

Prison Rape Elimination Act (PREA) Audit Report

Adult Prisons & Jails

☐ Interim ☒ Final

Date of Report May 15, 2020

Auditor Information

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Company Name: Click or tap here to enter text.

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City, State, Zip: Brainerd, MN 56401

Telephone: 218-831-9636

Date of Facility Visit: October 23-24, 2019

Agency Information

Name of Agency:

Renville County Jail

Governing Authority or Parent Agency (If Applicable):

Renville County Sheriff's Office

Physical Address: 104 4th Street South

City, State, Zip: Olivia, MN 56277

Mailing Address: 105 5th Street South

City, State, Zip: Olivia, MN 56277

Telephone: 320-523-1161

Is Agency accredited by any organization? ☐ Yes ☒ No

The Agency is:

☐ Military

☐ Private for Profit

☐ Private not for Profit

☐ Municipal

☒ County

☐ State

☐ Federal

Agency mission: It is the mission of the Renville County Jail to provide for the safe, secure, and humane detention of offenders brought into 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.

Agency Website with PREA Information:

<https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/PREA.php>

Agency Chief Executive Officer

Name: Scott Hable

Title: Sheriff

Email: ScottH@renvillecountymn.com

Telephone: 320-523-3771

Agency-Wide PREA Coordinator

Name: Ned Wohlman

Title: Jail Administrator

Email: NedW@renvillecountymn.com		Telephone: 320-523-3778	
PREA Coordinator Reports to: Sheriff		Number of Compliance Managers who report to the PREA Coordinator 0	
Facility Information			
Name of Facility: Renville County Jail			
Physical Address: 104 4th Street South Olivia, MN 56277			
Mailing Address (if different than above): 105 5th Street South Olivia, MN 56277			
Telephone Number: 320-523-3600			
The Facility Is:	<input type="checkbox"/> Military	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Private not for profit
<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> County	<input type="checkbox"/> State	<input type="checkbox"/> Federal
Facility Type:	<input checked="" type="checkbox"/> Jail	<input type="checkbox"/> Prison	
Facility Mission: It is the mission of the Renville County Jail to provide for the safe, secure, and humane detention of offenders brought into 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			
Facility Website with PREA Information: https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/PREA.php			
Warden/Superintendent			
Name: Ned Wohlman		Title: Jail Administrator	
Email: NedW@renvillecountymn.com		Telephone: 320-523-3778	
Facility PREA Compliance Manager			
Name: Click or tap here to enter text.		Title: Click or tap here to enter text.	
Email: Click or tap here to enter text.		Telephone: Click or tap here to enter text.	
Facility Health Service Administrator			
Name: Dr. Todd Leonard		Title: CEO – MENd Correctional Care	
Email: tleonard@mendcare.com		Telephone: 320-774-1080	
Facility Characteristics			
Designated Facility Capacity: 72		Current Population of Facility: 49	
Number of inmates admitted to facility during the past 12 months			861

Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more:		177	
Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more:		583	
Number of inmates on date of audit who were admitted to facility prior to August 20, 2012:		0	
Age Range of Population:	Youthful Inmates Under 18: 14-17	Adults: 18-99	
Are youthful inmates housed separately from the adult population?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
		<input type="checkbox"/> NA	
Number of youthful inmates housed at this facility during the past 12 months:		1	
Average length of stay or time under supervision:		23.2 days	
Facility security level/inmate custody levels:		1 – Minimum; 2 – Medium ; 3 - Maximum	
Number of staff currently employed by the facility who may have contact with inmates:		13	
Number of staff hired by the facility during the past 12 months who may have contact with inmates:		4	
Number of contracts in the past 12 months for services with contractors who may have contact with inmates:		2	
Physical Plant			
Number of Buildings: 1		Number of Single Cell Housing Units: 0	
Number of Multiple Occupancy Cell Housing Units:		8	
Number of Open Bay/Dorm Housing Units:		0	
Number of Segregation Cells (Administrative and Disciplinary):		1	
Description of any video or electronic monitoring technology (including any relevant information about where cameras are placed, where the control room is, retention of video, etc.): Facility has video monitoring integrated into the security system. There are multiple cameras throughout the facility with retention for a specified period. Security equipment is in the dispatch center. The dispatch center monitors perimeter doors, jail staff monitor cameras within the secured perimeter of the jail. The facility recently replaced 2 DVRs with 2 new NVRs.			
Medical			
Type of Medical Facility:		On-site clinic operated by MEN D Correctional Care – contracted service	
Forensic sexual assault medical exams are conducted at:		Olivia Hospital	
Other			
Number of volunteers and individual contractors, who may have contact with inmates, currently authorized to enter the facility:		43	
Number of investigators the agency currently employs to investigate allegations of sexual abuse:		2	

Audit Findings

Audit Narrative

The Prison Rape Elimination Act (PREA) on-site audit of the Renville County Jail located in Olivia Minnesota was conducted October 23-24, 2019. Pre-Audit preparation included a review of the Agency's PREA information published on their website and outlining questions and documentation that would be requested from the agency. On the first day of the on-site audit, the Jail Administrator provided a three-ring binder separated with tabs for each standard. The information in each tab included relevant policies, procedures, forms, educational materials, training information and other PREA related materials. The binder also included a copy of the completed Pre-Audit Questionnaire, the agency's mission, vision, and value statements, inmate handbook, and a copy of the PREA policy. During the on-site audit, a review of the binder contents was completed which prompted questions and requests for additional documentation. Answers to the questions were provided by the Jail Administrator/PREA Coordinator. The staff schedule and inmate roster were provided on the first day of the on-site audit. Audit notices were provided to the Renville County Jail six weeks before the audit. The audit notices were posted in visible areas throughout the facility. I did not receive any inmate correspondence throughout the audit process. The audit notices were still posted throughout the facility during the on-site audit.

During the two days of the on-site audit, the auditor was provided an open office next to the Assistant Jail Administrator to work and conduct confidential interviews with staff and inmates in the Renville County Jail. The office was secured with a locked door and located within the secure perimeter of the jail. Formal personal interviews were conducted with facility staff, inmates, volunteers, and contractors. Eight facility staff members were interviewed representing both shifts. Included in the facility staff member interviews were random staff, intake staff, intermediate-or-higher-level facility staff who conduct unannounced rounds, and investigative staff. Also interviewed were two volunteers and two contractors, a medical staff member, the Sheriff, the Jail Administrator/PREA Coordinator. Additional interviews with the Jail Administrator included designated staff member charged with monitoring for retaliation, administrative/HR staff, agency contract administrator and incident review team member. Interviews with staff who perform risk screenings were not conducted. During the first interview it was identified that risk screenings were not being conducted. The facility has resumed using the risk screening tool, verification was provided during the correction period. Ten inmates were interviewed which meets the required number of inmate interviews based on the jail population of 49 inmates. Included in the ten inmate interviews were eight random inmates, one transgender inmate and one gay inmate. Personal files were reviewed to determine compliance with training mandates, background check procedures and on-going background checks every 5 years of staff and contractors. Inmate files were reviewed to evaluate screening and intake procedures. Also reviewed was inmate education documentation, and the Inmate Resign PREA Log to verify inmate training acknowledgments. The Renville County Jail reported zero allegations of substantiated, unsubstantiated, or unfounded reports of sexual abuse and sexual harassment. The Renville County Jail employs 19 employees which include the Jail Administrator, Assistant Jail Administrator, 2 Sergeants, 1 Program Director, 12 full-time correctional officers and 2 part-time correctional officers.

A facility tour was conducted by the Jail Administrator/PREA Coordinator. All areas of the facility were toured which included (jail administration, booking, kitchen, laundry, medical, programs areas, staff breakroom, and 8 housing areas). The auditor observed location of cameras, staff supervision of inmates, placement of posters, PREA information resources, and security monitoring. The auditor observed toilets, sinks and showers were in each individual cell. The auditor was given access to all

areas of the facility and talked to staff and inmates informally during walk-throughs of the facility during the visit.

The Jail Administrator has implemented a unique management style that allows for a smooth operating facility. Staff and inmates feel safe working and living in the facility. Staff were friendly and open to providing information. Staff and inmates were always made readily available to the auditor. The Administration of the Renville County Jail are dedicated to continuous improvement, managing staffing levels and fostering a culture of zero-tolerance of sexual abuse and harassment of inmates. The Sheriff and Jail Administrator were open and readily available during the on-site audit.

On December 9, 2016, the Renville County Jail was found in compliance with the PREA standards.

Facility Characteristics

The Renville County Jail is a class III facility under the Minnesota Department of Corrections (MNDOC) 2911 rules governing adult detention facilities in Minnesota. The Renville County Jail is provisionally licensed and inspected by the MNDOC to determine continued compliance with Minnesota Chapter 2911 rules governing adult detention facilities in Minnesota. On September 24, 2019, the U.S. Department of Justice conducted an interim monitoring inspection. There were no deficiencies noted and facility staff members were commended on their dedication to duty. Renville County Jail utilizes the indirect supervision model in design concept and inmate supervision.

The Renville County Jail is a one level building with a current design capacity of 72 inmates. There were 33 adult male, 16 adult female inmates and zero juvenile inmates in custody on the first day of the PREA audit. The Renville County Jail houses pre-trial and pre-sentence inmates and sentenced inmates for a time not to exceed any limits set by Minnesota Statutes. The Renville County Jail maintains a housing contract with the Department of Corrections (DOC) to hold State inmates for the Housed-out Offender Program and housing for Supervised Release offenders. The Federal Bureau of Prisons and other Minnesota County Agencies.

The essential functions that include booking, kitchen, laundry, program areas, gym, Assistant Jail Administrator's office and a medical exam room are located off the main corridor. The Jail Administrator has an office located in the Sheriff's Office that is attached to the jail. Inmate workers are used in the laundry room and to clean inside the jail. There are 8 housing areas, 2 special management units with a small dayroom and 2 double bunked cells, 2 four cell double bunked units with 2 cells on the upper tier and 2 cells on the lower tier with a main dayroom on the lower tier, 2 four cell double bunked units with 2 cells on the upper tier and 2 cells on the lower tier. The 2 cells on the lower tier are in a sub-dayroom off the main dayroom and 2 – 8 cell double bunked units with 4 cells on the upper tier and 4 cells on the lower tier with a main dayroom on the lower tier.

There are 3 individual holding cells in booking there is a camera in each cell, the cameras can be turned off or on with a switch system. There is a large officer station in the middle of the jail that is split into a booking desk and housing desk. Staff can move between each area through a door. There is a transfer cell with a door on the secured vehicle sally-port side and a door on the booking side used for uncooperative intakes. Off booking is a pre-book area where the programmer's office is located. A restroom located in pre-book is used as the inmate change area. Pat and clothing searches of inmates are conducted before the inmate is moved to the booking area. There are cameras covering the pre-book area, the restroom does not have a camera.

There is a huber locker room used by work release to leave and enter the building. There is a designated work release lobby equipped with video surveillance.

The kitchen has a meal preparation area, dishwasher station, walk-in cooler and freezer and an office for the contracted staff's use.

The medical room consists of an exam room and a desk for the nurse.

The Renville County Jail contracts with Summit Food Service <http://summitfoodservice.com/> who provide contracted staff to prepare inmate meals. Meals are prepared on-site and delivered to the inmate housing units. Inmate workers are not used in the kitchen. Inmate workers are used in the laundry room and are responsible for cleaning linens, towels, and clothing for the facility. Inmate workers in the laundry are supervised by security staff, monitored via camera.

The Renville County Jail contracts with MEND Correctional Care <https://mendcare.com/> to provide licensed medical professionals to deliver healthcare to the inmates. The medical clinic within the jail is set-up to provide emergent level treatment and triage. Inmates are transported to the emergency department or specialty appointments for advanced or specialized medical treatment. Renville County has a separate contract to provide mental health services as needed.

The Renville County Jail has several program areas for inmates to use. Program areas include a law library, small classroom, office for the treatment counselor, large classroom, and gym. The Huber program is offered to inmates who are sentenced and approved to leave the facility, the Huber program gives inmates that qualify the opportunity to continue working for their employer during their incarceration. The Renville County Jail has an inmate work program that supplies inmate workers to work in laundry and clean inside the secured perimeter of the jail.

Programs are offered to inmates on a various set schedule. The jail offers religious programs, substance abuse programs, indoor recreation, anger management, parenting classes, cognitive skills, re-entry, GED, library, and Safe Avenues as needed.

The Renville County Jail uses a video visitation system to accommodate visits between inmates and their friends and family which are recorded. The jail has visitation kiosks for the public located in the main lobby of the Law Enforcement Center.

Summary of Audit Findings

During the past 12 months, the Renville County Jail reported zero allegations of substantiated, unsubstantiated, or unfounded reports of sexual abuse and sexual harassment.

Interviews with inmates demonstrated they are provided PREA and understood the agency's zero-tolerance policy. During the intake process inmates are given information on the agency's zero tolerance policy. An inmate is given an inmate handbook before being placed in a housing unit. The inmate handbook outlines the facility's zero-tolerance policy, how to report incidents of sexual abuse and sexual harassment, and additional educational information. The Program Director meets with inmates daily. Inmate names that are scheduled to be provided PREA education are printed on a PREA log generate every day. Inmates sign an acknowledgment that is placed in the PREA Resign Logbook. Inmates interviewed reported they felt safe at the facility and believed that staff would respond to any report of sexual abuse or harassment.

Interviews with staff demonstrated initial and ongoing PREA training. Staff was knowledgeable about their responsibilities in detecting, preventing, reporting, and responding to sexual abuse and sexual harassment. Staff was able to articulate the different ways inmates and staff could report sexual abuse or sexual harassment and steps to follow if he/she were the first to respond to an incident. Staff expressed confidence that their administration takes all reports of sexual abuse and sexual harassment seriously and would investigate every allegation and would not tolerate any form of retaliation against staff or inmates. Staff reported they felt safe at work.

An interview was conducted with an intersex inmate who reported the facility was very responsive and concerned about his/her safety. The inmate was housed in general population. At the inmate's request he/she was moved to an individual cell. The inmate stated staff ensured the inmate felt safe and comfortable with the housing decision.

An interview was conducted with a gay inmate who reported feeling safe at the facility and was placed in general population.

After a review of documentation, staff and inmate interviews, this auditor found the facility leadership promotes a culture of zero-tolerance for sexual abuse and sexual harassment and are sensitive to providing programming within their scope to support an inmate's success after release.

The Renville County Jail exceeded zero standards; met 45 standards and zero standards were not met.

Number of Standards Exceeded: 0

000.00

Number of Standards Met: 45

115.11-115.89 115.401; 115.403

Number of Standards Not Met: 0

000.00

Summary of Corrective Action (if any)

The Renville County Jail was found to be out of compliance with Standard 115.41. The Renville County Jail has a comprehensive assessment tool to determine if the inmate is a likely victim or predator. Since the last PREA audit the facility updated their classification questions by incorporating questions from the Adverse Childhood Experiences (ACES) questionnaire resulting in the loss of most of the PREA risk assessment tool.

To meet this standard, the agency should start asking the questions listed on their Sexual Violence Prevention (PREA) Checklist.

On May 11, 2020, the auditor was provided copies of completed risk screenings that ranged from November 2019 – April 2020. The copies represented completed risk screenings for male and female inmates.

The Renville County Jail was found to be out of compliance with Standard 115.42 The Renville County Jail has a comprehensive assessment tool to determine if the inmate is a likely victim or predator. Since the last PREA audit the facility updated their classification questions by incorporating questions from the Adverse Childhood Experiences (ACES) questionnaire resulting in the loss of most of the PREA risk assessment tool.

To meet this standard, the agency should start asking the questions listed on their Sexual Violence Prevention (PREA) Checklist.

On May 11, 2020, the auditor was provided copies of completed risk screenings that ranged from November 2019 – April 2020. The copies represented completed risk screenings for male and female inmates.

PREVENTION PLANNING

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

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

115.11 (a)

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

115.11 (b)

- Has the agency employed or designated an agency-wide PREA Coordinator? ☒ Yes ☐ No
- Is the PREA Coordinator position in the upper-level of the agency hierarchy? ☒ Yes ☐ No
- Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?
☒ Yes ☐ No

115.11 (c)

- If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.) ☐ Yes ☐ No ☒ NA
- Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)
☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

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

A. The Renville County Jail has implemented a zero-tolerance policy as detailed in policy #612 which comprehensively addresses the agency's approach to preventing, detecting, and responding to all forms of sexual abuse and sexual harassment. The policy outlines prohibited behavior and

contains the essential definitions outlined in the PREA standards. Policy #317 establishes the foundation for the agency's training efforts with inmates, staff, volunteers, and contractors.

- B.** The Renville County Jail has a designated PREA Coordinator, Ned Wohlman, Jail Administrator who reports to the Sheriff. The PREA Coordinator reports to have sufficient time and authority to develop, implement, and oversee the agency's efforts toward PREA compliance at the Renville County Jail. The appointment of an Agency PREA Coordinator is outlined in the PREA Policy #612.3.

- C.** Renville County operates one facility.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Renville County Jail policy #317
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

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

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

115.12 (a)

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

115.12 (b)

- Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates OR the response to 115.12(a)-1 is "NO".) ☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

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

- A.** This standard is not applicable. Renville County does not have any housing contracts with other agencies for the confinement of their inmates. If Renville County has a need in the future to house an inmate, the agency would use a PREA compliant facility.
- B.** Renville County maintains contracts with the Federal Bureau of Prisons, Minnesota Department of Corrections, and the Minnesota Department of Corrections Intensive Supervised Release Offenders (ISR).

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Federal and State Contract Agreements

Standard 115.13: Supervision and monitoring

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

115.13 (a)

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

- Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring? ☒ Yes ☐ No
- Does the agency ensure that each facility's staffing plan takes into consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring? ☒ Yes ☐ No
- Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring? ☒ Yes ☐ No ☐ NA
- Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring? ☒ Yes ☐ No
- Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring? ☒ Yes ☐ No
- Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring? ☒ Yes ☐ No

115.13 (b)

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

115.13 ©

- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section? ☒ Yes ☐ No
- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies? ☒ Yes ☐ No
- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan? ☒ Yes ☐ No

115.13 (d)

- Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? ☒ Yes ☐ No

- Is this policy and practice implemented for night shifts as well as day shifts? ☒ Yes ☐ No
- Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

The Renville County Jail reports that the average daily population of the facility is 50. On the first day of the on-site audit there were 49 inmates in custody, the staffing plan is based on an average daily population of 72 inmates.

- A.** The Renville County Jail has a formalized, written staffing plan which includes considerations (1-11) in "a" of this standard and according to the rules and regulations set by the Minnesota Department of Corrections (MNDOC) (2911.0900).
- B.** The Renville County Jail does not deviate from its staffing plan. Part-time correctional officers or voluntary or mandated overtime would be used to maintain minimum staffing. The Renville County Jail reports zero deviations from the staffing plan.
- C.** The Renville County Jail's PREA policy #248 requires the PREA Coordinator to review the staffing plan a minimum of once per year.
- D.** The Renville County Jail conducts and documents unannounced rounds on all shifts as outlined in PREA policy #612. Facility policy prohibits staff from alerting other staff about unannounced rounds.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail policy #248
- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Review of the staffing plan
- Unannounced rounds review
- Interview with Jail Administrator (PREA Coordinator)
- Interview with Assistant Jail Administrator

Standard 115.14: Youthful inmates

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

115.14 (a)

- Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☒ Yes ☐ No ☐ NA

115.14 (b)

- In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☒ Yes ☐ No ☐ NA
- In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☒ Yes ☐ No ☐ NA

115.14 (c)

- Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☒ Yes ☐ No ☐ NA
- Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☒ Yes ☐ No ☐ NA
- Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates [inmates <18 years old].) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

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

The Renville County Jail reports that there has been 1 juvenile inmate housed at the Renville County Jail in the past 12 months.

A-C. The Minnesota Department of Corrections has issued a provisional license for the Renville County Jail to house juvenile offenders up to 24 hours. Youthful inmates would be housed at Prairie Lakes located in Willmar, Minnesota. The agency reports that a youthful inmate will be held in the booking area separate from adult inmates overnight for court the next morning. The holding cell where the youthful inmate is held would be identified as juvenile male or female on the nametag.

On the dates of the on-site audit, there were zero youthful offenders in custody.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail policy #512
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

Standard 115.15: Limits to cross-gender viewing and searches

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

115.15 (a)

- Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?
☒ Yes ☐ No

115.15 (b)

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

115.15 (c)

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

115.15 (d)

- Does the facility implement a policy and practice that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? ☒ Yes ☐ No
- Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit? ☒ Yes ☐ No

115.15 (e)

- Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status? ☒ Yes ☐ No
- If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner? ☒ Yes ☐ No

115.15 (f)

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

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail policy #528 prohibits staff from conducting cross-gender strip searches or cross-gender visual body cavity searches except in exigent circumstances or when performed by medical practitioners. The Agency reports that in the past 12 months, there has been zero cross-gender strip or cross-gender visual body cavity searches of inmates. Also, in the past 12 months, there has been zero cross-gender strip or cross-gender visual body cavity searches of inmates that did not involve exigent circumstances or were performed by non-medical staff.
- B.** The Renville County Jail policy PREA #528 prohibits male staff from conducting pat-down searches of female inmates, absent exigent circumstances. The Agency reports that in the past 12 months, there has been zero pat-down searches of female inmates conducted by male staff. Also, in the past 12 months, there has been zero pat-down searches of female inmates that did not involve exigent circumstances. Random staff and inmate interviews verified there is always a female working and female inmates are always able to attend out of cell activities.
- C.** The Renville County Jail PREA policy 528 requires cross-gender searches to be documented. The Agency reports that it has conducted zero cross-gender strip searches of male or female inmates in the past 12 months. The Agency also reports zero cross-gender pat-down searches of female inmates by male staff in the past 12 months.

- D.** The Renville County Jail PREA policy #528 ensures inmates can shower, change clothing, and perform bodily functions with privacy. The policy and facility practice requires a staff member of the opposite gender to announce their presence when entering an inmate housing unit. Random staff and inmate interviews verify this as the policy and practice of the facility.
- E.** The Renville County Jail PREA policy #528 prohibits jail staff from searching or physically examining a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. Random staff interviews confirmed this to be the facility's practice.
- F.** The Renville County Jail reports that 100 percent of their staff have been trained to conduct cross-gender pat-down searches and searches of transgender/intersex inmates in a professional and respectful manner. Staff was able to explain and/or demonstrate the pat-down search training they received.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #528
- Completed Pre-Audit Questionnaire submitted by the Agency
- Random staff interviews
- Random inmate interviews
- Interview with Transgender inmate
- Training curriculum and training records

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

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

115.16 (a)

- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect,

and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities? ☒ Yes ☐ No

- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities? ☒ Yes ☐ No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes)? ☒ Yes ☐ No
- Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing? ☒ Yes ☐ No
- Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? ☒ Yes ☐ No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities? ☒ Yes ☐ No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills? ☒ Yes ☐ No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Are blind or have low vision? ☒ Yes ☐ No

115.16 (b)

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

115.16 (c)

- Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

Instructions for Overall Compliance Determination Narrative

- A.** The Renville County Jail ensures key information about the Prison Rape Elimination Act (PREA) is continuously and readily available or visible to inmates through posters, inmate handbook and PREA brochure. The facility utilizes Language Line Translation Services and an in-house interpreter to provide sign language services. Allowing disabled and limited English proficient inmates equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and harassment.
- B.** The Renville County Jail utilizes the Language Line, in-house interpreter services, and a Spanish version of the inmate handbook and other documents to provide inmates with limited English proficiency equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and harassment.
- C.** The Renville County Jail PREA policy #604 prohibits using inmate interpreters except in limited circumstances where a delay in obtaining an interpreter could compromise inmate safety.

During the on-site audit, there were zero inmates with disabilities or limited English proficient inmates in custody. The Renville County Jail reports there have been zero instances in the past 12 months, of inmate interpreters, readers, or another type of inmate assistant used to assist in first responder's duties, or the investigation of the inmate's allegations.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail policy #604
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interview with Sheriff Scott Hable
- Random staff interviews
- Language line contact information

Standard 115.17: Hiring and promotion decisions

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

115.17 (a)

- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? ☒ Yes ☐ No

- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? ☒ Yes ☐ No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? ☒ Yes ☐ No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? ☒ Yes ☐ No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? ☒ Yes ☐ No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? ☒ Yes ☐ No

115.17 (b)

- Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates? ☒ Yes ☐ No

115.17 (c)

- Before hiring new employees, who may have contact with inmates, does the agency: perform a criminal background records check? ☒ Yes ☐ No
- Before hiring new employees, who may have contact with inmates, does the agency: consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse? ☒ Yes ☐ No

115.17 (d)

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

115.17 (e)

- Does the agency either conduct criminal background records check at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees? ☒ Yes ☐ No

115.17 (f)

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

115.17 (g)

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

115.17 (h)

- Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

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

A. The Renville County Jail Specialized Assignments and Promotions policy #114 and Selection Process policy #307 prohibits the hiring or promotion of anyone who may have contact with inmates and prohibits enlisting the services of any contractor who may have contact with inmates who has the prohibited conduct specified in paragraph "a" (1-3) of this standard.

B. Any incidents of sexual harassment will be considered in determining whether to hire or promote anyone or to enlist the services of any contractor, who may have contact with inmates. Renville

County Jail Specialized Assignments and Promotions policy #114 and Selection Process policy #307

- C. The Renville County Jail Selection Process policy #307 states every person who may have inmate contact as a member or contractor shall, prior to service, undergo a thorough background investigation. A criminal background record check is performed through the Minnesota Bureau of Criminal Apprehension (BCA) which includes local, State, Federal, and predatory offender registers.
- D. A criminal record check is performed through the Minnesota Bureau of Criminal Apprehension (BCA) which includes local, State, Federal, and predatory offender registers on all new contractors who may have contact with inmates prior to assuming duties.
- E. The Renville County Jail Selection Process policy #307 states criminal background records checks will be conducted at least every five years on members or contractors who may have contact with inmates. This information was verified during the interview with the Sheriff and PREA Coordinator.
- F. The Renville County Jail asks about misconduct outlined in paragraph "a" of this standard during interviews for hiring or promoting employees. The Renville County Jail does not complete annual staff evaluations. Policy does require employees to disclose any misconduct outlined in paragraph "a" of this standard
- G. The Renville County Jail Selection Process policy #307 outlines the requirement of this standard.
- H. The PREA Coordinator confirmed during an interview that information would be shared about previous employee misconduct if requested and not prohibited by law.

The facility reports that in the past 12 months, 4 persons hired who may have contact with inmates received criminal background records checks.

The facility reports that in the past 12 months, there was 1 contract for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with inmates.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail Specialized Assignments and Promotions policy #114
- Renville County Jail Selection Process policy #307
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Review of criminal record background checks
- PREA Compliance Criminal History Check Log

Standard 115.18: Upgrades to facilities and technologies

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

115.18 (a)

- If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)
☐ Yes ☐ No ☒ NA

115.18 (b)

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

Auditor Overall Compliance Determination

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

A. Since the last PREA Audit, the Renville County Jail has not acquired a new facility or made a substantial expansion to the existing facility.

B. The Renville County Jail has replaced old DVRs with new NVRs. The agency is in the process of upgrading their security system which includes the addition of new cameras and audit. The new NVRs will integrate with the new security system.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Interview with Jail Administrator New Wohlman (PREA Coordinator)
- Contractor quotes for additional cameras and wiring

RESPONSIVE PLANNING

Standard 115.21: Evidence protocol and forensic medical examinations

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

115.21 (a)

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

115.21 (b)

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

115.21 (c)

- Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate? ☒ Yes ☐ No
- Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? ☒ Yes ☐ No
- If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? ☒ Yes ☐ No
- Has the agency documented its efforts to provide SAFEs or SANEs? ☒ Yes ☐ No

115.21 (d)

- Does the agency attempt to make available to the victim a victim advocate from a rape crisis center? ☒ Yes ☐ No
- If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? ☒ Yes ☐ No
- Has the agency documented its efforts to secure services from rape crisis centers?
☒ Yes ☐ No

115.21 (e)

- As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews? ☒ Yes ☐ No
- As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals? ☒ Yes ☐ No

115.21 (f)

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

115.21 (g)

- Auditor is not required to audit this provision.

115.21 (h)

- If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? [N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.] ☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

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

- A.** The Renville County Sheriff's Office conducts criminal and administrative sexual abuse and sexual harassment investigations.
- B.** The Renville County Sheriff's Office Sexual Assault Investigations policy outlines the protocol for conducting sexual abuse investigations. The investigator interviewed who conducts criminal investigations was able to explain the investigatory protocols used for conducting criminal sexual abuse and harassment investigations at the facility.
- C.** Forensic medical examinations will be conducted at Olivia Hospital located in Olivia, Minnesota <https://oliviahospital.com/>. The Olivia Hospital has two SANE trained registered nurses on staff. The Renville County Sheriff's Office has a signed agreement with the hospital to provide care for

sexual assault victims from the Renville County Jail as needed through the hospital's emergency department. Sexual abuse victims transported from the jail are treated the same as someone from the community would be treated. Treatment services would be provided without financial cost to the victim.

D. The Renville County Jail has a signed Memorandum of Understanding (MOU) to provide victim support services with Safe Avenues <https://www.willmarshelter.com/locations>. At the request of a victim, an advocate will accompany the victim through the forensic medical examination and investigatory interviews. These services would also provide emotional support, crisis intervention and information.

E. The signed MOU between the Renville County Jail and Safe Avenues <https://www.willmarshelter.com/locations> agrees to provide victim advocate services and emotional support services to inmate victims of sexual abuse.

F. The Renville County Sheriff's Office conducts the investigations into allegations of sexual abuse.

The Renville County Jail reported zero forensic medical examinations conducted in the past 12 months.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Olivia Hospital <https://oliviahospital.com/> signed agreement
- Safe Avenues <https://www.willmarshelter.com/locations> Memorandum of Understanding (MOU)
- Random staff interviews
- Interview with an Investigator
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

Standard 115.22: Policies to ensure referrals of allegations for investigations

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

115.22 (a)

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

115.22 (b)

- Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? ☒ Yes ☐ No

- Has the agency published such policy on its website or, if it does not have one, made the policy available through other means? ☒ Yes ☐ No
- Does the agency document all such referrals? ☒ Yes ☐ No

115.22 (c)

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

115.22 (d)

- Auditor is not required to audit this provision.

115.22 (e)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail reported that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. The Agency reported receipt of zero allegations of sexual abuse and sexual harassment during the past 12 months.
- B.** The Renville County Jail PREA policy #612 ensures that allegations of sexual abuse or harassment are referred for investigation. The Agency publishes their policy regarding the referral of allegations of sexual abuse or harassment for criminal investigations on its website <https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/PREA.php>.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Renville County website: <https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/PREA.php>
- Interview with Sheriff Scott Hable
- Interview with a Sheriff's Office investigator

TRAINING AND EDUCATION

Standard 115.31: Employee training

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

115.31 (a)

- Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates? ☒ Yes ☐ No
- Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities? ☒ Yes ☐ No

115.31 (b)

- Is such training tailored to the gender of the inmates at the employee's facility? ☒ Yes ☐ No
- Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa? ☒ Yes ☐ No

115.31 (c)

- Have all current employees who may have contact with inmates received such training?
☒ Yes ☐ No
- Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures? ☒ Yes ☐ No
- In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies? ☒ Yes ☐ No

115.31 (d)

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

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail PREA policy #317 outlines the training topics all employees who have contact with inmates receive training on preventing, detecting, and responding to sexual abuse and sexual harassment of inmates. All staff have received training on the eleven topics listed in paragraph "a" of this standard.
- B.** The training was designed for the unique needs of the inmates in the facility to include cross-gender supervision and respectful searching techniques. The Renville County Jail operates one building which houses adult male and female inmates and juveniles for up to 24 hours.
- C.** The Renville County Jail provides all employees training on the Prison Rape Elimination Act (PREA) during orientation, annually and quarterly reviews.
- D.** The Agency documents all training, employees are required to sign an acknowledgment of receipt and understanding of training.

During the on-site audit, the PREA Coordinator reviewed the new PREA training curriculum that was being implemented for employees. The new curriculum met the criteria for training outlined in this standard.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #317
- Completed Pre-Audit Questionnaire submitted by the Agency
- PREA Training Plan
- Training records review

- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Random staff interviews

Standard 115.32: Volunteer and contractor training

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

115.32 (a)

- Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures? ☒ Yes ☐ No

115.32 (b)

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

115.32 (c)

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

Auditor Overall Compliance Determination

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

A. The Renville County Jail trains all volunteers and contractors who have contact with inmates on their responsibilities regarding sexual abuse and sexual harassment of inmates. The contracted medical provider MEnD Correctional Care provides their employees PREA training every two years on the eleven topics outlines in paragraph "a" in standard 115.31. Refresher information is provided to MEnD contract employees in years which employees do not receive refresher training. Refresher information includes review of the PREA policy and articles relevant to preventing, detecting, and responding to sexual abuse and sexual harassment. The contracted food service provider Summit Food Service provides training for their employees every two years on the eleven topics outlined in paragraph "a" in standard 115.31. Summit provides quarterly staff training on topics related to the food service industry and PREA. The Summit contracted food service employees do not have direct one-on-one contact with inmates.

B. The Assistant Jail Administrator facilitates volunteer training. The Assistant Jail Administrator has a face-to-face meeting with each volunteer and covers applicable jail rules and regulations, general

expectations of volunteers, the lines of authority, responsibility, and accountability for volunteers. The volunteers are provided links to complete PREA training. The agency reports that there is usually a correctional officer present when a volunteer meets with multiple inmates. One-on-one meetings are monitored through the video monitoring system.

- C.** The Agency documents all training, volunteers and contractors are required to sign an acknowledgment of receipt and understanding of their training. MEnD Correctional Care requires their employees to sign an acknowledgement training. Summit Food Service requires their employees to sign an acknowledgement of training.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #317
- Completed Pre-Audit Questionnaire submitted by the Agency
- Signed PREA acknowledgment forms for volunteers
- Renville County Training Plan
- PREA training materials for volunteers
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interview with Assistant Jail Administrator
- Random interviews with volunteers
- Random interviews with contracted employees
- MEnD PREA Training Curriculum
- Summit Food Service Training Curriculum

Standard 115.33: Inmate education

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

115.33 (a)

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

115.33 (b)

- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment? ☒ Yes ☐ No
- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents? ☒ Yes ☐ No
- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents? ☒ Yes ☐ No

115.33 (c)

- Have all inmates received such education? ☒ Yes ☐ No
- Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?
☒ Yes ☐ No

115.33 (d)

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

115.33 (e)

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

115.33 (f)

- In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

A. The Renville County Jail reports that 813 inmates have been admitted in the past 12 months and 177 of those inmates' length of stay was for 30 days or more. Inmates are provided with the

agency's PREA Notification that outlines the Renville County Jail's zero-tolerance policy and how to report incidents or suspicions of sexual abuse and harassment during the booking process. Intake staff and inmate interviews confirmed this information is provided at intake. Inmates are given an inmate handbook before being assigned to housing. The handbook contains more comprehensive PREA education information.

- B.** Within 30 days the Program Director has an initial meeting with each inmate to go over PREA education materials including how to report incidents or suspicions of sexual abuse or harassment; right to be free from sexual abuse and harassment and to be free from retaliation for reporting incidents; and the agency's policies and procedures for responding to allegations of sexual abuse or harassment. During the meeting, the Program Director goes over several other topics with each inmate to ensure each inmate has access to the programming and resources they need. Interviews with random staff and inmates confirmed inmates are given a PREA Notification during the booking process and an inmate handbook containing PREA education information.
- C.** The Renville County Jail provides every inmate with PREA education.
- D.** The Renville County Jail has a Spanish version of the inmate handbook available. PREA training is available for the visually impaired, limited English proficient, deaf, or hard of hearing, or limited reading skills. Interpretive services are available for limited English speaking or deaf or hard of hearing inmates. A verbal orientation by a staff member will be provided for inmates that have limited reading skills.
- E.** Upon completion of the initial meeting with the Program Director, the inmate signs an acknowledgment confirming receipt and understanding the PREA training. Renville County maintains a PREA Resign binder with signed inmate acknowledgments. Every day a PREA re-sign list is generated which the Program Director uses to meet with inmates.
- F.** Key information about PREA is continuously and readily available or visible through posters throughout the facility and the inmate handbook.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail Inmate Handbook and Orientation policy #506
- Completed Pre-Audit Questionnaire submitted by the Agency
- Inmate Handbook
- PREA posters displayed throughout the facility
- Renville County inmate acknowledgment forms (Resign Binder)
- Interviews with intake staff
- Interviews with random inmates
- Interview with Program Director

Standard 115.34: Specialized training: Investigations

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

115.34 (a)

- In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) ☒ Yes ☐ No ☐ NA

115.34 (b)

- Does this specialized training include techniques for interviewing sexual abuse victims? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA
- Does this specialized training include proper use of Miranda and Garrity warnings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA
- Does this specialized training include sexual abuse evidence collection in confinement settings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA
- Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA

115.34 (c)

- Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA

115.34 (d)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail PREA Training policy #317 outlines the requirement that all investigative staff receive specialized investigation training. Renville County has 2 trained investigators who have completed the National Institute of Corrections Training. The investigator interviewed has completed the National Institute of Corrections online training. The investigator interviewed has completed the National Institute of Corrections online training and a two-day PREA investigations training conducted by the Department of Corrections. Renville County has well-trained, experienced investigators. The investigator interviewed has 20 years of law enforcement experience and 8 years as an investigator who conducts investigations on all crimes. The investigator interviewed demonstrated knowledge of conducting criminal and administrative investigations of sexual abuse or assault in a confinement setting.
- B.** The specialized training includes all the topics listed in paragraph "b" of this standard.
- C.** Training documentation is maintained for all employees that have completed specialized investigative training in confinement settings.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA Training policy #317
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with licensed investigator
- Training documentation

Standard 115.35: Specialized training: Medical and mental health care

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

115.35 (a)

- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? ☒ Yes ☐ No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? ☒ Yes ☐ No

115.35 (b)

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

115.35 (c)

- Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere?
☒ Yes ☐ No

115.35 (d)

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

Auditor Overall Compliance Determination

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

- A.** The contracted medical provider MEnD Correctional Care provides PREA training and intervention training for the Medical Provider and Registered Nurse who work in the facility. An interview with a registered nurse confirmed receipt of training and understood her responsibilities for detecting, responding, and reporting sexual misconduct.
- B.** This paragraph is not applicable, forensic medical examinations are conducted at a community hospital.
- C.** The training is documented, and copies were provided.
- D.** MEnD Correctional Care employees receive full training outlined in paragraph "a" of this standard through MEnD Correctional Care during initial orientation and every other year thereafter. The Agency provides training to MEnD employees on its zero-tolerance policy and facility-related procedures.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA Training policy #317
- Completed Pre-Audit questionnaire submitted by the Agency
- MEnD Correctional Care PREA training and intervention policy

- Signed acknowledgments and certificates of training
- Interview with nursing staff

SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

Standard 115.41: Screening for risk of victimization and abusiveness

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

115.41 (a)

- Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? ☒ Yes ☐ No
- Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? ☒ Yes ☐ No

115.41 (b)

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

115.41 (c)

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

115.41 (d)

- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?
☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?
☒ Yes ☐ No

- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability? ☒ Yes ☐ No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes? ☒ Yes ☐ No

115.41 (e)

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

115.41 (f)

- Within a set time-period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening? ☒ Yes ☐ No

115.41 (g)

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

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

115.41 (h)

- Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section? ☒ Yes ☐ No

115.41 (I)

- Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail Inmate Classification policy #516 states the initial classification process is intended to identify predatory, violent, and at-risk inmates.
- B.** Policy #516 states a more in-depth classification will be conducted as soon as possible but no later than 24-hours after the inmate's arrival. Interviews with staff who perform risk screenings and randomly selected inmates appeared to indicate that a full screening for risk of sexual victimization and abusiveness was not being completed.
- C.** The Renville County Jail has a comprehensive assessment tool to determine if the inmate is a likely victim or predator. Since the last PREA audit the facility updated their classification questions by incorporating questions from the Adverse Childhood Experiences (ACES) questionnaire resulting in the loss of most of the PREA risk assessment tool.
- D.** The assessment tool Renville County used considers the criteria outlined in paragraph "d" of this standard.
- E.** The assessment tool does takes into consideration prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse as known to the agency.

- F.** The Renville County Jail Inmate Classification policy #516 requires an inmate be reviewed within 30 days from the inmate's arrival. The 30-day review will consider any new information obtained since the time of intake about possibilities for sexual victimization or abusiveness.
- G.** The Renville County Jail Inmate Classification policy #516 requires an inmate's risk level be reassessed when any new information that bears on the inmate's risk of sexual victimization or abusiveness.
- H.** The Renville County Jail Inmate Classification policy #516 prohibits staff from disciplining inmates for refusing to answer, or not disclosing complete information in response to questions (d)(1); (d)(7); (d)(8); or (d)(9) of paragraph "a" of this section.
- I.** The inmates risk screenings are securely stored; only command staff (Sergeant and above) have access to the screenings.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail Inmate Classification policy #516
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interviews with staff responsible for risk screening.
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interviews with randomly selected inmates

Corrective Action Required:

To meet this standard, the agency should start asking the questions listed on their Sexual Violence Prevention (PREA) Checklist.

Verification of Corrective Action Required

On May 11, 2020, the auditor was provided copies of completed risk screenings that ranged from November 2019 – April 2020. The copies represented completed risk screenings for male and female inmates.

Standard 115.42: Use of screening information

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

115.42 (a)

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

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

115.42 (b)

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

115.42 (c)

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

115.42 (d)

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

115.42 (e)

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

115.42 (f)

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

115.42 (g)

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

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail Inmate Classification policy #516 outlines the procedures to follow for classification of inmates for managing and separating inmates based on information gathered through the classification process to ensure appropriate housing and any necessary security or protective precaution to help protect inmates. Interviews with the PREA Coordinator and staff responsible for risk screening confirmed the safety and security of inmates, staff, and visitors is their highest priority.
- B.** The Renville County Jail Inmate Classification policy #516 outlines the agency's approach to making individualized determinations about how to ensure the safety of each inmate. The primary classification considers (age, sex, offense, the risk of escape, current physical conditions, safety risk, prior charge history, current behavior, and keep separates.)
- C.** The Renville County Jail Inmate Classification policy #516 considers housing and program assignments for transgender or intersex inmates on a case-by-case basis. The interview with the PREA Coordinator confirmed each placement of transgender or intersex inmates is determined on a case-by-case basis. The facility uses a transgender preference form.

- D.** Transgender and intersex inmates' classification and placement would be reassessed at least twice each year. Transgender and intersex inmates' classification and placement would be reassessed at least every 30-days.
- E.** The Renville County Jail Inmate Classification policy #516 states a transgender or intersex inmate's own view with respect to his or her own safety shall be given serious consideration.
- F.** All the showers in the facility are private
- G.** The Renville County Jail is not under a consent decree, legal settlement, or legal judgment to place lesbian, gay, bisexual, transgender, or intersex inmates in a dedicated unit.

There was a transgender inmate being housing at the facility during the on-site PREA Audit. The inmate stated the facility was very responsive and concerned about his/her safety. The inmate was housed in general population. At the inmate's request he/she was moved to an individual cell. The inmate stated staff ensured the inmate felt safe and comfortable with the housing decision.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail Inmate Classification policy #516
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interviews with staff responsible for risk screening
- Interview with a transgender inmate

Corrective Action Required:

To meet this standard, the agency should start using their Sexual Violence Prevention (PREA) Checklist.

Verification of Corrective Action Required:

On May 11, 2020, the auditor was provided copies of completed risk screenings that ranged from November 2019 – April 2020. The copies represented completed risk screenings for male and female inmates. The Sexual Violence Prevention (PREA) Checklist considers all topics in paragraph "a" of standard 115.41.

Standard 115.43: Protective Custody

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

115.43 (a)

- Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers? ☒ Yes ☐ No
- If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment? ☒ Yes ☐ No

115.43 (b)

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

115.43 (c)

- Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged? ☒ Yes ☐ No
- Does such an assignment not ordinarily exceed a period of 30 days? ☒ Yes ☐ No

115.43 (d)

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

115.43 (e)

- In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail PREA policy #612 prohibits placing inmates at high risk for sexual victimization in involuntary segregated housing solely on such identification. Inmates may be administratively segregated for less than 24 hours while an assessment is completed. The PREA Coordinator confirmed that protective custody inmates are not locked down and have the same opportunities as the general population units.
- B.** The PREA Coordinator confirmed that inmates have access to programs, privileges, education, and work opportunities and any restrictions would be documented. Minnesota Department of Corrections 2911.2800 rules for licensure requires a deprivation report about the item or activity that was restricted.
- C.** An inmate at high risk for sexual victimization will be placed in involuntary protective custody only until an alternative means of separation can be arranged, not ordinarily more than 30 days. Adherence to this policy was confirmed in the interview with the PREA Coordinator.
- D.** If an inmate is placed in involuntary protective custody, the Jail Administrator or designee will document the basis for any safety concerns and why no alternative means of separation can be arranged.
- E.** The Jail Administrator or designee reevaluates inmates classified as protective custody on a weekly basis as part of the classification process.

The facility reports that in the past 12 months, there have been zero inmates placed in involuntary protective custody for 1 to 24 hours awaiting completion of an assessment.
The facility reports that in the past 12 months, there have been zero inmates placed in involuntary protective custody for longer than 30 days waiting for alternative placement.

During the on-site PREA Audit, there were zero inmates at risk of sexual victimization or alleged to have suffered abuse being housed in involuntary protective custody.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

REPORTING

Standard 115.51: Inmate reporting

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

115.51 (a)

- Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment? ☒ Yes ☐ No
- Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents? ☒ Yes ☐ No

115.51 (b)

- Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? ☒ Yes ☐ No
- Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials? ☒ Yes ☐ No
- Does that private entity or office allow the inmate to remain anonymous upon request?
☒ Yes ☐ No
- Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? ☒ Yes ☐ No

115.51 (c)

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

115.51 (d)

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

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail provides inmates multiple internal ways to report sexual abuse and harassment, retaliation, and staff neglect. Inmates receive information about reporting during intake, inmate handbook, and through visible information posted in common areas of the jail. The reporting methods include request forms, verbally, anonymously, in writing, and third-party reporting. Interviews with randomly selected staff and inmates established staff know and understand their responsibility to report and inmates were informed of the options available to make a report of sexual misconduct.
- B.** The Renville County Jail has a signed Memorandum of Understanding with Safe Avenues in Willmar, Minnesota <https://www.willmarshelter.com/locations> to act as an outside third-party reporting agency for inmates. Contact information for these agencies are listed in the inmate handbook, and throughout the facility. These telephone numbers are programmed into the inmate telephone system as a free call. Interviews with randomly selected inmates verified knowledge of telephone numbers available if needed. The Renville County Jail provides Foreign Consuls phone numbers and addresses which is outlined in the inmate handbook.
- C.** The Renville County Jail policy 612 requires staff to accept reports of abuse or harassment made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports. Interviews with randomly selected staff verified knowledge and understanding of their responsibility to accept reports and would document verbal reports right away. Interviews with randomly selected inmates confirmed their knowledge of how to reports incidents of sexual misconduct. Inmates were asked if they thought the Agency would take their report of sexual abuse or harassment seriously; the inmates' response was "yes".
- D.** Staff may privately report sexual abuse and harassment of inmates to the Jail Administrator.

Interviews with randomly selected staff confirmed confidence that their administration takes all reports of sexual abuse and harassment seriously and all reports would be investigated.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interviews with randomly selected staff
- Interviews with randomly selected inmates
- Posters
- Inmate Handbook

Standard 115.52: Exhaustion of administrative remedies

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

115.52 (a)

- Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse. ☐ Yes ☒ No ☐ NA

115.52 (b)

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

115.52 (c)

- Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

115.52 (d)

- Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA
- At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

115.52 (e)

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

115.52 (f)

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

115.52 (g)

- If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

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

The Renville County Jail reports there have been zero grievances or emergency grievances filed alleging sexual abuse or sexual harassment in the past 12 months.

- A. The Renville County Jail has a formalized grievance process which is outlined in Inmate Grievances policy #620. An inmate handbook is provided to the inmates and outlines the grievance process procedure.
- B. The Renville County Jail Inmate Grievances policy #620 ensures that inmates are not required to attempt to informally resolve grievances related to sexual abuse. There is no time limit on when an inmate can submit a grievance for allegations of sexual abuse or sexual harassment.
- C. The Renville County Jail Inmate Grievances policy #620 ensures an inmate who alleges sexual abuse may be submitted to any staff member and need not be submitted to the member who is the subject of the complaint.
- D. A final agency decision will be issued within 90 days of the initial filing submitted by an inmate claiming sexual abuse or harassment. The Renville County Jail may utilize an extension of time to respond, up to 70 days, if the normal time-period for response is insufficient to make an appropriate decision. The inmate will be notified in writing of any such extension.
- E. The facility allows third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates to assist inmates in filing requests for administrative remedies for allegations of sexual abuse and harassment and file a request on behalf of the inmate. Inmate Grievances policy #620 states staff members who receive a grievance filed by a third party on behalf of an inmate shall inquire whether the inmate wishes to have the grievance processed and shall document the inmate's decision.
- F. Emergency grievances are permitted if an inmate is subject to a substantial risk of imminent sexual abuse. Upon receipt of an emergency grievance alleging imminent sexual abuse, the grievance will be immediately forwarded to a supervisor to determine whether immediate action is reasonably necessary. An initial response will be provided within 48 hours and an agency decision will be provided within 5 calendar days.

- G.** The agency policy states the jail may discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.

On the dates of the on-site audit, there were zero inmates who reported sexual abuse in custody.

Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail Inmate Grievances policy #620
- Completed Pre-Audit Questionnaire submitted by the Agency
- Inmate Handbook
- Official Inmate Grievance template
- Official Inmate Grievance Initial Review Response

Standard 115.53: Inmate access to outside confidential support services

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

115.53 (a)

- Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? ☒ Yes ☐ No
- Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? ☒ Yes ☐ No
- Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? ☒ Yes ☐ No

115.53 (b)

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

115.53 (c)

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

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail has entered into an ongoing Memorandum of Understanding (MOU) for collaborative services with Save Avenues located in Willmar, Minnesota <https://www.willmarshelter.com/locations>. Contact information for this service is provided in the inmate handbook and posted throughout the jail. Contact information for immigrant services agencies is posted in the inmate handbook. Calls to Safe Avenues and immigrant services agencies are free, private telephone calls.
- B.** There are posted telephone numbers in the inmate handbook that inmates can call free of charge using the inmate telephone system. Interviews with randomly selected inmates indicated knowledge of the free, private numbers or where they could find the numbers if needed.
- C.** The Renville County Jail maintains a copy of the MOU for collaborative services with Safe Avenues located in Willmar, Minnesota <https://www.willmarshelter.com/locations>

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Completed Pre-Audit Questionnaire submitted by the Agency
- Inmate Handbook
- MOU between Renville County and Safe Avenues
- Interviews with randomly selected inmates

Standard 115.54: Third-party reporting

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

115.54 (a)

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

Auditor Overall Compliance Determination

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

- The Renville County Jail has a method for receiving third-party reports of sexual abuse or harassment of inmates from third parties. Information on how to report is posted on the Agency's website https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/victim_information.php. Reporting options available are reporting directly to the Jail Administrator during business hours; contacting the jail and requesting to speak with a shift supervisor; or calling Safe Avenues.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Renville County Jail website:
https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/victim_information.php
- Inmate handbook and posted material

OFFICIAL RESPONSE FOLLOWING AN INMATE REPORT

Standard 115.61: Staff and agency reporting duties

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

115.61 (a)

- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency? ☒ Yes ☐ No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment? ☒ Yes ☐ No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? ☒ Yes ☐ No

115.61 (b)

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

115.61 (c)

- Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section? ☒ Yes ☐ No

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

115.61 (d)

- If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons' statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws? ☒ Yes ☐ No

115.61 (e)

- Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail PREA policy #612 outlines the procedures and expectation that any staff member who becomes aware of an incident of sexual abuse, harassment, or retaliation against staff or inmates shall immediately notify a supervisor. Interviews with randomly selected staff verified receipt of training and understood their responsibility to report. Staff reported they trusted their administration to take every allegation seriously and all allegations would be investigated.
- B.** Apart from reporting to those who have a legitimate need to know, the Renville County Jail PREA policy #612 prohibits staff from sharing any information related to the reported sexual abuse or harassment except to those who have a legitimate need to know. Interviews with randomly selected staff verified they would report any information to their immediate supervisor or a member of administration if their supervisor were not available.
- C.** Interview with medical staff confirmed their knowledge of their duty to report. Questions related to sexual abuse are asked when the initial medical screening is conducted. Prior to asking these questions, medical staff explains to the inmate their duty to report.
- D.** The Renville County Jail would report the allegation to the appropriate authorities if the alleged victim is under 18 or considered a vulnerable adult.
- E.** The Renville County Jail reports all allegations of sexual abuse and sexual harassment to the designated facility investigator. During his interview, the PREA Coordinator was clear that all allegations of sexual abuse and sexual assault would be investigated.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interviews with medical staff
- Interviews with randomly selected staff
- Inmate medical screening form
- Inmate follow-up referral form

Standard 115.62: Agency protection duties

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

115.62 (a)

- When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

The Renville County Jail reports that in the past 12 months, there have been zero instances where the facility determined an inmate was subject to a substantial risk of imminent sexual abuse. Interviews with the PREA Coordinator and randomly selected staff verified immediate action would be taken to protect the inmate.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interviews with randomly selected staff

Standard 115.63: Reporting to other confinement facilities

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

115.63 (a)

- Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred? ☒ Yes ☐ No

115.63 (b)

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

115.63 (c)

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

115.63 (d)

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

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail PREA policy #612 states If there is an allegation that an inmate was sexually abused while confined at another facility, the Jail Administrator shall notify the head of that facility as soon as possible but not later than 72 hours after receiving the allegation.
- B.** PREA Policy #612 states such notification be provided as soon as possible, but not later than 72 hours after receiving the allegation.
- C.** PREA policy #612 states the Jail Administrator shall ensure that the notification has been documented.
- D.** PREA policy #612 ensures that any allegations received from other facilities are investigated.

The Renville County Jail reports that there have been zero allegations of sexual abuse the facility received from another confinement facility.

The Renville County Jail reports that there have been zero allegation the facility has received that an inmate was abused while confined at another facility.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency

- Interview with Sheriff Scott Hable
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

Standard 115.64: Staff first responder duties

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

115.64 (a)

- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?
☒ Yes ☐ No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? ☒ Yes ☐ No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? ☒ Yes ☐ No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? ☒ Yes ☐ No

115.64 (b)

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

Auditor Overall Compliance Determination

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

The Renville County Jail reports in the past 12 months, there have been zero allegations that an inmate was sexually abused. In the past 12 months, there have been zero allegations where a staff member was notified within a time that still allowed for the collection of physical evidence.

A. The Renville County Jail PREA policy #612 details the duties of the first security staff member to respond.

A security staff first responder is required to:

- Separate the alleged victim and abuser;
- Preserve and protect the crime scene;
- If appropriate, request the alleged victim not destroy evidence (as detailed in this standard);
- If appropriate, ensure the alleged abuser not destroy evidence (as detailed in this standard)

B. If the first responder is not a corrections officer, policy #612 states the responder shall be required to request that the alleged victim not take any action that could destroy evidence (as detailed in this standard) and then immediately notify a corrections officer.

Interviews with randomly selected staff and non-security staff members showed they understood their duties as a first responder to the alleged victim and their duties as it relates to the alleged abuser.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interviews with randomly selected staff
- Interviews with medical staff

Standard 115.65: Coordinated response

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

115.65 (a)

- Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

The Renville County Jail has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse. The plan outlines responsibilities among staff first responders, medical practitioners, investigators, and facility leadership.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency

- Coordinated response plan
- Interview with Jail Administrator New Wohlman (PREA Coordinator)

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

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

115.66 (a)

- Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted? ☒ Yes ☐ No

115.66 (b)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

Renville County has entered into a new collective bargaining agreement since the last PREA audit. The Sheriff stated the new collective bargaining agreement maintains Agency Administration's right to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or a determination of whether and to what extent discipline will be imposed.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Collective Bargaining Agreement Review

Standard 115.67: Agency protection against retaliation

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

115.67 (a)

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

115.67 (b)

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

115.67 (c)

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes? ☒ Yes ☐ No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff? ☒ Yes ☐ No

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff? ☒ Yes ☐ No
- Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? ☒ Yes ☐ No

115.67 (d)

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

115.67 (e)

- If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?
☒ Yes ☐ No

115.67 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail reports that in the past 12 months, there has been zero incidents of retaliation reported, known, or suspected. The Renville County Jail PREA policy #612 states that all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations shall be protected from retaliation. The agency reports that the designated staff members charged with monitoring inmates and staff for retaliation would be the Jail Administrator/PREA Coordinator.
- B.** The Renville County Jail would use protective measures including housing changes, transfers, removal of alleged removal of alleged abusers from contact with victims, administrative reassignment or reassignment of the victim or alleged perpetrator to another housing area, and support services for inmates or staff who fear retaliation. Interviews with the Sheriff and PREA Coordinator verified that the Agency would take all reports or suspicions of retaliation seriously and immediate action would be taken. When asked during the random staff interviews staff was confident that Administration would not tolerate retaliation and would take immediate action.
- C.** PREA Policy #612 outlines the requirements for monitoring for retaliation (as detailed in this standard). Which was confirmed during an interview with the PREA Coordinator.

D. The PREA Coordinator explained the process that would be used for monitoring inmates for retaliation. Inmate reviews would be conducted weekly.

E. The Renville County Jail would take appropriate measures to protect an individual who cooperates with an investigation and expresses fear of retaliation.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

Standard 115.68: Post-allegation protective custody

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

115.68 (a)

- Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

F. The Renville County Jail PREA policy #612 prohibits placing inmates at high risk for sexual victimization in involuntary segregated housing solely on such identification. Inmates may be administratively segregated for less than 24 hours while an assessment is completed. The PREA Coordinator confirmed that protective custody inmates are not locked down and have the same opportunities as the general population units.

G. The PREA Coordinator confirmed that inmates have access to programs, privileges, education, and work opportunities and any restrictions would be documented. Minnesota Department of Corrections 2911.2800 rules for licensure requires a deprivation report about the item or activity that was restricted.

H. An inmate at high risk for sexual victimization will be placed in involuntary protective custody only until an alternative means of separation can be arranged, not ordinarily more than 30 days. Adherence to this policy was confirmed in the interview with the PREA Coordinator.

- I.** If an inmate is placed in involuntary protective custody, the Jail Administrator or designee will document the basis for any safety concerns and why no alternative means of separation can be arranged.
- J.** The Jail Administrator or designee reevaluates inmates classified as protective custody on a weekly basis as part of the classification process.

The facility reports that in the past 12 months, there have been zero inmates placed in involuntary protective custody for 1 to 24 hours awaiting completion of an assessment.

The facility reports that in the past 12 months, there have been zero inmates placed in involuntary protective custody for longer than 30 days waiting for alternative placement.

During the on-site PREA Audit, there were zero inmates at risk of sexual victimization or alleged to have suffered abuse being housed in involuntary protective custody.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

INVESTIGATIONS

Standard 115.71: Criminal and administrative agency investigations

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

115.71 (a)

- When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA
- Does the agency conduct such investigations for all allegations, including third party and anonymous reports? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).] ☒ Yes ☐ No ☐ NA

115.71 (b)

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

115.71 (c)

- Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data? ☒ Yes ☐ No

- Do investigators interview alleged victims, suspected perpetrators, and witnesses?
☒ Yes ☐ No
- Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator? ☒ Yes ☐ No

115.71 (d)

- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? ☒ Yes ☐ No

115.71 (e)

- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff? ☒ Yes ☐ No
- Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? ☒ Yes ☐ No

115.71 (f)

- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? ☒ Yes ☐ No
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? ☒ Yes ☐ No

115.71 (g)

- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? ☒ Yes ☐ No

115.71 (h)

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

115.71 (i)

- Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years? ☒ Yes ☐ No

115.71 (j)

- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?
☒ Yes ☐ No

115.71 (k)

- Auditor is not required to audit this provision.

115.71 (l)

- When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).) ☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

- ☐ **Exceeds Standard** (*Substantially exceeds requirement of standards*)
 - ☒ **Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
 - ☐ **Does Not Meet Standard** (*Requires Corrective Action*)
- A.** The Renville County Jail PREA policy #612 ensures investigations of sexual abuse and sexual harassment, including third-party and anonymous reports will be conducted promptly, thoroughly, and objectively.
- B.** Investigations are completed by investigators from the Renville County Sheriff's Office who have received specialized training pursuant to standard 115.34.
- C.** The licensed investigator interviewed was able to explain the investigative steps used which includes a collection of evidence, interviews, technology, and other pertinent information available.
- D.** The Renville County Sheriff's Office will consult with the Renville County Attorney's Office during investigations.
- E.** The credibility of the alleged victim, alleged perpetrator or witnesses is based on what the evidence supports as the investigation develops. Polygraphs would not be used in an investigation. Minnesota State Statute 611A.26. S.1 prohibits the use of polygraphs on victims of sexual abuse as part of or the condition for proceeding with the investigation, charging, or prosecution of such offense.
- F.** The Renville County Jail PREA policy #612 outlines the requirement of this paragraph in response to administrative investigations. The facility reported in the past 12 months, there was zero administrative investigations conducted. The administrative investigation includes descriptions of

any physical evidence and interviews, reasons for credibility assessments, investigative facts and findings, and an effort to determine whether staff actions or failures to act contributed to the abuse.

- G. Criminal investigations are documented and include interviews, evidence, a thorough description, and any additional information pertinent to the investigation.
- H. An investigation that supports criminal conduct will be forwarded by the Renville County Sheriff's Office to the Renville County Attorney's Office for prosecution.
- I. Renville County Jail PREA policy #612 requires the Office to retain all written reports from administrative and criminal investigations if the alleged abuser is held or employed by the Office, plus five years.
- J. The Sheriff and Jail Administrator/PREA Coordinator confirmed that an investigation would be completed even if the staff member were no longer employed with the Agency.
- L. The Renville County Sheriff's Office conducts their own sexual abuse investigations. The facility reported in the past 12 months, there was zero criminal investigations conducted.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Sheriff's Office Sexual Assault Investigation Policy
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interview with a licensed investigator

Standard 115.72: Evidentiary standard for administrative investigations

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

115.72 (a)

- Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

The Renville County Jail reports they do not impose a standard higher than a preponderance (more than fifty percent) of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with a licensed investigator

Standard 115.73: Reporting to inmates

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

115.73 (a)

- Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded? ☒ Yes ☐ No

115.73 (b)

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

115.73 (c)

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

115.73 (d)

- Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?
☒ Yes ☐ No
- Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?
☒ Yes ☐ No

115.73 (e)

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

115.73 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail PREA policy #612 states the Jail Administrator or authorized designee shall inform an inmate in writing whether an allegation whether the allegation has been substantiated, unsubstantiated or unfounded. The facility reports in the past 12 months, there has been zero criminal or administrative investigation of alleged inmate sexual abuse completed by the agency.
- B.** This paragraph is not applicable, criminal investigations are completed by trained Renville County Sheriff's Office licensed investigators.
- C.** PREA policy #612 outlines the information that would be provided to the inmate on the status of the accused staff member. (as detailed in this standard)
- D.** PREA policy #612 outlines the information that would be provided to an alleged victim on the status of the alleged abuser if another inmate is the accused. (as detailed in this standard)
- E.** PREA policy #612 states all notifications or attempted notifications shall be documented.

During the dates of the on-site audit, there were zero inmates in custody who reported sexual abuse.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Interview with licensed investigator

DISCIPLINE

Standard 115.76: Disciplinary sanctions for staff

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

115.76 (a)

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

115.76 (b)

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

115.76 (c)

- Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories? ☒ Yes ☐ No

115.76 (d)

- Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies (unless the activity was clearly not criminal)? ☒ Yes ☐ No
- Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

☐ **Does Not Meet Standard** (*Requires Corrective Action*)

- A.** The Renville County Jail reports that in the past 12 months, there has been zero staff members from the facility who has been disciplined, terminated, or resigned prior to termination for violating agency sexual abuse or sexual harassment policies. Additionally, in the past 12 months, there has been zero staff members reported to law enforcement or licensing boards for violating agency policies. The Renville County Jail PREA policy #612 outlines the disciplinary sanctions up to and including termination for violating sexual abuse and harassment policies.
- B.** Termination shall be the presumptive disciplinary sanction for staff who has engaged in sexual abuse. The Sheriff and PREA Coordinator confirmed a staff member would be terminated if he/she were involved in sexual abuse of inmates.
- C.** The Renville County Jail PREA policy #612 outlines the progressive discipline of staff members for violations of policies related to sexual abuse or harassment (other than engaging in sexual abuse).
- D.** All terminations or resignations for violating agency sexual abuse or harassment policies will be reported to law enforcement agencies unless the activity was clearly not criminal. The facility would be required to submit a special incident report to the Minnesota Department of Corrections.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

Standard 115.77: Corrective action for contractors and volunteers

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

115.77 (a)

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

115.77 (b)

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

Auditor Overall Compliance Determination

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

A. The Renville County Jail reports in the past 12 months, there has been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of inmates.

B. The Jail Administrator/PREA Coordinator was clear that any contractor or volunteer who engaged in sexual abuse of an inmate would not be tolerated and immediate actions would be taken. The Jail Administrator/PREA Coordinator stated he most likely would not allow a volunteer or contractor back into the jail after any violation of agency sexual abuse or sexual harassment policies. The policy does allow for appropriate remedial measures to be considered if a contractor or volunteer violates any other agency sexual abuse or sexual harassment policies.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

Standard 115.78: Disciplinary sanctions for inmates

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

115.78 (a)

- Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process? ☒ Yes ☐ No

115.78 (b)

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

115.78 (c)

- When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior? ☒ Yes ☐ No

115.78 (d)

- If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? ☐ Yes ☒ No

115.78 (e)

- Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? ☒ Yes ☐ No

115.78 (f)

- For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? ☒ Yes ☐ No

115.78 (g)

- Does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)
☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

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

A. The Renville County Jail has a formalized discipline plan applicable to inmates that is followed as outlined in policy and the inmate handbook. The discipline plan includes due process and a fair hearing conducted by an impartial person or panel of persons.

B. Disciplinary decisions are based on the nature and circumstances of the abuse committed, the inmate's discipline history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

C. The disciplinary process takes into consideration whether an inmates/detainee's mental disability or illness contributed to the inmate's/detainee's behavior.

D. The facility does not offer therapy, counseling, or other interventions to address and correct underlying reasons or motivations for offending inmates.

- E.** An inmate would not be disciplined for sexual contact with a staff member unless there is a finding that the staff member did not consent to the contact.
- F.** The Renville County Jail does not discipline inmates for a report of sexual abuse made in good faith based on a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.
- G.** The Renville County Jail prohibits all sexual activity between inmates and disciplines inmates for such activity and deems such activity as criminal sexual abuse only if it determines the activity was not coerced.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail Inmate Discipline policy #600
- Completed Pre-Audit Questionnaire submitted by the Agency
- Inmate Handbook
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

MEDICAL AND MENTAL CARE

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

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

115.81 (a)

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

115.81 (b)

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

115.81 (c)

- If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? ☒ Yes ☐ No

115.81 (d)

- Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?
☒ Yes ☐ No

115.81 (e)

- Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

C. The Renville County Jail reports that inmates who disclose any prior sexual victimization during the risk assessment are offered a follow-up meeting with medical or mental health. Medical staff interviewed report that inmates who are referred to a follow-up meeting with medical or mental health are seen within 14 days. On the dates of the onsite audit, there was zero inmates who had disclosed prior sexual victimization identified to interview.

D. Medical and mental health staff are limited from disclosing information related to sexual victimization that occurred in an institutional setting to other staff unless it is necessary to inform jail staff about security or management decisions. Medical staff interviewed said that they would notify the Jail Administrator or Assistant Jail Administrator

E. Questions related to sexual abuse are asked when the initial medical screening is conducted. Prior to asking these questions medical staff explain to the inmate their duty to report and would obtain informed consent if the prior victimization did not occur in a confinement setting.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail Inmate Discipline policy #600
- Completed Pre-Audit Questionnaire submitted by the Agency
- Initial medical screening form and follow-up screening form
- Interview with medical staff
- Interview with staff who perform risk screenings

Standard 115.82: Access to emergency medical and mental health services

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

115.82 (a)

- Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?
☒ Yes ☐ No

115.82 (b)

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

115.82 (c)

- Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate? ☒ Yes ☐ No

115.82 (d)

- Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?
☒ Yes ☐ No

Auditor Overall Compliance Determination

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

A. The Renville County Jail PREA policy #612 states inmates who are victims of sexual abuse shall be transported to the nearest appropriate location for treatment of injuries and crisis intervention services. The nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.

B. Policy requires staff take preliminary steps to protect the victim and immediately notify the appropriate qualified health care and mental health professionals.

C. Inmates would be offered information about timely access to emergency contraception and sexually transmitted prophylaxis from the SANE Nurse as deemed medically appropriate. Medical staff

interviewed would follow-up with the inmate to set up a treatment plan for continuing medical care after consulting with the facility's medical provider.

- D.** Policy states treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with medical staff
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

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

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

115.83 (a)

- Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility? ☒ Yes ☐ No

115.83 (b)

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

115.83 (c)

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

115.83 (d)

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

115.83 (e)

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

115.83 (f)

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

115.83 (g)

- Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? ☒ Yes ☐ No

115.83 (h)

- If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)
☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail contracts with MEnD Correctional Care to provide medical and mental health services in the facility. The services include a medical provider and RN nursing services.
- B.** Interviews with medical staff confirmed they would provide follow-up services and treatment plans as appropriate to the inmate. Information for continued care would be sent with an inmate transferring to another facility.
- C.** Community level of care is provided for all inmates. In some instances' treatment is at a higher level of care based on the immediate medical and/or mental health treatment available at the jail.
- D.** Medical staff verified pregnancy tests would be offered to inmates as medically appropriate.
- E.** The Renville County PREA policy #612 states if pregnancy results from the abuse, such victims shall receive comprehensive information about, and access to, all lawful pregnancy-related medical services in a timely manner.
- F.** Inmate victims of sexual abuse would be offered testing, treatment, and information for sexually transmitted infections. Medical staff interviewed verified the inmate would be offered testing, treatment, and information.

G. Policy states treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation.

H. Not applicable

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- MEnD Correctional Care Sexual Assault Nursing Protocol
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with medical staff

DATA COLLECTION AND REVIEW

Standard 115.86: Sexual abuse incident reviews

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

115.86 (a)

- Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded? ☒ Yes ☐ No

115.86 (b)

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

115.86 (c)

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

115.86 (d)

- Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse? ☒ Yes ☐ No
- Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility? ☒ Yes ☐ No
- Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse? ☒ Yes ☐ No
- Does the review team: Assess the adequacy of staffing levels in that area during different shifts? ☒ Yes ☐ No

- Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff? ☒ Yes ☐ No
- Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1) - (d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager? ☒ Yes ☐ No

115.86 (e)

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

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail reports that in the past 12 months, zero criminal or administrative investigation of alleged sexual abuse or assault were completed, and zero incident reviews were conducted. (excluding only "unfounded" incidents). PREA policy 612 states that an incident review shall be conducted at the conclusion of every sexual abuse investigation (unless the allegation is determined to be unfounded).
- B.** Policy states the review should ordinarily occur within 30 days of the conclusion of the investigation.
- C.** The Renville County incident review team consists of the Jail Administrator, Assistant Jail Administrator, investigators, Sergeants, medical and/or mental health providers and input from line staff.
- D.** Interviews with the PREA Coordinator verified there is a sexual abuse incident review on substantiated or unsubstantiated allegations of sexual abuse.
- E.** If the incident review team makes any recommendations, the facility will implement or document the reason for not implementing the recommendations.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre- Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)

Standard 115.87: Data collection

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

115.87 (a)

- Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions? ☒ Yes ☐ No

115.87 (b)

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

115.87 (c)

- Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice? ☒ Yes ☐ No

115.87 (d)

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

115.87 (e)

- Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.) ☒ Yes ☐ No ☐ NA

115.87 (f)

- Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.) ☐ Yes ☐ No ☒ NA

Auditor Overall Compliance Determination

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

The Renville County Jail collects accurate, uniform data for every allegation of sexual abuse and sexual harassment at the facility using a standardized instrument and set of definitions. The agency aggregates the data annually and prepares an annual report.

A&E. The Renville County Jail collects data for every allegation of sexual abuse and sexual harassment.

B. The Jail Administrator/PREA Coordinator reviews the data annually.

D. The Renville County Jail maintains, reviews, and collects data as needed from all available incident-based documents.

E. This paragraph is not applicable; Renville County does not contract with a private facility for the confinement of its inmates.

F. This paragraph is not applicable; the Department of Justice has not requested agency data.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Ned Wohlman Jail Administrator (PREA Coordinator)
- Incident based data collected by the Agency

Standard 115.88: Data review for corrective action

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

115.88 (a)

- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas? ☒ Yes ☐ No
- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis? ☒ Yes ☐ No
- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole? ☒ Yes ☐ No

115.88 (b)

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

115.88 (c)

- Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means? ☒ Yes ☐ No

115.88 (d)

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

Auditor Overall Compliance Determination

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

- A.** The Renville County Jail reviews data collected and uses the data for ongoing improvement and corrective action at the facility.
- B.** The Renville County Jail prepares an annual report that includes a comparison between the current year's data and the previous years' data in its efforts to continue to address sexual abuse and harassment.
- C.** The Annual Report is approved by the Sheriff and publicly distributed in the jail lobby
- D.** An explanation of the redacted material is provided

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Sheriff Scott Hable
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Review of Annual Report

Standard 115.89: Data storage, publication, and destruction

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

115.89 (a)

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

115.89 (b)

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

115.89 (c)

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

115.89 (d)

- Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

A. The Jail Administrator/PREA Coordinator maintains documentation collected from standard 115.87 on a secure database.

B. The Agency's sexual abuse data is publicly distributed on the agency's website:
<https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/PREA.php>

C. All personal identifiers are redacted before making the information public.

D. Policy dictates unless prohibited by Federal, State, or local law, sexual abuse data is maintained for a minimum of 10 years after the date of the initial collection.

Policy, Materials, Interviews, and Other Evidence Reviewed:

- Renville County Jail PREA policy #612
- Completed Pre-Audit Questionnaire submitted by the Agency
- Interview with Jail Administrator Ned Wohlman (PREA Coordinator)
- Renville County website: <https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/PREA.php>

AUDITING AND CORRECTIVE ACTION

Standard 115.401: Frequency and scope of audits

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

115.401 (a)

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

115.401 (b)

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

115.401 (h)

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

115.401 (i)

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

115.401 (m)

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

115.401 (n)

- Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? ☒ Yes ☐ No

Auditor Overall Compliance Determination

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

This is the Renville County Jail's second PREA Audit. On December 9, 2016, the Renville County Jail was found to be in full compliance with the Prison Rape Elimination Act (PREA) standards. The PREA Coordinator is experienced, knowledgeable and organized and supplied all the documents requested which made the PREA Audit flow smoothly. This auditor was given full access to the facility and was able to meet privately with staff and inmates without interference. PREA Audit posters in English and Spanish were posted 6 weeks prior to the audit and were hanging in all common areas throughout the facility with the auditor's name and address visible to inmates. Zero inmate correspondence was received during the PREA audit process

Standard 115.403: Audit contents and findings

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

115.403 (f)

- The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.) ☒ Yes ☐ No ☐ NA

Auditor Overall Compliance Determination

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

The Renville County Jail had the December 9, 2016 Final PREA Audit Report posted on its website. The contract agreement requires the facility to post a copy of the final PREA Audit Report within 90 days of receiving the report. <https://cms2.revize.com/revize/renvillemn/sheriff/divisions/jail/PREA.php>

AUDITOR CERTIFICATION

I certify that:

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

Auditor Instructions:

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

Darnel Carlson

05/15/2020

Auditor Signature

Date

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

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