immigration purposes.
3. The Latah County Jail has revised the screening form to include screening for prior convictions for violent felonies, prior convictions for sex offenses, prior violent acts in custody, and prior incident of sexual abuse in custody.
4. The Latah County Jail is now using the screening form to conduct risk screenings on all inmates at intake.
5. The Latah County Jail is conducting reassessments of risk screening within 30 days after the intake as the policy requires.
6. The Latah County Jail conducted risk assessments on all of the inmates in the facility shortly after the interim report was received.
7. The Latah County Jail has developed a procedure of securing the risk assessments. Upon completing assessments, deputies save the file into a secure folder and only Lt. Manell, Sgt. Alexander, and Cpl. Alldredge have access to the risk assessment form in the folder.

The auditor has reviewed all of the documents and photographs that were sent and the Latah County Jail is now fully compliant with this 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 Latah County Jail Policy 15.5 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. However, no risk screening is currently being done. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

115.42(b) Classification deputies make individualized determinations of how to ensure the safety of each inmate through interviews and considering the history. No risk assessment is done or used for these individualized determinations.

115.42(c) The Latah County Jail Policy 15.5 requires that Classification Officers 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. The Jail is a small facility but has several housing units that allow flexibility in housing assignments.

115.42(d) Policy 15.5 requires that at least monthly beginning with the intake date, a reassessment will be completed on all transgender and intersex inmates to review any threats of safety experienced by the inmate. Because of the reassessment being done at least monthly rather than at least twice a year, the auditor finds the Latah County Jail exceeds this 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 when making housing, bed, and programming assignments. This is reflected in both policy and practice. The facility has not had any transgender or intersex inmates in the last twelve months so the auditor is relying on the policy and interviews to determine compliance.

115.42(f) Policy15.5 states that transgender and intersex inmates will be allowed to shower separately from other inmates. Sgt. Alexander explained that they will be taken to the change out room to use the shower.

115.42(g) The Latah County Jail Policy 15.5 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 Latah County Jail is under no such legal restriction.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.5
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge

Proposed Objective Screening Instrument
Interviews with random staff
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA Coordinator

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should develop a comprehensive risk screening instrument as explained in 115.41 and implement it in a timely manner.
2. The Latah County Jail should use the risk screening when making housing, bed, and programming assignments for all inmates.

The Latah County Jail will send documentation to the auditor within 180 days of the date of this interim report that the corrective action has been completed.

Once all corrective action is completed satisfactorily, the Latah County Jail will exceed this standard because of 115.42(d)

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 Latah County Jail has developed a comprehensive risk screening instrument that contains all of the elements required in 115.41.
2. The Latah County Jail is using the risk screening form for all inmates in the facility when making housing, bed, and programming assignments for inmates.

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

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 Latah County Jail Policy 15.5 prohibits staff from placing inmates at high risk for sexual victimization in involuntary segregated 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 segregation for a time period, not to exceed 24 hours, in order to complete the assessment and find appropriate housing. Interviews with random staff and inmates revealed no incidents of involuntary housing being used for this purpose at the time of the audit or within the twelve months prior to the audit.

115.43(b) The policy requires any inmates placed in involuntary segregated housing have access to programs, privileges, education and work opportunities to the extent possible. If opportunities are restricted, staff will document which opportunities have been limited, the duration of the limitation, and the reasons for the limitations.

115.43(c) If no alternative housing can be found immediately, the inmate may normally be held in involuntary segregated housing for no more than 30 days.

115.43(d) The involuntary restricted housing of an inmate will be documented and will detail staff's basic concern for the inmate's safety, the reason why no alternative means of separation can be achieved, and the reason why the 30 days may need to be extended, if it does.

115.43(e) If an involuntary segregated housing assignment is made, a status review of the inmate by the Classification Officer 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:

Latah County Jail Policy 15.5
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Proposed Objective Risk Assessment Instrument
Idaho Jail Standards
Interviews with random staff and inmates
Interview with Sgt. Jason Alexander

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 Latah County Jail Policy 15.6 clearly outlines multiple ways for inmates 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. Four ways to report within the facility are listed in policy and there are two ways to report a sexual abuse or sexual harassment outside the agency listed in the policy. The reporting methods within the facility include verbally telling a Detention Deputy or staff, Medical Staff, confidential legal letter to the Sheriff and dialing #9 on the phone. Written methods are a kite to staff or medical, personal letter to any staff, and a personal letter addressed to administration. All methods are listed in the housing units for inmates to see. Most of random inmate interviews confirmed that they are aware of all of the ways to report.

115.51(b) The Latah County Jail has provided two methods for inmates to report outside the facility. Inmates can report on a hotline on the inmate phones that goes to the phone company who contacts the agency when they get a report of sexual abuse or sexual harassment. The facility also notifies inmates they can contact a family member, friend, attorney or anyone else outside the agency that they feel comfortable calling. 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 and relevant officials of the Department of Homeland Security. Inmates have access to phones in their cells and policy allows for free phone calls to contact the reporting hotline and the advocacy agency.

115.51(c) The Latah County Jail Policy 15.6 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.

115.51(d) The Latah County Jail has a policy on who staff can privately report to. 15.6 states that a staff member or volunteer may make a report directly to the facility's IPREA Coordinator either by writing or verbally, who shall, if requested, keep confidential the identity of the staff member or volunteer. Interviews with staff revealed that they all feel comfortable reporting to anyone in the Chain of Command but staff did not know what was required by policy. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

Interviews with staff and inmates clearly demonstrate they are very knowledgeable about IPREA and the variety of methods to report sexual abuse and sexual harassment of inmates.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
IPREA Inmate Acknowledgement Form and random signatures
IPREA flyers and posters
Interviews with random inmates
Interviews with random facility staff
Interview with Sgt. Jason Alexander

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should identify how staff will be informed of the procedures for privately reporting a sexual abuse or sexual harassment of inmates.

When the corrective action is completed, the Latah County Jail will send the verification documents to the auditor within 180 days of the date of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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. Staff have been trained in the IPREA policy to know how to report privately sexual abuse or sexual harassment of an inmate. This will also be taught during the yearly IPREA training in the future.

The auditor has reviewed all of the documents and photographs that were sent and the Latah 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 Latah 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.

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:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander

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 Latah County Jail is actively working on an MOU with Alternatives to Violence of the Palouse 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. The MOU is being reviewed by the Prosecutor's Office. The information for Alternatives to Violence of the Palouse is posted in the pamphlet given to inmates and interviews with random inmates revealed that inmates were aware there were advocacy services available but most had no idea if the calls were free or unmonitored, what services the group provides, or the extent of confidentiality they would have talking to the group. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

The Latah County Jail Policy 15.6 enables communication between the advocate and the victim in as confidential manner as is possible.

115.53(b) Prior to giving the inmate access to the advocate, the Latah County Jail Policy 15.6 states that the agency explains to the inmate the extent that the communication will be monitored. The advocate is offered free of charge to the inmate but inmates were not aware of this. The facility will also explain to the inmate that information may be relayed from the victim advocate in order to initiate and an investigation into the sexual abuse allegation in accordance with mandatory reporting laws. However, this is in policy but no information on monitoring or information about communication is provided to the inmates. Therefore, the auditor finds that the Latah 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:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Proposed MOU between Alternatives to Violence of the Palouse and the Latah County Jail
IPREA informational pamphlet
Interviews with random inmates
Interview with Sgt. Jason Alexander

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should provide the information to the inmates that the calls to Alternatives to Violence of the Palouse are toll-free and are unmonitored.
2. The Latah County Jail should provide the information to the inmates on what services Alternatives to Violence of the Palouse provides.
3. The Latah County Jail should provide information to the inmates on the extent of confidentiality

between Alternatives to Violence of the Palouse and the inmate.

4. The Latah County Jail should add all the information to the thirty-day inmate education sessions when they are implemented.

When posters have been created to reflect the above information, a copy of the poster should be sent to the auditor within 180 days of the date of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 Latah County Jail has added the information on the posters in the housing units that the calls to Alternatives to Violence of the Palouse are toll-free and are unmonitored.
2. The Latah County Jail now provides information to the inmates on what services Alternatives to Violence of the Palouse provides.
3. The Latah County Jail now provides information to the inmates on the extent of confidentiality between Alternatives to Violence of the Palouse and the inmate.
4. The Latah County Jail has added all the information to the thirty-day inmate education sessions.

The auditor has reviewed all of the documents and photographs that were sent and the Latah 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 Latah County Jail allows third parties to report a sexual abuse or sexual harassment incident on behalf of an inmate. Policy 15.5 states that "the facility shall publicly distribute information on how to report sexual abuse and sexual harassment on behalf of an inmate via a pamphlet readily available in the Sheriff's Office Lobby". However, the information is not posted in the Sheriff's Office lobby. Therefore, the auditor finds that the Latah County Jail does not meet this standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should post the information on how to report sexual abuse and sexual harassment on behalf of an inmate in the Sheriff's Office lobby as described in policy.

A copy of this notice should be sent to the auditor within 180 days of the date of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 Latah County Jail has created a poster on how to report sexual abuse and sexual harassment on behalf of an inmate and has posted the poster in the Sheriff's Office lobby.

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

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 Latah County Jail Policy 15.6 requires staff to immediately report to the Supervisor any suspected or alleged sexual abuse or sexual harassment that occurred in a facility whether or not it is part of the agency. The policy also states that staff are required to report to the Supervisor any retaliation against inmates or staff who report an incident and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Staff are required to write a report of the incident and forward it to the IPREA Coordinator and jail administration before the employee goes off shift. Interviews with random staff confirmed that they are aware of this policy.

115.61(b) Policy 15.6 prohibits staff from revealing any information related to a sexual abuse or sexual harassment report except as necessary to facilitate any investigation of the report and any administrative criminal proceedings. Interviews with random staff confirmed that this information is included in the yearly IPREA training.

115.61(c) Interviews with a Medical Practitioner within the facility confirmed the policy and practice that they 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. Interviews with the Medical Practitioner revealed they knew the practice and also received the information in their IPREA training.

115.61(d) If the alleged victim is under the age of 18, the Latah County Jail reports the allegation of sexual abuse to the Idaho Department of Health and Social Services. If the alleged victim is a "vulnerable adult", the report will be made to Idaho's Adult Protection Services and if the alleged victim is a child under the age of 18, the report will be made to Idaho's Child Protective Services. Interviews with random staff confirmed they were aware of this reporting requirement.

115.61(e) The Latah County Jail requires that all reports of allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, are referred to the facility's designated investigators. Interviews with random staff confirmed that they are aware of this reporting requirement.

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:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Eldredge
Interviews with random staff
Interview with a Medical Practitioner
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA 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 Latah 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 immediately removed from the housing unit and reassigned to other appropriate housing that ensures the inmate's safety or the perpetrator is immediately reassigned to another housing unit, depending on the circumstances of the situation.

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:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interviews with random staff
Interview with Chief Deputy, Tim Besst
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA 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 Latah County Jail 15.6 requires the Jail Administrator or Sheriff to report any sexual abuse allegation received regarding an inmate abused at another facility to the agency head where the sexual abuse is alleged to have occurred. The Latah County Jail reports that no reports of this type were received during the audit cycle.

115.63(b) Policy requires this notice to occur as soon as possible but, in no case, will the report be made later than 72 hours after the allegation has been received.

115.63(c) The notification from the Latah County Jail or Sheriff to the other agency is documented.

115.63(d) Latah County Jail policy does not address what process is in place when allegations are received from another facility of an inmate being sexually abused or sexually harassed in the Latah County Jail. Interviews with Chief Deputy, Tim Besst and Sgt. Jason Alexander explained what would be the response and actions but there is nothing in policy. Therefore, the auditor finds that the Latah County Jail does not meet this standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Chief Deputy, Tim Besst
Interview with Sgt. Jason Alexander

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should add to its policy how the facility would address a report from another county that an inmate was alleging sexual abuse while housed in the Latah County Jail and what actions would be taken.

The Latah County Jail will send the amended policy to the auditor within 180 days of the date of this interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 Latah County Jail has added to its policy how the facility would address a report from another county that an inmate was alleging sexual abuse while housed in the Latah County Jail and what actions would be taken.

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

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 Latah County Jail Policy 15.6 outlines in policy the responsibilities of all staff members receiving an allegation of sexual abuse. The policy details in depth the following guidelines for the first responder:

(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.

The Latah County Jail reported that, in the past twelve months, there were no allegations that an inmate was sexually abused or sexually harassed while in the facility.

115.64(b) The Latah County Jail 15.6 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 have received the training in their yearly IPREA training.

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:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interviews with random staff
Interviews with a Medical Practitioner
Interview with Sgt. Jason Alexander

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 Latah County Jail has included in Policy 15.6, a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Interviews with random staff, Medical practitioners, investigators, and facility leadership confirmed they are aware of what their duties would be in a sexual abuse of an inmate.

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:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Written institutional plan for coordinated response
Interviews with investigators
Interviews with random staff
Interview with Medical Practitioner
Interview with Chief Deputy, Tim Besst

Interview with Sgt. Jason Alexander

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 Latah County Sheriff's Office and Latah County Jail do not have any collective bargaining agreements in place and have not had any at any time. Latah 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 Latah County Sheriff's Office and Latah County Jail.

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.

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 inmates 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) Latah County Jail Policy 15.6 prohibits retaliation against inmates or staff members who report sexual abuse or sexual harassment and require monitoring of the inmate or staff member for retaliation. The agency reported that the IPREA Coordinator is charged with monitoring retaliation. The Latah County Jail reported that there have been no incidents of retaliation against an inmate or a staff member for reporting a sexual abuse or sexual harassment. Policy states that “For at least 90 days following a report of sexual abuse, the IPREA Coordinator will monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are any changes that may suggest possible retaliation by inmates or staff and shall immediately take measures to remedy any such retaliation.” The auditor finds that the Latah County Jail exceeds this standard as policy is written to the higher PREA standard.

115.67(b) Latah County Jail Policy 15.6 requires the facility to 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. 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) Latah County Jail Policy 15.6 requires that, following a report of sexual abuse, the agency shall act promptly to remedy any allegation of retaliation against any inmate or staff member who reports sexual abuse or sexual harassment.

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 past twelve months, there have been no incidents where a person has expressed fear of retaliation and needed monitoring.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.6
Completed Pre-Audit Questionnaire submitted by Cpl Kiri Alldredge
Interview with Chief Deputy, Tim Besst
Interview with Sgt. Jason Alexander

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 Latah County Jail Policy 15.5 prohibits staff from placing inmates who allege to have suffered sexual abuse in involuntary segregated 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 segregation 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 segregated housing being used for this purpose during the twelve 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 and inmate interviews, the auditor has determined the facility meets the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.5
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interviews with random staff
Interviews with random inmates
Interview with Sgt. Jason Alexander

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) Latah 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 administrative investigators in the Detention Center and criminal investigations are done by the Latah County Detective Division. When staff are allegedly involved, the case is turned over to the Moscow Police Department or Idaho State Police to conduct the investigation. 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 Latah County Jail. The Latah County Detective Division has three detectives to do criminal investigations in the Jail. A review of training certificates and a training roster confirmed that both of the administrative investigators have had the specialized training for investigators. This training was the NIC classroom training for investigators, "Investigating Sexual Abuse in a Confinement Setting", presented by the Moss Group. 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. All criminal allegations are investigated by Latah County detectives who have had extensive training on sexual abuse investigations and use Miranda and Garrity warnings frequently in day to day investigations. However, none of the criminal investigators have had the specialized training for investigations in confinement settings. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard.

115.71(c) An interview with one of the criminal investigators confirmed that upon initiation of an investigation into a sexual abuse allegation, the investigator gathers and preserves direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data, interviews alleged victims, suspected perpetrators, and witnesses, and reviews prior complaints and reports of sexual abuse involving the suspected perpetrator. There were no criminal investigations into sexual abuse or sexual harassment for the auditor to review.

115.71(d) Unless the allegation is an immediately recognizable criminal investigation, investigations will be initiated as an administrative investigation. All administrative investigations are conducted by the Jail Administrator and the Detention Sergeant and all criminal investigations are done by the Latah County Detective Division. If there is any indication that the investigation appears to involve staff, Sheriff Richard Skiles will request the investigation be done by the Moscow Police Department or Idaho State Police. The Latah County Detectives, Moscow Police Department and Idaho State Police investigators are aware of when compelled interviews are an obstacle to prosecution as they use them frequently in their regular job duties.

115.71(e) Latah County Jails 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. Interviews with investigators stated that credibility is based on evidence, interviews, and the crime scene. 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.

The Latah County Jail reported that it had one allegation of non-criminal inmate-on-inmate sexual harassment reported during the twelve months prior to the audit. The incident was investigated and was found to be substantiated. The inmate making the allegation was moved to another housing unit upon request. The auditor reviewed the initial report and the subsequent investigation documentation. All appeared to be in order. The auditor also interviewed the inmate who had made the allegation and the inmate stated that the deputies were very professional in the way they treat inmates and the inmate felt that the investigation was handled appropriately and was happy with the outcome.

115.71(g and h) Latah County Jail Policy 15.7 and an interview with the Criminal Investigator 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 past twelve months, there have not been any allegations of sexual abuse in the Latah County Jail to investigate.

115.71(i) 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.

115.71(l) When Moscow Police Department Investigators or Idaho State Police Investigators are assigned to an investigation, the Latah County Sheriff's Office and Latah County Jail will cooperate fully with the investigators and will stay informed as to the progress of the investigation. An Interview with a Latah County Criminal Investigator confirmed that there is a very good working relationship between all of the investigators in both agencies.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.7
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Objectives for the course, "Investigating Sexual Abuse in a Confinement Setting"
Training documentation for investigators completing the specialized training
Interviews with Latah County administrative and criminal investigators
Interview with Sgt. Jason Alexander

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail will ensure that all administrative and criminal investigators in the agencies take the specialized training for sexual abuse investigations in confinement settings.

When all investigators have taken the specialized training, the Latah County Jail will send the auditor documentation verifying the training has been completed. This documentation will be sent to the auditor within 180 days of the date of the interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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. Administrative and criminal investigators have successfully completed the NIC online course, “Investigating Sexual Abuse in a Confinement Setting” and copies of the Certificates of Completion were sent to the auditor.

The auditor has reviewed all of the documents and photographs that were sent and the Latah 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) Latah County Jail Policy 15.7 requires the Latah 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:

Latah County Jail Policy 15.7
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interviews with Latah County administrative and criminal investigators
Interview with Sgt. Jason Alexander

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 inmate, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the inmate 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 inmate, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the inmate 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 inmate, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the inmate 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 inmate, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the inmate 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) The Latah 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 Latah County Jail reported that one allegation of inmate-on-inmate sexual harassment was investigated and determined to be substantiated. An interview with the inmate who made the report confirmed that the inmate was advised of the outcome of the investigation.

115.73(b) When an outside agency is brought in for an investigation, the inmate will be notified of the outcome, when it is known.

115.73(c) Latah County Jail Policy 15.7 requires that the inmate is notified whenever:

1. The staff member is no longer posted in the inmate's unit;
2. The staff member is no longer employed at the jail;
3. The Sheriff's Office learns that the staff member has been indicted on a charge related to sexual abuse within the facility;
4. The Sheriff's Office learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

The auditor finds that the Latah County Jail exceeds this standard as the policy is written to the higher PREA standard.

There have been no allegations or investigations of staff members allegedly being involved in sexual abuse misconduct during the twelve months prior to the audit.

115.73(d) Latah County Jail Policy 15.7 requires that all notifications to inmates described under this standard are documented. The notification of the outcome in the above sexual harassment incident was documented and given to the auditor to review.

115.73(e) The Latah 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 and inmate interviews, the auditor has determined the facility exceeds the above standard.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.7
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander

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) Latah 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.

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 Latah County Jail reports that in the past twelve months, there has been no staff member from the facility that 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 that 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:

Latah County Jail Policy 15.8
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander

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 Latah 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 Latah 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 Latah 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:

Latah County Jail Policy 15.8
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander

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) The Latah 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 Latah County Jail reported that during the past twelve months, no allegations of inmate-on-inmate sexual abuse and one allegation of sexual harassment were reported. No disciplinary charges were filed on any inmates.

115.78(c) Latah 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 facility does not provide therapy, counseling, or other interventions for inmate abusers.

115.78(e) The Latah 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 Latah 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 Latah 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.

115.78(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. The Latah County Jail reported that, during the past twelve months, there were no incidences of coerced sexual activity between inmates.

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:

Latah County Jail Policy 15.8
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Inmate Rules and Disciplinary Process
Interview with Sgt. Jason Alexander

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? (N/A if the facility is not a prison.)
  ☐ Yes ☐ No ☒ NA

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, Latah County Jail Policy 15.9 requires the staff member receiving the information offer a follow-up meeting with the Medical Provider to the inmate. However, the Latah County Jail is not conducting risk assessments, is not asking the question of prior sexual abuse to the inmate, and has not offered this follow-up to any inmate. The auditor interviewed one inmate who admitted to being a victim of sexual assault in the community prior to arrest and the inmate stated that no one had asked him about prior sexual abuse before the auditor's interview. Therefore, the auditor finds that the Latah County Jail does not meet this part of the standard

115.81(d) Information related to sexual victimization that occurred in an institutional setting is not strictly limited to medical and mental health practitioners. After booking, the information shared with classification staff is strictly limited to informing security and management decisions, including treatment plans, housing, work, bed, education, and program assignments.

115.81(e) Interviews with a Medical Practitioner verified that informed consent disclosures, when needed, are provided by on-site by medical providers.

POLICY, MATERIALS, INTERVIEWS AND OTHER EVIDENCE REVIEWED:

Latah County Jail Policy 15.9
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Proposed Intake Risk Assessment Form
Interview with Medical Practitioner
Interview with Sgt. Jason Alexander
Interview with one inmate who had been a victim of sexual abuse in the community

CORRECTIVE ACTION REQUIRED:

1. The Latah County Jail should implement the process of conducting a sexual abuse risk screening of all inmates within 72 hours of intake

2. The Latah County Jail should offer follow-up counseling to inmates who disclose sexual abuse either at an institutional facility or in a community setting as required by its policy.

Verification that this is being done should be sent to the auditor within 180 days of the date of the interim report.

VERIFICATION OF CORRECTIVE ACTION SINCE THE AUDIT:

On January 23, 2019, the Latah 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 Latah County Jail has developed a risk screening form and is conducting a sexual abuse risk screening of all inmates within 72 hours of intake.
2. The Latah County Jail offers follow-up counseling to all inmates who disclose sexual abuse either at an institutional facility or in a community setting as required by its policy.

The auditor has reviewed all of the documents and photographs that were sent and the Latah 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 a Medical Practitioner confirmed that inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The Latah 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. When necessary, all victims are transported to Gritman Medical Center in Moscow, 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 a Medical Practitioner 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 Latah 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:

Latah County Jail Policy 15.9
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Proposed MOU Between Alternative to Violence of the Palouse and the Latah County Jail
Interview with a Medical Practitioner
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA 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) Latah County Jail Policy 15.9 requires health evaluations and, as appropriate, treatment to all inmates who have been sexually abused in any correctional institution. Interview with a Medical Practitioner confirmed that the care is consistent with the community level of care and they will offer referrals to the inmate for continuing care, when necessary, when the inmate leaves the facility. The Latah 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 -e) An interview with a Medical Practitioner 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 sexually transmitted infections, as medically appropriate. Medical practitioners will provide ongoing treatment to inmates, when needed.

115.83(f) 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:

Latah County Jail Policy 15.9
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Medical Practitioner
Interview with Sgt. Jason Alexander

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 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) Latah 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 - e) The Review Team consists of the Sheriff's Office Administration, jail supervisory staff and any other persons relevant to the investigation. The review occurs within 30 days of the incident. Recommended improvements are discussed and submitted to the Jail Administrator and the IPREA Coordinator. The Jail Administrator will initiate the improvements or document the reason for not doing so. The Latah 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:

Latah County Jail Policy 15.10
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interviews with investigative staff
Interview with Chief Deputy, Tim Besst
Interview with Sgt. Jason Alexander

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) Latah 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 data collected will include, at a minimum, the data necessary to answer all of the questions from the most recent version of the Survey of Sexual Violence. The actual Survey of Sexual Violence is the instrument that is used to collect the data.

115.87(b) Policy directs the IPREA Coordinator to aggregate the data annually and prepare a report.

115.87(d) The Latah County Jail policy and practice require the collection of the data in accordance with this standard. The facility will create the annual report in January of each year for the previous calendar year. The Latah County Jail has not had any incidents of sexual abuse during the year prior to the audit and, therefore, has not written an annual report.

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:

Latah County Jail Policy 15.10
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge, IPREA 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.

This standard deleted for IPREA

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 - b) Latah 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. The data is stored on a secure server.

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:

Latah County Jail Policy 15.10
Completed Pre-Audit Questionnaire submitted by Cpl. Kiri Alldredge
Interview with Chief Deputy, Tim Besst
Interview with Sgt. Jason Alexander
Interview with Cpl. Kiri Alldredge

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 prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (*Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.*) ☐ Yes ☒ No

115.401 (b)

- Is this the first year of the current audit cycle? (*Note: a "no" response does not impact overall compliance with this standard*.) ☒ Yes ☐ No
- If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is **not** the *second* year of the current audit cycle.) ☒ Yes ☐ No ☐ NA
- If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is **not** the *third* year of the current audit cycle.) ☒ Yes ☐ No ☐ NA

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.

115.401(a-b) The audit conducted on August 6 - 8, 2018 is the first audit for the Latah County Jail. The first audit is an IPREA audit rather than a PREA audit.

115.401(h, I, m, n) The auditor had access to, and the ability to observe, all areas of the audited facility and was permitted to request and receive copies of any relevant documents (including electronically stored information). The auditor was permitted to conduct private interviews with inmates and inmates were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

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.

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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 ______________________ January 28, 2019

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.