

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of facility:		John E Polk Correctional Facility	
Physical address:		211 Bush Blvd. Sanford, Florida 32771	
Date report submitted:		August 29, 2014	
Auditor Information		Katherine Brown	
Address:		12121 Little Road Suite 286 Hudson, Florida 34667	
Email:		Kbrown2828@yahoo.com	
Telephone number:		727-470-4123	
Date of facility visit:		August 5-7, 2014	
Facility Information			
Facility mailing address:		same	
Telephone number:		407-665-1200	
John E. Polk Correctional Facility is:	<input type="checkbox"/> Military	<input checked="" type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Jail	<input type="checkbox"/> Prison	
Name of PREA Compliance Manager:		Bill Rex	Title: Lieutenant
Email address:		brex@seminolesheriff.org	Telephone number: 407-665-1214
Agency Information			
Name of agency:		Seminole County Sheriff Office	
Governing authority or parent agency: <i>(if applicable)</i>			
Physical address:		100 Bush Blvd. Sanford, Fl. 32771	
Mailing address:		same	
Telephone number:		407-665-6600	
Agency Chief Executive Officer			
Name:		Donald Eslinger	Title: Sheriff
Email address:		deslinger@seminolesheriff.org	Telephone number: 407-665-6600
Agency-Wide PREA Coordinator			
Name:		Pete Kelting	Title: Lieutenant
Email address:		pkelting@seminolesheriff.org	Telephone number: 407-665-1391

AUDIT FINDINGS

NARRATIVE:

The audit of John E Polk Correctional Facility was conducted on August 5-7, 2014 by Katherine Brown, Certified PREA auditor. The areas toured were a total of 33 housing units. There are 24 general population units and 9 administrative detention/segregation unit. Plus the kitchen, laundry, programs area, and work areas.

An entrance meeting was held with facility staff. The following people were in attendance: Major Diggs; Lt. Kelting; Cathy Perkins; Cindy Frederick; April Stringer; Captain Shaw; Captain Howard; Captain Almodovar; Frank Pineiro; Lt. Rex; Deputy Acton; JoAnn Stronko; Lt. Allyn; Bernard Johns; Sgt. Pastor.

Following the entrance meeting I toured the John E. Correctional Polk Facility from 08:30 am to 2:30 pm. On the tour with me was, Lt. Kelting; April Stringer; Sgt Pastor and Lt. Rex.

The night before the audit I asked for an alpha listing of all inmates housed at John E. Polk Correctional Facility and randomly selected one inmate from each housing unit as well as I asked for any inmates who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment inmates, I did interview one limited English speaking inmate and one non-English speaking inmate. There were no transgender/intersex inmates. I also asked for a shift roster and randomly selected staff to interview.

On the first day of the audit I conducted the tour of the facility and all the specialized interviews. On day two of the audit I conducted 29 inmate interviews and 10 staff member interviews. On day three of the audit I toured the hydroponics and tilapia farm, reviewed personnel files; and all investigations.

There were 14 sexual assault/harassment allegation cases, all relatively recent (within the past year) seven had been unfounded, five unsubstantiated and two occurred at other facilities.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The John E. Polk Correctional Facility is located at 211 Bush Boulevard, Sanford Florida. It opened in 1980 and is operated under the Seminole County Sheriff's Office. The facility is divided into four divisions: Operations, Intake and Release, Support Services and Health Care services. Staff include a facility director, 3 Deputy Directors, 1 Medical Director, 208 Detention Deputies and 141 additional staff.

In 2010 the facility completed a massive jail expansion. A new Intake/Release area and Sally Port enhanced the booking process. A three story, six unit direct supervision housing area was added increasing the inmate bed capacity from 812 to 1,396. The Kitchen, operated by Trinity Services Group, Inc., was also renovated. The original part of the jail has 8 housing unit: Pods A, B & C Pods each contains 4 housing units with 16 cells. Pods E, F, G & H have three housing units: two of the units house 36 inmates and one unit contains 72. D Pod contains six housing units – one houses maximum inmates; one houses Mental Health GP, one DR/PC unit and two housing mental health observation cells.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 1

Number of standards met: 40

Number of standards not met:

Number of standards not applicable: 2

Standard number here	115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 IV. D. & E; G.O. 25 III A-D; Organizational chart; memo from Sheriff; Based on interviews with PREA Coordinator and PREA compliance manager

Seminole County Sheriff Office has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines their approach to preventing, detecting, and responding to such conduct.

Seminole County Sheriff Office employs an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards.

Seminole County Sheriff Office also designates a PREA compliance manager with sufficient time and authority to coordinate the facility's efforts to comply with the PREA Standards.

Standard number here	115.12 Contracting with other agencies for confinement of inmates
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)
- Not Applicable

Auditor comments, including corrective actions needed if does not meet standard

The John E. Polk Correctional Facility does not contract with any entity to hold either county or state inmates.

Standard number here	115.13 Supervision and monitoring
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- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 IX. A 1-2; 03.03 II A-E; 03.01 III. A, C & D. Reviewed Captain unannounced rounds event log August 20, 2013 and June 24, 2014. Based on interview with Major, random staff, PREA Compliance Manager and PREA Coordinator

Seminole County Sheriff Office has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect inmates against sexual abuse.

In circumstances where the staffing plan was not complied with, John E. Polk Correctional Facility documented and justified all deviations from the plan.

Seminole County Sheriff Office completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed.

Standard number here 115.14 Youthful inmates
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 10.02 III. C. IV B-D & G. Reviewed recreation log and program attendance records. Based on interview with line staff, program staff and juvenile inmates

A youthful inmate is not placed in a housing unit in which the youthful inmate has sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters. There were no youthful inmates at the time of the audit, however if a youthful inmate was received they would be housed D-3.

In areas outside of housing units, Seminole County Sheriff Office provides direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.

Standard number here 115.15 Limits to cross gender viewing and searches

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30; 9.13 V. D.; VIII A, B; IX A-9, B.; V. D. 4; X. C - H. POL 17.02 III. C 4. Reviewed Health Services memo re: transgender; strip search reports

John E. Polk Correctional Facility does not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. In the event a cross gender search is done John E. Polk Correctional Facility documents all cross-gender strip searches and cross-gender visual body cavity searches.

John E. Polk Correctional Facility has policies and procedures that enable 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. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit.

John E. Polk Correctional Facility does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it is determined 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.

Seminole County Sheriff Office trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

Standard number here 115.16 Inmates with disabilities and limited English speaking
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

13.30 X. A; 13.30 XIV B. 7. POL 17.01 III. B. Bi-Lingual staffing plan; Language Line Service Purchase Order 33779; Interpretex – American Sign Language Interrupting Service. Based on

random inmate and staff interviews and Based on interview with limited English speaking inmates

Seminole County Sheriff Office takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of Seminole County Sheriff Office's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. John E. Polk Correctional Facility needs to enhance the training available to the non-English speaking inmates. While they know how to report an incident and were aware of the posters in the housing units I do not feel their education meets the same level as the English speaking inmates, this is an area you could enhance.

Seminole County Sheriff Office does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety.

Standard number here 115.17 Hiring and promotion decisions
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

POL 13.30 VIII. F.; GO 23 VII. A.; VIII. G. Based on interview with Human Resource Director Review of personnel files. Reviewed application and 5 year spreadsheet

Seminole County Sheriff Office does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor who may have contact with inmates, who has engaged in sexual abuse in any criminal justice facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above.

Seminole County Sheriff 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. The Seminole County Sheriff Office uses the FALCON program that automatically triggers a notification if any of their staff are arrested for any offense.

Seminole County Sheriff Office performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates and performs annual records check.

Standard number here 115.18 Upgrades to facilities and technology

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

Auditor comments, including corrective actions needed if does not meet standard

Based on interview with Major.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Seminole County Sheriff Office considers how such technology may enhance Seminole County Sheriff Office's ability to protect inmates from sexual abuse.

The facility went through a major renovation and improvement phase in 2010. A new Direct Supervision Unit was added increasing capacity to 1395 beds. Additionally a renovation of the kitchen allowed for complete food service. The facility upgraded with camera monitoring capabilities and a new master control room over control 3 in order to manage the entire facility. It was suggested to add another camera to the dry storage area in the kitchen. The auditor was told that this has already been added to this coming year's budget.

Suggest adding cameras to the hydroponics area and the greenhouse breakroom due to lack of visibility.

Standard number here 115.21 Evidence protocol and forensic medical exams
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Based on interview with medical PREA Coordinator and PREA compliance manager. Reviewed MOU between Seminole SO and the 18th Judicial Brevard/Seminole State Attorney's Office Sexual Assault Victims Services Unit. 5/16/14; SANE staff schedule.

To the extent Seminole County Sheriff Office is responsible for investigating allegations of sexual abuse; Seminole County Sheriff Office follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions

Seminole County Sheriff Office offers all victims of sexual abuse access to forensic medical examinations, through 18th Judicial Brevard/Seminole State Attorney's Office Sexual Assault Victims Services Unit without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Nurse Examiners (SANEs) from the County Health Department.

Seminole County Sheriff Office makes available to the victim a victim advocate from 18th Judicial Brevard/Seminole State Attorney's Office Sexual Assault Victims Services Unit

As requested by the victim, a victim advocate supports the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals. The John E Polk Facility provided a Certificate verifying a staff member from the State Attorney's Office is trained.

There have been no incidents of sexual abuse requiring the need for a victim advocate.

**Standard
number here**

115.22 Policies to ensure referrals of allegations for investigations

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

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XIV a & B; GO E-24 Based on interview with Major and Professional Standards investigator and Major Crimes Detective.

Seminole County Sheriff Office ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Administrative investigations are conducted by Professional Standards and Criminal Investigations are performed by Major Crimes.

Seminole County Sheriff Office has a policy that ensures 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. Seminole County Sheriff Office publishes such policy on its website www.seminolesheriff.org . Seminole County Sheriff Office documents all such referrals.

Standard number here 115.31 Employee training

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 VIII. A. Reviewed PREA Course Completion History; Computerized On Line Training; On Line PREA Training curriculum and lesson plan. Based on interview with random staff.

Seminole County Sheriff Office trains all employees who have contact with inmates on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;
- (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- (3) Inmates' right to be free from sexual abuse and sexual harassment;
- (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with inmates;
- (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The training is tailored to the gender of the inmates at John E. Polk Correctional Facility. The employees receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa.

Seminole County Sheriff Office documents, through electronic verification, those employees understand the training they have received.

Standard number here 115.32 Volunteer and contractors training
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 VIII. C.; 4.01 VIII A.24. Reviewed PREA test; sign off sheets. Based on interview with volunteer and contractors

Seminole County Sheriff Office ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Seminole County Sheriff Office’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of Seminole County Sheriff Office’s zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Seminole County Sheriff Office has documentation confirming that volunteers and contractors understand the training they have received.

Standard number here	115.33 Inmate education
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 X. A. Reviewed Inmate Handbook; pamphlet; Inmate PREA Education Information Signature Sheet; Interrupter Services Language Line; Interpretex – American Sign language Interrupting Service; Bi-Lingual 2014 staff roster. Inmate Orientation/Handout sign in sheet; Based on interview with random inmates and intake staff

During the intake process, inmates receive information explaining Seminole County Sheriff Office’s zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. The John E. Polk Correctional Facility utilizes the Just Detention International Video. The video is shown in Intake with English subtitles for the hearing impaired. As of August 28, 2014 a Spanish version is available. During the History and Physicals done in medical, the inmates are given a laminated PREA information card to read to further enhance the training they received during the intake process.

Within a few days of intake, Seminole County Sheriff Office provides a comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. There is a 15 minute video that is showed daily prior to first appearance, staff are available to explain and answer any questions. The auditor viewed this video on the second day of the audit.

Seminole County Sheriff Office provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. There is documentation of inmate participation in these education sessions. One on one training is provided to those inmates who are visually impaired or otherwise disabled. John E. Polk Correctional Facility needs to enhance the training available to the non-English speaking inmates. While they know how to report an incident I do not feel their education meets the same level as the English speaking inmates.

Standard number here 115.34 Specialized training: Investigators

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

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 VIII E. Reviewed NIC Course PREA Investigating Sexual Abuse in a Confinement Setting; FSA PowerPoint – Moss Group.; certificates. Based on interview with investigative staff.

In addition to the general training provided to all employees Seminole County Sheriff Office ensures that the Major Crimes investigators and Professional Standards investigators have received training in conducting investigations in confinement settings.

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. Seminole County Sheriff Office maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

Standard number here 115.35 Specialized training: Medical and mental health care
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Based on policy 13.30 VIII. B. 1-4; Reviewed course completion history.

Seminole County Sheriff Office ensures 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; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

Seminole County Sheriff Office maintains documentation that medical and mental health practitioners have received the training.

Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers.

**Standard
number here**

115.41 Screening for risk of victimization and abusiveness

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Based on policy 13.30 XI A – E; 18.01 VI. A&E; VI. 2-3; X. G. Reviewed screening form Based on interview with random inmates and intake staff responsible for screening. Only limited staff has access to the risk screening form only Medical, Mental Health and Major as well as PREA Manager.

All inmates are assessed during an intake screening and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. On all Hold Orders/Transfers the facilities are informed of the inmate's risk of being sexually abused by other inmates or abusive toward other inmates.

Intake screenings take place within 72 hours of arrival at John E. Polk Correctional Facility.

John E. Polk Correctional Facility uses an objective screening instrument.

The intake screening considers, at a minimum, the following criteria to assess inmates for risk of sexual victimization:

- (1) Whether the inmate has a mental, physical, or developmental disability;
- (2) The age of the inmate;
- (3) The physical build of the inmate;
- (4) Whether the inmate has previously been incarcerated;
- (5) Whether the inmate's criminal history is exclusively nonviolent;
- (6) Whether the inmate has prior convictions for sex offenses against an adult or child;
- (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- (8) Whether the inmate has previously experienced sexual victimization;
- (9) The inmate's own perception of vulnerability; and
- (10) Whether the inmate is detained solely for civil immigration purposes.

The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Seminole County Sheriff Office, in assessing inmates for risk of being sexually abusive.

Within 30 days from the inmate's arrival at John E. Polk Correctional Facility, John E. Polk Correctional Facility reassesses the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by John E. Polk Correctional Facility since the intake screening. If inmates are identified in intake that they are a potential target for victimization or exhibit characteristics of predatory behavior they are flagged for reassessment at either 14; 30 days or special reassessment.

An inmate's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

Inmates are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked.

Seminole County Sheriff Office implements appropriate controls on the dissemination within John E. Polk Correctional 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.

Standard number here 115.42 Use of screening information
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 18.01 VI A. 2 & 3; 13.30 XI A – E; 18.01 VI. A&E; X. G. Memo regarding transgender housing assignments. Based on interview with PREA Coordinator and PREA compliance manager and staff responsible for risk screening

Seminole County Sheriff Office uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

Seminole County Sheriff Office makes individualized determinations about how to ensure the safety of each inmate.

Placement and programming assignments for each transgender or intersex inmate is reassessed at least twice each year to review any threats to safety experienced by the inmate.

A transgender or intersex inmate's own views with respect to his or her own safety are be given serious consideration.

Transgender and intersex inmates are given the opportunity to shower separately from other inmates.

Seminole County Sheriff Office does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such 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 such inmates.

Standard number here 115.43 Protective custody
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 10.01 II. C & E; 10.01 VI A-I; 10.01 XII A & B. Based on interview with major, staff who supervise segregated inmates

Inmates at high risk for sexual victimization are not placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers.

Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If John E. Polk Correctional Facility restricts access to programs, privileges, education, or work opportunities, John E. Polk Correctional Facility documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.

John E. Polk Correctional Facility assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment are not ordinarily exceed a period of 30 days. If involuntary segregated housing assignment is made John E. Polk Correctional Facility clearly documents the basis for John E. Polk Correctional Facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Every 30 days a review is performed to determine whether there is a continuing need for separation from the general population. Inmates are reviewed within 7 days and then every 30 days.

Standard number here 115.51 Inmate reporting
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XII A-E; 13.30 V. A. Reviewed PREA hotline, Rape Crisis Center. Based on interviews with random staff and inmates

Seminole County Sheriff Office provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. On all the inmates phones the inmate listens to a recording that prompts them to dial 4 for the abuse line.

Seminole County Sheriff Office provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Seminole County Sheriff Office, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon

request. Reviewed PREA hotline report I/M 201400002937 regarding allegation against an officer at another facility.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports.

Seminole County Sheriff Office provides a method for staff to privately report sexual abuse and sexual harassment of inmates.

Standard number here 115.52 exhaustion of administrative remedies

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 14.03 VII F; M-O; 13.30 IX 7-9

During this audit period there were no grievances filed.

Seminole County Sheriff Office does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.

Seminole County Sheriff Office does not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

Seminole County Sheriff Office ensures 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, and such grievance is not referred to a staff member who is the subject of the complaint.

Seminole County Sheriff Office issues 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.

Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and are also permitted to file such requests on behalf of inmates.

Seminole County Sheriff Office has established procedures for the filing of an emergency grievance when the inmate is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, Seminole County Sheriff Office immediately forwards 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 is taken, and provides an initial response within 48 hours, and issues a final agency decision within 5 calendar days. The initial response and final agency decision documents Seminole County Sheriff Office's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Seminole County Sheriff Office may discipline an inmate for filing a grievance related to alleged sexual abuse only where Seminole County Sheriff Office demonstrates that the inmate filed the grievance in bad faith.

Standard number here 115.53 Inmate access to outside confidential support services
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

13.30 XII. A,B,E; MOU 18th Judicial State Attorney Sexual Assault Victim Services Units; SAVS Rape Hotline 407-321-RAPE. Based on interview with random inmates and inmates who reported sexual assault

John E. Polk Correctional Facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers to the 18th Judicial State Attorney Sexual Assault Victim Services Unit SAVS , including toll-free hotline numbers to SAVS Rape Hotline 407-321-RAPE. John E. Polk Correctional Facility enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.

John E. Polk Correctional Facility informs 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.

Standard number here 115.54 Third party reporting

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XII. D. Reviewed PREA Violation Report Form on www.seminolesheriff.org Seminole County Sheriff Office has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of an inmate.

Standard number here 115.61 Staff and agency reporting duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 13.30 VIII A. 10-11; 13.30 XIV B.; FSS 415.1034. Based on interviews with random staff; Major and medical/mental health staff.

Seminole County Sheriff Office requires 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 Seminole County Sheriff Office; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Apart from reporting to designated supervisors or officials, staff do not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, Seminole County Sheriff Office reports the allegation to the designated State or local services agency under applicable mandatory reporting laws. If the case involves a youthful inmate the incident is reported to the Department of Children & Families. If the alleged victim is considered a vulnerable adult under Florida State Statute 415, Seminole County Sheriff Office reports the allegation to the designated State or local services agency under applicable mandatory reporting laws.

John E. Polk Correctional Facility reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to John E. Polk Correctional Facility's designated investigators.

Standard number here **115.62 Agency protection duties**

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

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XIII. A. Based on interviews with random staff, and Major

Immediate action is taken to protect inmates when Seminole County Sheriff Office learns that an inmate is subject to a substantial risk of imminent sexual abuse. During this audit period no inmates have been subject to substantial risk.

Standard number here **115.63 Reporting to other confinement facilities**

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

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XIV A. Based on interview with agency head and Major

Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of John E. Polk Correctional Facility that received the allegation notifies the head of the facility or appropriate office of the facility where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. Reviewed acknowledgement from DOC and request from DOC investigator to interview inmate. Volusia County notified Seminole of incident that occurred at Seminole 6/30/14, reviewed reports.

Standard number here **115.64 Staff first responder duties**

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XIII a & E. Based on interview with security staff who are first responders, random staff.

Upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond separates the alleged victim and abuser; preserves and protects any crime scene until appropriate steps can be taken to collect any evidence; and if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and 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.

If the first staff responder is not a security staff member, the responder request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

Standard number here 115.65 Coordinated response
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- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.300 XIII 1st Responder; XIV Investigation. Based on interview with Major

John E. Polk Correctional Facility has 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.

Standard number here 115.66 Preservation of ability to protect inmates from contact with abusers
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- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

X Not applicable

Auditor comments, including corrective actions needed if does not meet standard

The Seminole County Sheriff Office does not participate in collective bargaining.

Standard number here 115.67 Agency protection against retaliation

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

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 VIII A. 10; XIV D-F & H; G-25 III. A. Based on interview with agency head, Major, designated staff member with monitoring retaliation; inmates in segregation for risk of sexual victimization

Seminole County Sheriff Office has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and are designate which staff members or departments are charged with monitoring retaliation.

Seminole County Sheriff Office has 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 that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, Seminole County Sheriff Office monitors the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and are act promptly to remedy any such retaliation. There are periodic status checks performed. Items Seminole County Sheriff Office should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Seminole County Sheriff Office continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

If any other individual who cooperates with an investigation expresses a fear of retaliation, Seminole County Sheriff Office takes appropriate measures to protect that individual against retaliation.

Standard number here 115.68 Post allegation protective custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Based on interview with Major.

Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse receive all the same rights and privileges as general population inmates. During this audit period no inmates have been placed in segregation as a result of a sexual abuse.

Standard number here 115.71 Criminal and administrative agency investigation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy E-24 IV B 1-10; E-24 IV. D; E-29; POL 13.30 XVI. A. Victim & Witness Services; G-34 VIII Administrative Investigations. Scene Examination procedures #4. Based on interview with investigative staff. There have been no substantiated cases.

When Seminole County Sheriff Office conducts its own investigations into allegations of sexual abuse and sexual harassment, it does so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

Where sexual abuse is alleged, Seminole County Sheriff Office uses investigators who have received special training in sexual abuse investigations.

Investigators gather and preserve 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. Major Crimes call the Forensic Unit to process the scene and collect all evidence.

When the quality of evidence appears to support criminal prosecution, Seminole County Sheriff Office conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. No agency requires an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

Administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Criminal investigations are documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

Substantiated allegations of conduct that appears to be criminal are referred for prosecution.

Seminole County Sheriff Office retains all written reports for as long as the alleged abuser is incarcerated or employed by Seminole County Sheriff Office, plus five years.

The departure of the alleged abuser or victim from the employment or control of John E. Polk Correctional Facility or agency does not provide a basis for terminating an investigation.

Standard number here 115.72 Evidentiary standard for administrative investigation

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

Auditor comments, including corrective actions needed if does not meet standard

Policy G-34 IV E. Based on interview with investigative staff.

Seminole County Sheriff Office imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

Standard number here 115.73 Reporting to inmates
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XVI A & B. Based on interview with Major; investigative staff. Reviewed the notification letter that goes to the inmates.

Following an investigation into an inmate’s allegation that they suffered sexual abuse in the facility, Seminole County Sheriff Office informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

Following an inmate’s allegation that a staff member has committed sexual abuse against the inmate, Seminole County Sheriff Office subsequently informs the inmate (unless Seminole County Sheriff Office has determined that the allegation is unfounded) whenever the staff member is no longer posted within the inmate’s unit; the staff member is no longer employed at John E. Polk Correctional Facility; Seminole County Sheriff Office learns that the staff member has been indicted on a charge related to sexual abuse within John E. Polk Correctional Facility; or Seminole County Sheriff Office learns that the staff member has been convicted on a charge related to sexual abuse within John E. Polk Correctional Facility. There have been no staff members involved in a sexual abuse incident.

Following an inmate’s allegation that they had been sexually abused by another inmate, Seminole County Sheriff Office subsequently informs the alleged victim whenever Seminole County Sheriff Office learns that the alleged abuser has been indicted on a charge related to sexual abuse within John E. Polk Correctional Facility; or Seminole County Sheriff Office learns that the alleged abuser has been convicted on a charge related to sexual abuse within John E. Polk Correctional Facility. There have been no reported sexual abuse incidents between inmates.

All such notifications or attempted notifications are documented.

An agency’s obligation to report under this standard is terminated if the inmate is released from Seminole County Sheriff Office’s custody.

Standard number here 115.76 Disciplinary sanctions for staff

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 VII A.; GO 35 III. A.; V.

Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. Administrative Code 11B-27 requires all incidents to be reported to the Commission.

Standard number here 115.77 Corrective action for contractors and volunteers
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 VIII. C. 1. Based on interview with Major

Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

John E. Polk Correctional Facility takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Standard number here 115.78 Disciplinary sanctions for inmates
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XIV B; 13.30 XV A.; 15.01 V. B.; POL 13.07 IV. C. 9; VI B Inmate Discipline Category 1 violation; Based on interview with medical/mental health staff

Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

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

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

If John E. Polk Correctional Facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, John E. Polk Correctional Facility are consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

The John E. Polk Correctional Facility disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

A report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred does not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

The John E. Polk Correctional Facility prohibits all sexual activity between inmates and may discipline inmates for such activity.

**Standard
number here**

115.81 Medical and Mental health screening; history of sexual abuse

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XI B & C; 13.30 XI E; 13.07 IV C; 13.30 V A & B; 13.07 VI A & B; 13.02 IV. E. Based on interview with staff responsible for risk screening and medical/mental health staff

If the screening indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, 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.

If the screening indicates that an inmate has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.

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

Medical and mental health practitioners 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.

Standard number here	115.82 Access to emergency medical and mental health services
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XIII. B & C.; 13.02 VI. D. 2. 13.24 II F. Based on interview with medical and mental health staff and inmates who reported sexual abuse.

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.

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

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

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Standard number here 115.83 ongoing medical and mental health care for sexual abuse victims

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

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.02 XII; 13.06 III. 13.07 I & II; 13.30 XI C. Based on interview with medical/mental health staff and inmates who reported sexual assault.

John E. Polk Correctional Facility offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

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.

John E. Polk Correctional Facility provides such victims with medical and mental health services consistent with the community level of care.

Inmate victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Standard number here 115.86 Sexual abuse incident reviews

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XIV C. Reviewed Incident Review Report March 19, 2014. Based on interview with Major, PREA Coordinator and PREA compliance manager; incident review team

John E. Polk Correctional Facility conducts 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. This review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

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

Standard number here 115.87 Data collection

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Policy 13.30 XVII A.

Seminole County Sheriff Office collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, and aggregates the incident-based sexual abuse data at least annually.

The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

Seminole County Sheriff Office maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Upon request, Seminole County Sheriff Office provides all such data from the previous calendar year to the Department of Justice no later than June 30. No request have been made.

Standard number here 115.88 Data review for corrective action

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

Auditor comments, including corrective actions needed if does not meet standard

Based on interview with PREA coordinator and reviewed annual report.

Seminole County Sheriff Office reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as Seminole County Sheriff Office as a whole.

Such reports includes a comparison of the current year’s data and corrective actions with those from prior years and provides an assessment of Seminole County Sheriff Office’s progress in addressing sexual abuse.

Seminole County Sheriff Office’s report is approved by Seminole County Sheriff and made readily available to the public through its website or www.seminolesheriff.org .

Standard number here 115.89 Data storage, publication and destruction

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor comments, including corrective actions needed if does not meet standard

Seminole County Sheriff Office makes 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 www.seminolesheriff.org .

All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires.

AUDITOR CERTIFICATION:

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

Katherine Brown

Auditor Signature

August 28, 2014

Date