

PREA AUDIT REPORT Interim Final
ADULT PRISONS & JAILS

Date of report: November 1, 2016

Auditor Information			
Auditor name: Darnel Carlson			
Address: P.O. Box 1201; Brainerd, MN 56401			
Email: darnel.carlson@crowwing.us			
Telephone number: 218-822-7007			
Date of facility visit: October 27-28, 2016			
Facility Information			
Facility name: Renville County Jail			
Facility physical address: 105 5 th St. S., Suite 210; Olivia, MN 56277			
Facility mailing address: <i>(if different from above)</i> Click here to enter text.			
Facility telephone number: 320-523-3600			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Prison	<input checked="" type="checkbox"/> Jail	
Name of facility's Chief Executive Officer: Ned Wohlman			
Number of staff assigned to the facility in the last 12 months: 16			
Designed facility capacity: 78			
Current population of facility: 62			
Facility security levels/inmate custody levels: Minimum, Medium, Maximum			
Age range of the population: 18-83			
Name of PREA Compliance Manager: Click here to enter text.		Title: Click here to enter text.	
Email address: Click here to enter text.		Telephone number: Click here to enter text.	
Agency Information			
Name of agency: Renville County Jail			
Governing authority or parent agency: <i>(if applicable)</i> Renville County Sheriff's Office			
Physical address: 105 5 th St. S., Suite 210; Olivia, MN 56277			
Mailing address: <i>(if different from above)</i> Click here to enter text.			
Telephone number: 320523-3600			
Agency Chief Executive Officer			
Name: Scott Hable		Title: Sheriff	
Email address: ScottH@renvillecountymn.com		Telephone number: 320-523-3771	
Agency-Wide PREA Coordinator			
Name: Ned Wohlman		Title: Jail Administrator	
Email address: NedW@renvillecountymn.com		Telephone number: 320-523-3778	

AUDIT FINDINGS

NARRATIVE

The Renville County Jail was audited on October 27-28, 2016. A review of some of the pre-audit documents had been conducted prior to the on-site visit. The initial meeting began at approximately 9:30 AM and was attended by Jail Administrator Ned Wohlman. The Audit process was discussed, the staff schedule, inmate roster, and a list of additional documents were requested for review as part of the audit.

The facility tour was conducted by Jail Administrator Ned Wohlman. During the initial tour, all areas of the facility were toured, including intake/booking, kitchen and laundry areas, education/programming areas, recreation areas, inmate housing units, administrative offices, and health services. During the facility tour, this Auditor noted that PREA related material was posted in the facility. The PREA Audit notice was visibly posted throughout the facility. The facility has a CCTV system that covers all areas of the jail with video retention. During the twelve month period prior to the audit, there was one instance of an unfounded claim of sexual abuse.

During the on-site audit, this auditor reviewed and requested copies of specific documentation and information for compliance with PREA. This included review of staff backgrounds, staff orientation and training records, contractor and volunteer training and orientation documents, inmate PREA education documents, screening tools, and investigative reports. Interviews were conducted with the Sheriff, Jail Administrator, PREA Coordinator, medical staff, agency contract administrator, administrative (Human Resource) staff, contractors who have contact with inmates, staff who perform screening for risk of victimization and abusiveness, member of the incident review team, designated staff member charged with monitoring retaliation, intake staff, random staff, and random inmates.

MISSION STATEMENT

Renville County Jail Mission Statement:

The Renville County Jail provides for the safe, secure and humane detention of offenders brought to this facility. To fulfill this responsibility, the Renville County Jail shall follow the standards established by the Minnesota Department of Corrections, Minnesota State Statutes, and the United States Constitution.

Renville County Sheriff's Office Mission Statement;

With public safety as our unwavering priority, it is the mission of the Renville County Sheriff's Office to provide professional, high quality and effective public safety service to the citizens of Renville County. This will be accomplished through collaboration with our communities and public safety partners, responsible use of resources, sound administrative policies, technological advances, and leadership development.

With a strong community-oriented policing philosophy, we are driven to enhance the quality of life and foster a sense of safety and security within Renville County.

CORE VALUES:

HONOR:

Doing what is right, not just for ourselves, but for others.

INTEGRITY:

Maintaining a strong sense of honesty, morality, goodness, and ethical character.

PRIDE:

Believing in what we do and having the compassion to lift up others and help those less fortunate.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Renville County Jail is a Class III facility as defined by rule 2911.0200.S.13 from the Minnesota Department of Corrections 2911 Licensing Rules Adult Detention Facilities. The Renville County Jail has a licensed capacity of 78 inmates and houses adult male and female inmates who are pre-trial, pending final sentencing, or serving a sentence less than one year per conviction. The Renville County Jail has contracts with the Federal Bureau of Prisons and Redwood County to house their inmates. Renville County operates 1 jail facility which was built in 2008 and utilizes linear intermittent supervision.

The Renville County Jail is a one level building that consists of a vehicle sally port, booking area with three individual holding cells, administrative offices, kitchen, laundry, medical area, program areas, gym, and, two – four man double bunked cells, and six housing units, four – eight bed – two tier units and two – sixteen bed – two tier units.

The Renville County Jail contracts with A’viands LLC as their food service provider. A’viands provides essential personnel required to prepare meals and perform all necessary functions of a kitchen. A’viands personnel supervise inmate labor used in the kitchen to help prepare meals, wash dishes, and clean the kitchen. Meals are prepared on-site and delivered to the housing units and served to the inmates.

An inmate worker is assigned to the facility’s laundry. Laundry services is responsible for cleaning the bedding, lines, and clothing for the facility.

The Renville County Jail contracts with MEnD Correctional Care. MEnD Correctional Care provides Licensed and a certified medical practitioner that provides for the delivery of health care services, including, medical and dental. Mental Health Services are contracted through Behavioral Forensic Services.

The Renville County Jail offers programs to inmates on various set schedules. The inmates are offered a variety of programs including, GED, A.A. classes, spiritual based programs, recreation, library, and Work Release. There is one programmer that works Monday – Friday who facilitates programming for each housing unit throughout the week.

SUMMARY OF AUDIT FINDINGS

On October 27-28, 2016, two site visits were completed at the Renville County Jail in Renville County, Minnesota. The Renville County Jail exceeded 1 standards; met 41 standards, 0 standards were not met; 1 standards not applicable.

Number of standards exceeded: 1

Number of standards met: 41

Number of standards not met: 0

Number of standards not applicable: 1

Standard 115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

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

- (a) Policy 612 – Prison Rape Elimination Act (612.2) clearly states the Agency’s zero tolerance with regard to sexual abuse and sexual harassment in their facility. Policy 612 – Prison Rape Elimination Act outlines the Agency’s approach to preventing, detecting, and responding to sexual abuse and harassment, prohibited behavior, and definitions as defined in the PREA Standards. Policy 612 – Prison Rape Elimination Act (612.7.1) prohibit staff from engaging in sexual abuse and are subject to disciplinary sanctions up to and including termination for staff who have engaged in sexual abuse.
- (b) The Renville County Jail Organizational Chart designates the Jail Administrator as the PREA Coordinator. During the interview with the designated PREA Coordinator, he reports having sufficient time and authority to develop, implement, and oversee Agency efforts to comply with the PREA standards. The Renville County Jail operates one facility which is the Renville County Jail.
Interviews with the Sheriff and Jail Administrator verify their strong commitment to enforcing a zero tolerance policy toward sexual abuse and harassment and that all claims will be taken seriously and investigated without retaliation toward the staff and inmates involved.
Renville County exceeds this standard because of their strong commitment to enforcing zero tolerance of sexual abuse or harassment in their Facility.

Standard 115.12 Contracting with other entities for the confinement of inmates

- 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)

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The Renville County Jail has a verbal agreement with another Agency for the occasional housing of their inmates. Renville County understands that they must house with a PREA compliant jail in order to maintain their PREA Compliance.

Standard 115.13 Supervision and monitoring

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

- (a) Policy 247 – Staffing states that the Renville County Jail ensures the safety, security, and efficient operation of their Facility by assigning custody personnel according to a detailed staffing plan that is developed and maintained in accordance with law. Department of Corrections rule (2911.0900.S.1) mandates the staffing plan be reviewed at least annually. The most recent staffing plan is based on the licensed capacity of 78 inmates.
- (b) The Renville County Jail does not deviate from the staffing plan. In the last twelve months, Renville realigned their staffing to all full-time employees to ensure minimum coverage on all shifts. Staff overtime or coverage by members of Administration would be used to maintain minimum staffing levels on each shift. During the interview with the Jail Administrator, he explained the staffing realignment and the benefits for the jail. Review of the staffing plan verifies compliance with this standard. The Facility has added additional cameras in booking to help deter sexual assault and harassment in the jail. All the cameras are in proper working order and replaced when needed.
- (c) The Jail Administrator/PREA Coordinator verified he maintains and updates the staffing schedule annually.
- (d) While reviewing documentation and through staff interviews during the on-site audit, this Auditor found that a practice of intermediate-level or higher-level supervisors conducted unannounced rounds but they were not documented.

On November 28, 2016 a copy of the Unannounced Inspection Log was received via email.

Standard 115.14 Youthful inmates

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

Policy 512 – Juvenile Detentions addresses this standard. During the twelve months prior to the audit, there was zero juvenile and zero youthful inmates housed at the Renville County Jail. The Renville County Jail holds juveniles for a maximum of six hours. Juvenile and youthful inmates would be placed in a holding cell in booking with sight and sound separation from adult inmates while awaiting transport.

Standard 115.15 Limits to cross-gender viewing and searches

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

- (a) Policy 528 – Searches states that jail staff will not conduct cross-gender modified strip searches or strip searches except in exigent circumstances. Physical body cavity searches will be performed only by a physician. There have been zero cross-gender modified strip searches or strip searches performed in the twelve months prior to the audit.
- (b) Policy 528 – Searches states that except in emergencies, male staff may not pat down female inmates and female staff may not pat down male inmates. All cross-gender pat-down searches of an individual of the opposite sex shall be documented. Interviews conducted with staff and inmates confirm that female inmates’ are not restricted from attending out of cell activities. In the twelve months prior to the audit, there have been zero cross-gender pat down searches performed by male staff of a female inmate.
- (c) Policy 528 – Searches requires staff to document cross-gender searches.
- (d) Policy 528 – Searches addresses this standard. The shower and bathroom areas allow inmates’ their privacy. While interviewing staff and inmates during the on-site audit, this Auditor found that staff of the opposite gender were not announcing their presence when entering an inmate housing unit of the opposite gender. On November 28, 2016, this Auditor was provided documentation via email that staff began announcing their presence as “male officer on the floor” and “female officer on the floor” on November 17, 2016.
- (e) Policy 528 – Searches (528.9) prohibits staff from searching or physically examining a transgender or intersex inmate for the sole purpose of determining the inmate’s genital status. Staff interviews verified compliance with this standard.
- (f) Staff have been trained to conduct cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner. During staff interviews they were able to explain the process used to conduct cross-gender, transgender, or intersex pat-down searches. On the dates of the on-site audit, and the twelve months prior to the audit, there have been zero transgender or intersex inmates housed at the facility.

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

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

Policy 604 – Inmates With Disabilities addresses this standard. The Facility has a signed agreement with a Spanish

speaking interpreter to provide interpretive services for Spanish speaking inmates which includes the reporting of sexual assault or sexual abuse and translating English PREA forms to Spanish PREA forms. The Facility has access to the Language Line and interpreter services for the deaf and hard of hearing.

Interviews with staff verify inmate interpreters have not been used or would not be used unless circumstances exist where a delay could compromise an inmates safety. There were zero inmate interpreters, readers, or other types of assistants used in the twelve months prior to the audit. At the time of the on-site audit, there were zero limited English speaking or deaf or hard of hearing inmates housed at the Renville County Jail.

Standard 115.17 Hiring and promotion decisions

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

Policy 308 – Selection Process (308.4) prohibits the hiring or promoting of anyone who may have contact with inmates that: Have engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institutions; Have been convicted of engaging or attempting to engage in sexual activity by overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or have been civilly or administratively adjudicated to have engaged in sexual activity.

The Renville County Jail asks the above listed questions during interviews and background checks. The Agency does not complete annual employee appraisals. Policy prohibits the Agency to enlist the services of any contractor or volunteer who may have contact with inmates if they have engaged in the activity listed in (a) of this standard. Policy 308 – Selection Process (308.3.1) states every person who may have inmate contact as a member or contractor, shall, prior to service, undergo a thorough background investigation and follow-up criminal background checks at least every five years. Unless prohibited by law, the Agency will provide information on substantiated allegations of sexual abuse or harassment that involve a former employee upon receiving a request from an institutional employer.

In the twelve months prior to the audit, there were four persons hired who have had criminal records background checks, and zero new contractors, which was verified during the on-site audit.

On November 28, 2016 a spreadsheet with a list of jail employees was emailed which verified that a background check was conducted on all jail staff and background checks will be conducted in 2021.

Standard 115.18 Upgrades to facilities and technologies

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These

recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Interviews with the Sheriff and Jail Administrator confirm that PREA will be taken into consideration in any future planning for technology upgrades in the facility. The Agency replaces cameras when needed and has future plans to replace the current camera system with new cameras and audio.

Standard 115.21 Evidence protocol and forensic medical examinations

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

Policy 612 – Prison Rape Elimination Act (612.7) states that an administrative, criminal investigation or both shall be completed for all allegations of sexual abuse and sexual harassment. The Renville County Sheriff’s Office has two investigators that has received specialized training to conduct administrative and criminal investigations. The Sheriff’s Office Sexual Assault Investigations Policy details how to conduct a criminal investigation of sexual abuse which meets the requirements of this standard.

Inmate victims of sexual abuse will be offered access to forensic medical examinations at a local hospital without financial cost, when evidentiary or medically appropriate. Forensic Medical Examinations will be conducted at RC Hospital, Olivia, MN. <http://www.rchospital.com/> who has SANE trained Registered Nurses on staff and available 24/7. The Renville County Jail has a signed agreement with RC Hospital to provide care as needed for Renville County Jail’s sexual assault victims through their emergency department.

The Renville County Jail has a signed MOU with Safe Avenues:

<https://www.domesticshelters.org/mn/olivia/56277/safe-avenues#.WE41z7lrKUK> to provide advocacy services to inmates. The phone number for Safe Avenues is posted in the housing areas.

There has been zero substantiated claims of sexual abuse and zero forensic medical exams performed in the twelve months prior to the audit.

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

Policy 612 – Prison Rape Elimination Act (612.7) states that an administrative investigation, criminal investigation or

both shall be completed for all allegations of sexual abuse and sexual harassment. Trained investigators with the Renville County Sheriff's Office will conduct administrative and criminal investigations. In the twelve months prior to the audit, there was one allegation of sexual assault resulting in an administrative and criminal investigation with a final disposition of unfounded. The Renville County Jail publishes their policy on their website: <http://www.renvillecountymn.com/sheriff/divisions/jail/PREA.php>

Interviews with the Sheriff and Jail Administrator confirmed that an administrative or criminal investigation will be completed on all allegations of sexual abuse and sexual harassment.

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

Review of training records and curriculum confirm that staff have received training. Interviews with staff verify being provided training and area able to effectively communicate the training information. PREA Training is conducted quarterly; the training used is from the PREA Resource Center. Training is provided for newly hired staff and current staff. Facilities and IT County employees are provided training on the Renville County Jail's zero tolerance for sexual abuse and sexual harassment.

Standard 115.32 Volunteer and contractor 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Renville County Jail requires that all volunteers, as part of their orientation receive PREA training; volunteers sign they have received and understand their training, which includes PREA.

The Facility contracts for food service with A'viands who provides PREA Training for their employees which the PREA Coordinator maintains copies of.

The Facility contracts for medical services with MEnD Correctional Care who receive full PREA training as part of their Company's new employee orientation with refresher training every 2 years. Years in which employees do not receive refresher training, the employees are provided refresher information. MEnD's Policy – PREA Training and Intervention and MEnD Protocol – Sexual Assault addresses the requirements of this standard. MEnD provides PREA

training to their employees that cover all topics in standard 115.31.
Interviews with contracted staff and review of training records verify PREA training is provided.

Standard 115.33 Inmate education

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

During the initial booking process inmates are provided with information on the Facility’s zero tolerance for sexual abuse, consequences for violating the policy, and how to report incidents. Inmates are issued a card at booking to access kiosks located in the housing units. When the inmate signs into the kiosk for the first time and every thirty days thereafter, he/she is required to read and acknowledge the Facility’s PREA education information. Every thirty days, a designated staff member individually meets with each inmate and reviews the information provided at booking. There is PREA information located in the inmate handbook provided to each inmate. The agency provides inmate education in formats accessible to all inmates including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, and inmates who have limited reading skills as described in standard 115.16. Interviews with inmates confirm receiving PREA education and meeting individually on a monthly basis with a designated staff person. Interviews with staff verify that inmates are provided PREA education and met with individually on a monthly basis.

Standard 115.34 Specialized training: 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Policy 612 – Prison Rape Elimination Act (612.7) states that only investigators who have completed office-approved training on sexual abuse and sexual harassment investigation shall be assigned to investigate these cases. Renville County has two investigators that have received specialized training to conduct sexual abuse and harassment investigations in confinement settings. Copies of the certificates of completion were provided during the on-site audit. At the time of the on-site audit, there was one investigative report to review.

Standard 115.35 Specialized training: Medical and mental health care

- 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)

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Policy 317 – Prison Rape Elimination Act Training (317.4) addresses this standard. Forensic medical examinations will not be conducted by MEnD employees. Alleged inmate victims will be transported to RC Hospital in Olivia, MN who has SANE trained Registered Nurses on staff and available 24/7. Interviews with MEnD staff confirm they will not conduct forensic medical examinations, emergent care would be provided prior to an inmate victim's transport to the emergency department at the RC Hospital. Staff training records were verified during the on-site audit.

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

Policy 516 – Inmate Classification (516.3; 516.3.1) states that the Facility classification plan include an initial screening process using an objective screening tool that includes the criteria listed in 115.14 (d) 1-10. While reviewing documents during the on-site audit, it was found that the Facility had not implemented a risk assessment screening tool. The assessment tool was discussed with the Jail Administrator/PREA Coordinator and where the assessment tools would be stored to maintain appropriate controls on dissemination within the facility. On November 28, 2016, a copy of the sexual violence assessment tool was implemented in the facility. The Jail Administrator/PREA Coordinator will secure the completed assessment tools in his office.

Policy 516 – Inmate Classification – (516.5) states that classification of an inmate will be conducted as soon as possible but no later than 24 hours after the inmate's arrival at the facility once it has been determined the person arrested will not be released from custody. Interviews with inmates and staff confirm that inmates are generally classified within 24 hours of arrival.

Policy 516 – Inmate Classification (516.6.1) requires that inmates are reassessed within 30 days and each 30 days thereafter or when required due to a referral, request, incident of sexual abuse, or receipt of additional information that increases the inmate's risk of sexual victimization or abusiveness.

Policy 516 – Inmate Classification – (516.3.1) prohibits inmates be disciplined for refusing to answer, or not disclosing complete information in response to questions asked pursuant to (d)(1); (d)(7); (d)(8); or (d)(9) of this standard.

Standard 115.42 Use of screening information

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

Policy 516 – Inmate Classification (516.3); (516.5.1); (516.6.1);(516.10) Classification Plan states that the plan should include an initial screening process, as well as a process for determining appropriate housing assignments and that housing, bed, work, and program assignments should be made to separate inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Interviews with staff verified that although they were not using a sexual violence tool, they were completing an Initial Custody Assessment to determine an appropriate custody level to ensure proper classification of inmates. Since the implementation of Renville County’s sexual violence assessment tool, the Facility uses both assessments to determine housing assignments for inmates. Housing and program assignments of a transgender or intersex inmate shall include individualized consideration for the inmate’s health and safety and any related supervisory, management or facility security concerns. A transgender or intersex inmate’s views with respect to his/her own safety shall be given serious considerations. Transgender and intersex inmates are given the opportunity to shower separately, there are individual showers available in each housing unit for inmates to use. Interviews with staff verified that the Facility would follow established policies for housing transgender and intersex inmates on a case-by-case basis. The Renville County Jail has also implemented a gender preference form, which is completed during a conversation with a transgender or intersex inmate to determine who the inmate prefers conducting searches. At the time of the on-site audit and the twelve months prior to the audit, there was zero transgender or intersex in or admitted to the facility.

Standard 115.43 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Policy 516 – Inmate Classification (516.10) states that inmates at high risk for sexual victimization shall not be placed in involuntary protective custody unless an assessment of all available alternatives has been made and it has been determined that there is no available alternative means of separation from likely abusers. During the interview with the Jail Administrator, he verified that protective custody would only be used as an alternative means of separation from likely abusers until an alternative means of separation could be arranged. In the twelve months prior to the audit, there has been zero inmates placed in involuntary segregated housing for one to twenty-four hours awaiting completion of their assessment, and there has been zero inmates placed in

involuntary segregated housing for longer than thirty days while awaiting alternative placement.

Standard 115.51 Inmate reporting

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

Policy 612 – Prison Rape Elimination Act outlines multiple internal ways inmates can privately report sexual abuse and sexual harassment which includes: anonymous reports, verbal reports, written reports, and reports from third parties. The Renville County Sheriff’s Office has a memorandum of understanding with Safe Avenues <https://www.domesticshelters.org/mn/olivia/56277/safe-avenues#.WFc9JIMrKUK> that allows inmates to report abuse or harassment to an organization that is not part of the Sheriff’s Office. Inmates are given information during the intake process on the options they have for reporting sexual abuse or harassment. A designated staff member meets with each inmate individually every thirty days to review the information provided at intake. Inmates are also required to read educational information when they initially sign into the kiosk and every thirty days thereafter. During staff interviews, it was verified that they would accept reports made verbally, in writing, anonymously, and from third parties. Staff verified that they would promptly document any verbal reports. Policy states that staff may privately report sexual abuse and sexual harassment of inmates to the Jail Administrator. The Jail Administrator stated that staff could also privately report to Safe Avenues. Jail staff expressed full confidence in their Administration taking all reports of sexual abuse and harassment seriously and they would investigate all reports. Staff also were confident they could report claims without fear of retaliation or discipline from their Administration for making a report. Inmate interviews verified they had someone they could report sexual abuse or harassment to. Several inmates stated they would be comfortable reporting to a correctional officer.

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

Policy 620 – Inmate Grievances does not impose a time limit on when an inmate can submit a grievance regarding an allegation of sexual abuse. Grievances may be submitted to any staff member and need not be submitted to the member who is the subject of the complaint. Staff receiving a grievance shall forward the grievance to a supervisor. Grievances will not be forwarded to any supervisor who is the subject of the complaint. Third parties, including

fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing such grievances and to file such grievances on behalf of the inmate. An inmate who believes he/she or any other inmate is in substantial risk of imminent sexual abuse may file an emergency grievance with any supervisor. The supervisor shall determine whether immediate action is reasonably necessary to protect the inmate and shall provide an initial response within 48 hours and the final decision within five calendar days. During the Jail Administrator's interview, he confirmed there is no time limit imposed for an inmate to submit a grievance related to allegations of sexual abuse. In the twelve months prior to the audit, there was one emergency grievance filed alleging sexual abuse which was addressed by the Facility within forty-eight hours.

Standard 115.53 Inmate access to outside confidential support services

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

Policy 612 – Prison Rape Elimination Act (612.3.f) addresses this standard. The Renville County Jail has a signed memorandum of understanding with Safe Avenues <https://www.domesticshelters.org/mn/olivia/56277/safe-avenues#.WFc9JIMrKUK> to provide outside advocacy services for emotional support to inmates. Safe Avenues phone number is posted in the housing units. Inmates are able to speak to an advocate from Safe Avenues privately.

Standard 115.54 Third-party reporting

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

Renville County Jail has a signed memorandum of understanding with Safe Avenues <https://www.domesticshelters.org/mn/olivia/56277/safe-avenues#.WFc9JIMrKUK> to accept inmate third-party reports of sexual abuse and sexual harassment. Contact information for any person or inmate to report any allegation on behalf of an inmate is posted on the website: <http://www.renvillecountymn.com/sheriff/divisions/jail/PREA.php>

Standard 115.61 Staff and agency reporting 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Policy – Prison Rape Elimination Act (612.4) states any employee, agency representative, volunteer, or contractor who becomes aware of an incident of sexual abuse, sexual harassment, or retaliation against inmates or staff shall immediately notify a supervisor. Threats or allegations of sexual abuse and sexual harassment, regardless of the source, shall be documented and referred for investigation. Sexual abuse and sexual harassment reports shall only be made available to those who have a legitimate need to know.

MEnD Nursing Protocol – Sexual Assault requires medical staff to report sexual abuse allegations based on facility policy, notification to inmates of their limitations of confidentiality, and only disclosing information related to the alleged misconduct to those necessary per facility policy. Interviews with medical staff confirmed that medical staff notify inmates of their limitations of confidentiality, and will only disclose information related to the alleged misconduct to those necessary per facility policy. Minnesota law requires mandated reporting to Department of Human Services if the victim is under the age of 18 or considered a vulnerable adult. Staff interviews confirmed they would report any information to the Jail Administrator or Assistant Jail Administrator. Medical staff confirmed they would report sexual abuse or harassment to the Jail Administrator. Review of the medical assessment form confirmed that medical staff notify inmates of their limitations of confidentiality.

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

Policy 612 – Prison Rape Elimination Act (612.4) addresses this standard. Based on interviews with the Sheriff, Jail Administrator, and staff their priority is the safety of the inmate; immediate action would be taken to protect an inmate who is at substantial risk of imminent sexual abuse. In the twelve months prior to the audit, there has been zero instances the Facility has concluded that an inmate was subject to a substantial risk of imminent sexual abuse.

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

Policy 612 – Prison Rape Elimination Act (612.4.1) addresses this standard. In the twelve months prior to the audit, the Renville County Jail has received zero allegations from another agency than an inmate was sexually abused while in custody at the Renville County Jail. In the twelve months prior to the audit, the Renville County Jail received one report from an inmate that he/she was sexually abused while confined in another facility.

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

Policy 612 – Prison Rape Elimination Act (612.6) outlines the first responder duties for staff to follow after a report of a sexual assault. Interviews with staff verified they understand their responsibilities as a first responder following an alleged sexual assault which includes: separating the alleged victim from the alleged perpetrator; secure the scene; provide medical attention, and asking the victim not to wash, brush teeth, or shower to try to preserve any evidence. Policy states if the first responder is not a corrections officer, the responder shall request the alleged victim to refrain from any actions that could destroy physical evidence and then immediately notify a corrections officer. In the twelve months prior to the audit, there was one allegation that an inmate had been sexually abused.

Standard 115.65 Coordinated response

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These

recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

During the on-site audit, the Agency did not have 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.

On November 28, 2016 a copy of the Renville County Jail's Coordinated Response was received. The plan includes an outline of responsibilities for first responders, investigation officer, medical/mental health practitioners, and Administration.

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

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

The Sheriff and Jail Administration stated that the Renville County Sheriff's Office personnel are non-union. Administration would remove an alleged staff abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and what extent discipline is warranted.

Standard 115.67 Agency protection against retaliation

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

Policy 612 – Prison Rape Elimination Act (612.5) states that all inmates and staff who report sexual abuse or sexual harassment, or who cooperate with sexual abuse or sexual harassment investigations, shall be protected from retaliation. The Jail Administrator or the authorized designee shall assign a supervisor to monitor, for at least 90 days, the conduct and treatment of inmates or staff who report sexual abuse or sexual harassment, as well as inmates who were reported to have suffered sexual abuse, to determine if there is any possible retaliation. Monitoring may continue beyond 90 days if needed. Inmate monitoring shall also include periodic status checks. Interviews with the Sheriff and Jail Administrator confirmed they would use any measure necessary to protect inmates from retaliation using housing changes, transfer to another PREA compliant facility, and removal of alleged staff or inmate abusers from contact with the victims.

In the twelve months prior to the audit, there has been zero incidents that required monitoring for retaliation.

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

Policy 516 – Inmate Classification (516.10) addresses this standard. The Jail Administrator confirmed during his interview that protective custody would only be used as an alternative means of separation from likely abusers until an alternate means of separation could be arranged. Inmates at high risk for sexual victimization or who have alleged sexual abuse who are placed in involuntary segregation would be moved as soon as possible. In the twelve months prior to the audit, there has been zero inmates placed in involuntary segregated housing for one to twenty-four hours awaiting completion of their assessment, and there has been zero inmates placed in involuntary segregated housing for longer than thirty days while awaiting alternative placement

Standard 115.71 Criminal and administrative agency 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Policy 612 – Prison Rape Elimination Act (612.7); (612.7.1) reflects the requirements of this standard. The Renville County Sheriff’s Office has two investigators who have received specialized training pursuant to standard 115.34 who conduct the administrative and criminal investigations. All substantiated allegations of conduct that appear to be criminal will be referred for prosecution. The credibility of an alleged victim, suspect, or witness will be assessed on an individual basis and will not be determined by the person’s status as an inmate or staff. An inmate who alleges sexual abuse will not be required to submit to a polygraph examination or other truth telling device as a condition for proceeding with the investigation of an alleged allegation. Interviews with the Sheriff and Jail Administrator verified that an investigation would not be terminated because the alleged abuser or victim departs from employment or control the the jail or agency. In the twelve months prior to the audit, there was zero substantiated allegations of conduct that appeared to be criminal that were referred for prosecution.

Standard 115.72 Evidentiary standard for administrative 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Policy 612 – Prison Rape Elimination Act (612.1.7) states that the Jail Administrator or Sheriff shall review the investigation and determine whether any allegations of sexual abuse or sexual harassment have been substantiated by a preponderance of the evidence. The Sheriff confirmed that the evidentiary standard used is the preponderance of the evidence which was verified during the review of the investigation that was completed.

Standard 115.73 Reporting to inmates

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

Policy 612 – Prison Rape Elimination Act (612.7.2) states the Jail Administrator or the authorized designee shall inform a victim inmate in writing whether an allegation has been substantiated, unsubstantiated, or unfounded. If the Office did not conduct the investigation, the Office shall request relevant information from the investigative agency in order to inform the inmate. If a staff member is the accused (unless the Office has determined that the allegation was unfounded), the inmate shall also be informed whenever: the staff member is no longer assigned to the inmate’s unit or employed at the facility; or the Office learns that the staff member has been indicted or convicted on a charge related to sexual abuse within the facility. If another inmate is the accused, the alleged victim shall be notified whenever the office learns that the alleged abuser has been indicted or convicted on a charge related to sexual abuse within the facility. The Jail Administrator confirmed that the inmate victim would be notified of the final disposition of the investigation. In the twelve months prior to the audit, there was one inmate notified of the final disposition of an investigation.

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

Policy 612 – Prison Rape Elimination Act (612.7.1) outlines the disciplinary sanctions Renville County Jail staff are subject to for violating the Agency’s PREA policy. Staff shall be subject to disciplinary sanctions, up to and including termination for violating this policy. All discipline shall be commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to the law enforcement agency that would handle any related investigation and to any relevant licensing bodies. There was zero staff disciplined or terminated for violating the Agency’s sexual abuse or sexual harassment policy in the twelve months prior to the audit.

Standard 115.77 Corrective action for contractors and volunteers

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

Policy 612 – Prison Rape Elimination Act (612.81.) states any contractor or volunteer who engages in sexual abuse within the facility shall be immediately prohibited from having any contact with inmates. He/she shall be promptly reported to the law enforcement agency that would investigate such allegations and brought to the attention of any relevant licensing bodies. The Jail Administrator was clear that any contractor or volunteer found in violation of the Agency’s PREA policy would lose his/her access to work or volunteer at the Renville County Jail. In the twelve months prior to the audit, there was zero contractors or volunteers that lost access to the jail or was reported to law enforcement for engaging in sexual abuse of inmates

Standard 115.78 Disciplinary sanctions for inmates

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

Policy 600 – Inmate Discipline reflects the requirements of this standard. The Renville County Jail prohibits all sexual activity between inmates and will discipline inmates for such activity. The inmate handbook explains the facility rules, discipline, and the appeal process.

In the twelve months prior to the audit, there has been zero administrative findings of inmate-on-inmate sexual abuse and zero criminal findings of guilt for inmate-on-inmate sexual abuse that has occurred at the Facility.

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

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

The Health Assessment used by MEnD Correctional Care include questions related to PREA. If an inmate who discloses prior sexual victimization in an institutional or community setting would like to speak with mental health, the Assessor refers the inmate to mental health; an appointment will be scheduled within 14 days. MEnD Sexual Protocol only allows medical practitioners to disclose information related to an alleged sexual misconduct to those necessary per facility policy and to notify the alleged victim of their duty to report any allegation of sexual misconduct that occurred in an institutional setting. The medical staff verified during interviews that a referral would immediately be made to the MEnD medical provider and/or Behavioral Forensic Services for medical and or mental health services within 14 days of the inmate’s request.

Standard 115.82 Access to emergency medical and mental health services

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

Policy 612 – Prison Rape Elimination Act (612.11) addresses this standard. Inmate victims of sexual abuse will be provided emergent medical care at the facility and then transported to RC Hospital <http://www.rchospital.com/> who has SANE trained Registered Nurses. Forensic medical examinations will not be performed at the Renville County Jail. Inmate victims of sexual abuse while in jail will be offered information and access to emergency contraception and sexually transmitted infections prophylaxis free of charge in accordance with professionally accepted standards of care, where medically appropriate. Interviews with medical staff and the Jail Administrator verify the victim’s safety is a priority and the victim would not incur any financial cost for the medical care.

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

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

Policy 612 Prison Rape Elimination Act (612.11) and MEnD Nursing Protocol – requires inmates be offered medical and mental health services 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 including follow-up services, treatment plans, and referrals for continued care following their transfer or release from the jail. The treatment provided to the inmate at RC Hospital in Olivia, MN. would be provided without financial cost to the victim which would include pregnancy tests and all treatment for STD’s. Interviews with medical staff revealed that the level of care would be at or above community level of care. Follow-up services and treatments recommended from the SANE Registered Nurse would be reviewed by the medical provider and a treatment plan implemented at the jail taking into consideration the recommendations prepared by the SANE R.N.

Standard 115.86 Sexual abuse incident reviews

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

Policy 612 – Prison Rape Elimination Act (612.13) requires that an incident review ordinarily occur within thirty days of the conclusion of every sexual abuse investigation, unless the allegation has been determined to be unfounded. The Incident Review Team will consist of the Jail Administrator, Assistant Jail Administrator, investigator, medical staff, with input from the Jail Sergeants. The review team will take into consideration all the items listed in 115.68 (1-5). The Renville County Jail has had zero sexual abuse investigations that required a review of the incident. The incident review team has a packet with a checklist for completing sexual abuse incident reviews.

Standard 115.87 Data collection

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

Policy 612 – Prison Rape Elimination Act (612.14) addresses this standard. The Renville County Jail has a method of collecting aggregated data for every allegation of sexual abuse or harassment on an annual basis. The Renville County Jail is prepared to provide their data to the U.S. Department of Justice, upon request. The Jail Administrator is responsible for collecting and aggregating the data for dissemination.

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

Policy 612 – Prison Rape Elimination Act (612.14) addresses this standard. The Renville County Jail will review data on an annual basis and provide a report on their website: <http://www.renvillecountymn.com/sheriff/divisions/jail/PREA.php> which has been approved by the Sheriff. At the time of the audit, the Agency did not have data compiled for 2015, however the Agency will begin posting their information with the 2016 data that is being collected. If requested, the current data for 2016 is readily available at the Renville County Jail. Beginning In 2016 the Renville County Jail will complete and submit an annual report that will include PREA statistics of the current year’s data and corrective actions with those from prior years.

Standard 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion

must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Policy – 612 Prison Rape Elimination Act (612.14) addresses this standard. The Jail Administrator will securely retain collected sexual abuse data in his office and will maintain this data for at least ten years after the days of the initial collection unless federal, state, or local law requires otherwise. The Renville County Jail makes their data available on their website: <http://www.renvillecountymn.com/sheriff/divisions/jail/PREA.php> , the Renville County Jail, and the Annual Report.

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.

Darnel Carlson

December 9, 2016

Auditor Signature

Date