

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



AGENCY INFORMATION (IF APPLICABLE)			
Name of facility:	Wright County Sheriff's Office		
Physical address:	3800 Braddock Avenue, NE Buffalo, MN 55313		
Date report submitted:	July 25, 2014		
Auditor Information			
Address:	Cathy Slack		
Email:	P.O. Box 278 Florence, CO 81226		
Telephone number:	719-784-4780		
Date of facility visit:	June 23-25, 2014 (Final)		
Facility Information			
Facility mailing address: (if different from above)			
Telephone number:	763-682-7653		
The facility is:	<input type="checkbox"/> Military	<input checked="" type="checkbox"/> County	<input checked="" type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input checked="" type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
Name of PREA Compliance Manager:	Tim Pippo	Title:	Assistant Jail Administrator
Email address:	Tim.pippo.co.wright.mn.us	Telephone number:	
Agency Information			
Name of agency:			
Governing authority or parent agency: (if applicable)	Wright County Government		
Physical address:	3800 Braddock Avenue, NE Buffalo, MN 5531		
Mailing address: (if different from above)			
Telephone number:	763-682-7662		
Agency Chief Executive Officer			
Name:	Joe Hagerty	Title:	Sheriff

Email address:	Joe.hagerty@co.wright.mm.us	Telephone number:	763-682-7616
Agency-Wide PREA Coordinator			
Name:	Tim Pippo	Title:	Assistant Jail Administrator
Email address:	Tim.pippo.co.wright.mn.us	Telephone number:	763-684-2380

AUDIT FINDINGS

NARRATIVE:

The audit of Wright County Sheriff’s Office (WCSO) was conducted on June 23-25, 2014 by Cathy Slack, Certified PREA auditor. At approximately 8:30 a.m. an entrance meeting was held with Wright County Sheriff’s Office staff. The following were in attendance, Sheriff Joe Hagerty, Captain Pat O’Malley and Lieutenant Tim Pippo. Since the roster of inmates had been sent by email, the names of the inmates to be interviewed was given to Lt. Pippo. Also, the list of random staff were selected before the tour.

The tour began at 9:00 a.m. where all the housing units including segregation, intake, reception, screening area, kitchen, laundry, medical and the programs area were toured. Following the tour, random staff interviews from the 1st and 2nd shift were conducted. The PREA Coordinator, PREA Manager, (Agency Head) were interviewed.

On the second day the 3rd shift staff and all the rest of the random interviews were conducted which totaled 11 random interviews. The Sheriff and a volunteer staff member were interviewed on the third day as well. Two contract staff were interviewed.

On third day approximately 12 inmates were interviewed. There was one LGBTI inmate interviewed. Two inmates were from segregation and 1 at risk for sexual victimization. There were no transgender and intersex inmates at Wright County Sheriff’s Office. Female detainees were interviewed as well.

There were zero (0) sexual abuse/sexual harassment allegations reported within the past 12 months. There were zero (0) allegations against a staff member for sexual abuse in the past 12 months. There were zero (0) administrative or criminal allegations in the past 12 months.

The exit briefing was held on Wednesday at approximately 3:30 p.m. with the following staff in attendance Sheriff Joe Hagerty, Captain Pat O’Malley and Lieutenant Tim Pippo.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Wright County Jail opened in April 2009. The County Jail houses pre-trial detainees and individuals with sentences up to one year. The Jail is a one level, 120,000 Square Foot structure with an initial capacity of 352 inmates, with core facilities to serve up to 600 beds. The Jail is organized along a central corridor with core support functions on one side and housing on the other, allowing these two very different functions to expand independently as needed. The core support area includes a drive-thru vehicle “sally-port”, intake center, medical clinic, food service and laundry, loading dock, exercise and education. Jail Administration, video visiting, and Master Control are located adjacent to provide clear points of public access. Provisions are made for a secure corridor connection to future courts. Jail housing “pods” are constructed with pre-cast concrete cells stacked on two levels around an open two-story dayroom, with clerestory windows introducing natural daylight.

Two distinct management styles are provided: large "direct supervision" pods for inmates deemed generally cooperative and non-violent, and smaller "indirect supervision" units for individuals needing more secure accommodations. All cells are served by a "rear chase" providing easy access by maintenance staff to plumbing and mechanical systems. Central heating and ventilating equipment is located on a third level penthouse above each housing complex.

The Wright County Sheriff's Office is the 3rd largest sheriff's office in Minnesota. WCSO provides law enforcement services to the unincorporated areas of the county and additionally contract police services with 13 cities. There are eleven divisions within the sheriff's office: Administration, Bailiff, Civil Process, Communications, Community Services, Corrections, Criminal Investigations, Patrol, Recreational Enforcement, Special Investigation's Unit (Narcotics), and Warrants / Transports.

Philosophy and Goals

Wright County Jail will provide for, in a cost effective manner, the confinement and well-being of persons lawfully detained or sentenced for violations of law. Safety for the citizens of Wright County, staff, and inmates will be our primary goal. A positive atmosphere will be created for both staff and inmates through training for Corrections Staff, incentives for inmates through a classification system based on behavior, and access to a variety of programs to help inmates grow in a positive direction to assist their re-entry into the Community. The Jail Staff are committed to the preservation of the individual constitutional rights as well as to provide for the basic needs of inmates housed in our Jail.

Wright Count Mission Statement:

The Wright County Sheriff's Office, in partnership with the community, is committed to improving our quality of life. We uphold the Constitutions of the United States and the State of Minnesota, and dedicate ourselves to maintaining order, protecting life and property, reducing the fear of crime, and ensuring a safe and secure correctional facility. We hold ourselves accountable to the guiding principles of integrity, professionalism, caring, and fairness.

Guiding Principles:

- **INTEGRITY**
We pride ourselves on upholding the highest ethical standards that guide us to serve in A trustworthy, truthful, and honorable manner.
- **PROFESSIONALISM**
We inspire trust and cooperation within the community and the Sheriff's Office. We are well-trained, highly motivated, progressive and innovative while providing responsive and quality service. -
- **CARING**
We are compassionate and respectful. We are approachable, understanding, and considerate of the needs of all people.
- **FAIRNESS**
We are equitable, just and consistent. We serve the community and each other in an unbiased and impartial manner.

Commitment To Service

Wright County's location just west of the Twin City metropolitan area has contributed to its rapid growth in recent years. The Sheriff's Office has continued to meet the challenge by providing quality, efficient, cost effective law enforcement services to the citizens of the county.

This division is responsible for the incarceration of Wright County prisoners for up to one year, as licensed by the Minnesota Department of Corrections. The present Wright County Jail was built in 2009 and has a licensed capacity of 224 inmates.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 1
Number of standards met: 41
Number of standards not met: 0
Non-applicable: 1

§115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Exceeds Standard (substantially exceeds requirement of standard)

XX 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) Zero-Tolerance: Policy 609 Prison Rape Elimination Act, section 609.2 PREA dated 5/9/14 addressed this standard.

PREA posters are available in English and available in all the housing units. Inmate Handbook addressed this standard.

- b) PREA Coordinator: Policy 100 Organizational Structure and Responsibility section 100.3.1 Chain of Command dated 5/9/14 addressed this standard. PREA Policy, section 609.3 PREA Coordinator dated 5/9/14 addressed this standard.

According to Wright County Sheriff's Office organizational chart the PREA Compliance Manager is under the supervision of the Jail Administrator.

§115.12 - Contracting with other entities for the confinement of inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

NA THIS STANDARD IS NON-APPLICABLE

This standard is NA as Wright County Sherriff's Office does not contract outside for inmate supervision. PREA Policy 609, section 609.3 (d) Prison Rape Elimination Act dated 5/9/14 addressed this standard.

§115.13 – Supervision and Monitoring

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609.4 Prison Rape Elimination Act dated 5/9/14 addressed this standard.

- a) Policy 102 Annual Review and Performance-Based Goals and Objectives section 102.3 (e) Annual Review dated 5/9/14 addressed this standard.

Policy 202 Supervision of Inmates dated 4/9/14 addressed this standard.

Policy 211 Daily Activity Logs and Shift Reports section 211.6.1 Post Checks dated 4/9/14 addressed this standard.

Policy 222 Staffing Plan, section 222.4.1 Data Collection for Analysis dated 6/27/14 addressed this standard.

Policy 502 Inmate Counts section 502.2 Approved Capacity dated 4/9/14 addressed this standard.

- b) WCSO has not varied from the staffing plan. Overtime is used to ensure staffing is met.
- c) Wright County Sherriff's Office has not varied from the staffing plan. Shifts are covered with mandatory or volunteer overtime.
- d) Video Monitoring: There are approximately 127 cameras which are located in hallways, dayrooms, specific cells and monitored by Master Control. Video retention is approximately 30 days. Four of these cameras were added in the last 12 months. These additional cameras covered the hallway in administration.
- e) Policy 609.3 PREA_COORDINATOR (I) Unannounced Rounds are addressed in this policy.

Staff do not schedule unannounced rounds and they are conducted randomly throughout the facility. Verified by staff interviews.

§115.14 – Youthful Inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 106.42 Minors in Custody dated 5/9/2004 addressed this standard. This Policy states the following:

"The Wright County Jail will detain persons 17 years of age and younger for a maximum of 6 hours or until alternative placement is determined. These detainees will be kept separate from sight and sound of adult detainees. The Wright County Jail may hold subjects 18 years of age or older for more than 6 hours.

Policy 507 Juvenile Detention 4/9/2014 addressed this standard.

507.2.1 states the following:

"Anytime a juvenile is brought into the secure area of the jail, regardless of whether they are booked, the Shift Supervisor will ensure that the Juvenile OJJDP Federal Compliance Spreadsheet is filled out and the Booking Officer will at least enter the juvenile in MNI with a note on what was done with the juvenile. Juveniles under the age of fourteen (14) may not be

held in the Wright County Jail. The Wright County Jail will not book, photograph, or fingerprint juveniles under the age of fourteen (14) unless ordered by the Court (Rule 5). Juveniles aged fourteen (14) through seventeen (17) maybe held in the Wright County Jail for up to six (6) hours if they have been charged with a delinquent criminal offense or a probation violation for a delinquent criminal adjudication. If continued secure detention is warranted, the juvenile is to be transferred to an approved juvenile detention facility.

(a) **EXCEPTION:** If there is no space available in an approved juvenile detention facility, or if other exigent circumstances prevent transfer to an approved juvenile facility, notify the Jail Administrator. The Jail Administrator will request a waiver from the Department of Corrections. Juveniles aged fourteen (17) maybe held in the Wright County Jail for up to six (6) hours if they have been charged with a delinquent criminal offense or a probation violation for a delinquent criminal adjudication. If continued secure detention is warranted, the juvenile is to be transferred to an approved juvenile detention facility.”

The Wright County Sheriff’s Office Policy does allow for placement of juveniles at the Wright County Sheriff’s Office. Due to policy and minimal time period, the youthful detainees are not housed for an extended period to utilize daily large muscle exercise or required special education services.

Youthful detainees are not housed with adult offenders. The youthful detainees are held in single cells in the Intake area until transferred from the Wright County Sheriff’s Office. A review of records for the past 12 months indicated there were 8 detainees under the age of 18 held at Intake area of the Jail and all youthful detainees were transferred to other agencies within two hours of their arrival. Although detainees are not normally kept longer than 6 hours, there is an exception, exigent circumstances may prevent transfer to an approved juvenile facility and a waiver may be requested from the Department of Corrections.

§115.15 – Limits to Cross-Gender Viewing and Searches

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 514 Searches dated 4/9/14 addressed this standard.

Policy 202 Supervision of Inmates-Minimum Requirements, section 202.5 Supervision of Inmates dated 4/9/2014 addressed this standard.

Standard Operating Procedures “Transgender – Intake” reference Policy (C516 Inmate Classification) addressed this standard. The Inmate Handbook addressed this standard.

Standard Operating Procedure “Officer Announcement into Housing Units” Reference Policy C204

1. Male Officers will announce “**Male in the block**” each time they enter a female housing unit.
2. Female Officers will announce “**Female in the block**” each time they enter a male housing unit.
3. Officers who are escorting maintenance, visitors, contractors, volunteers and or other persons into a housing unit will announce “ **Male or Female**” in opposite gender housing units for the persons they are escorting.

4. Announcements will only be required at the beginning of the shift during lock-down hours on (3rd shift).

There has been no cross gender strip or visual body cavity searches in the past 12 months.

During the tour of the Intake area, it was observed group holding cells have a bathroom which is visible to staff of the opposite gender. This has been addressed by Wright County Sheriff Office as they have glazed part of the windows that opposite gender staff cannot view when entering the intake area. Verified by photos sent by email on 7/2/14.

Verified by staff and inmate interviews.

§115.16 – Inmates with Disabilities and Inmates who are Limited English Proficient

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act section 609.6 First Responders dated 5/9/14 addressed this standard.

Policy 517 Staff and Inmate Communication dated 4/9/14 addressed this standard. Policy 517.3.1 Inmate Interpreters dated 5/9/14 addressed this standard.

Policy 603.7 Inmates with Disabilities dated 4/9/14 addressed this standard.

Policy 608 Inmate Rights-Protection from Abuse section 608.2 Policy dated 4/9/14 addressed this standard.

Policy 504 Inmate Orientation section 504.2.2 Orientation for Non-Readers, Visually-Impaired and Deaf or Hard of Hearing Inmates dated 5/9/14 addressed this standard. Inmates who cannot read, are visually impaired, or have intellectual, psychiatric or speech disabilities or limited reading skills, shall have the materials read to them by a staff member or to them using audible recorded media. Inmates who are deaf or hard of hearing shall be provided with interpretation services. Reasonable efforts should be made by the staff to assist the inmate in understanding the information (Minn.R. 2911.2700).

There are Language Line, Professional Language & American Sign Language Interpreters, IP Relay Services for the Deaf and Hard of Hearing and Video ASL Interpreter Services. Inmate/ Detainee handbook is English and Spanish and addressed this standard.

VRS and VRI services are available for inmates which includes the following services:

Video Remote Interpreting (VRI): Is a remote interpreting service used by staff to communicate with a deaf and hard of hearing (dhh) person. This service is available on the pre-booking computer. The jail pays an annual fee and per minute for this service. This service is available 24/7. **Video Relay Service (VRS):** Is used by deaf and hard of hearing (dhh) people to make a video calls to talk with both hearing and non-hearing people. This service is available on the pre-booking computer. This is a free service and is available 24/7.

IP Relay: Is an instant messaging type service. This service does not require a camera. This service is also available on the pre- booking computer. This is a free service and is available 24/7. These services are provided by the following:

Purple Communications www.purple.us

Purple technical support (24/7): 888-430-9656 premiersupport@purple.us

Account and General information: 800-618-2418 vri@purple.us

A written and signed acknowledgment of the orientation and receipt of the handbook should be maintained in the inmate's permanent file (Minn. R. 2911.5100, Subp. 3).

§115.17 – Hiring and Promotion Decisions

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 107 Promotion and Transfer, section 107.2.1 Disqualifications added the language to address this standard effective 6/27/2014.

Policy 304 Selection Process section 304.3 dated 4/9/14 addressed this standard.

Policy 310 Training Plan, section 310.4.1 Criminal Background Checks dated 4/9/2014 requires Criminal Background checks to be done on all new employees and then every 5 years on current employees. These checks are documented and the history maintained in the employee training file.

As of 6/27/2014, the below listed questions were added to the application process to include in the following documents: Civilians Correctional Officer Supplemental Questionnaire, the Background Questions and the Annual Personnel Review PREA Considerations.

Questions added:

a) Have you ever been engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility or other institution as defined in 42 USC 1997.

b) Have you ever been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion or if the victim did not consent or was unable to consent or refuse; or

c) Have you ever been civilly or administratively adjudicated to have engaged in the activity described in paragraph (b) of this section.

On 7/18/14 per email an example of an application was sent which is now being used by the Wright County Sheriff's Office. The applicant's name was redacted for review.

§115.18 – Upgrades to Facilities and Technology

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act, section 609.3 PREA Coordinator dated 5/9/14 addressed this standard. Policy 1000.2 dated 4/9/2017 addressed this standard.

There are approximately 127 cameras which are located in hallways, dayrooms, specific cells and monitored by Master Control. Video retention is approximately 30 days. Four of these cameras were added in the last 12 months. These additional cameras covered the hallway in administration.

This standard was verified by staff interviews.

§115.21 – Evidence Protocol and Forensic Medical Examinations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act, section 609.7 Sexual Abuse and Sexual Harassment Investigations and 609.10 Examination, Testing and Treatment dated 5/9/14 addressed this standard. Nursing Protocol on Sexual misconduct addressed this standard.

MeND Nursing Protocol on Sexual Assault dated December 2013 addressed this standard.

Wright County Jail has a Memorandum of Understanding dated 4/9/2014 with the Central Minnesota Sexual Assault Center 15 Riverside Drive, Northeast, St. Cloud, Minnesota 56304. Phone number is 320-251-4357 and website is www.cmsac.org. The MOU was signed 4/9/2014.

§115.22 – Policies to Ensure Referrals of Allegations for Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act, section 609.3 (f), 609.3 (j) and 609.7 Prison Rape Elimination Act section: Sexual Harassment Investigation dated 5/9/14 addressed this standard. dated /9/2014 addressed this standard.

There is a website for Wright County Jail that provides information to anyone regarding the reporting of sexual abuse or sexual harassment which is located on the following website <http://www.co.wright/mn.us/237/Jail>.

There were no allegations of sexual abuse or sexual harassment received in the past 12 months.

Based on interviews with staff.

§115.31 – Employee Training

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Action section 609.2 Zero Tolerance dated 5/9/2014 addressed this standard.

Policy 307 Training for PREA Reporting, section 307.1 Training for PREA Reporting and 307.2 Policy and 307.3 Member Training dated 5/9/14 addressed this standard.

The Wright County Sheriff's Office had PREA Training power points for staff and correctional officers. There are also signed acknowledgements from staff regarding Policy 2.18 Staff Fraternization with Offenders. Training rosters signed by staff who attended the PREA training were also reviewed. There are also quarterly refresher training on PREA and Daily Training Bulletins at Shift Briefings regarding Sexual Assault and Sexual Harassment.

Staff Interviews verified this standard.

§115.32– Volunteer and Contractor Training

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

There is a comprehensive volunteer handbook available for volunteers that include PREA information. PREA signed Acknowledgement forms are signed and training documented of volunteers and contractors.

Memorandum of understanding with Aramark dated 2/4/14 addressed this standard.

Memorandum of Understanding with MeND dated 2/11/14 addressed this standard.

Memorandum of Understanding with Midwest Protection dated 1/21/14 addressed this standard.

Reviewed volunteer and contract sign-in-sheets. Interviews with volunteer/contract staff verified this standard.

§115.33 – Inmate Education

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 504 .2.1 Inmate Orientation section 504.2.1 dated 5/9/14 addressed this standard. This standard is addressed in the Inmate/Detainee Handbook. Inmate/Detainee Handbook is in both English and Spanish. PREA poster (English only) and PREA Booking Notes regarding zero tolerance addressed this standard. Education is included in PREA screening information. There is no video, but observation on the intake process and through inmate and staff interviews this standard was addressed. This standard does not have policy regarding deaf, visually impaired, otherwise disabled. According to an email sent by Tim Pippo with the attached updated Policy 504 Inmate Orientation now has the following language and meets the standard.

“Inmates who cannot read, who are visually impaired, or who have intellectual, psychiatric or speech disabilities or limited reading skills shall have the materials read to them by a staff member or to them using audible recording material. ”

The new Standard Operating Procedure dated 6/26/ 2014 indicates the following:

Video Remote Interpreting (VRI): Is a remote interpreting service used by staff to communicate with a deaf and hard of hearing (dhh) person. This service is available on the pre-booking computer. The jail pays an annual fee and per minute for this service. This service is available 24/7.

Video Relay Service (VRS): Is used by deaf and hard of hearing (dhh) people to make a video calls to talk with both hearing and non-hearing people. This service is available on the pre-booking computer. This is a free service and is available 24/7.

IP Relay: Is an instant messaging type service. This service does not require a camera. This service is also available on the pre- booking computer. This is a free service and is available 24/7.

These services are provided by *Purple Communications* www.purple.us
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Account and General information: 800-618-2418 vri@purple.us

§115.34 – Specialized Training: Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 307 Training for PREA Reporting, section 307.5 Specialized Investigations dated 5/19/14 addressed this standard.

Specialized Investigative Training Certificate of Lt. Tim Pippo dated 5/28/14 addressed this standard. PREA Training On-Line ACA Investigative Course entitled PREA: Investigation Protocols documented on file.

§115.35 – Specialized training: Medical and mental health care

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 307 Training for PREA Reporting, section 307.4 Specialized Medical Training dated 5/9/2014 addressed this standard.

MEnD Policy 202.057 Nursing Protocol PREA Training dated December 2013 addressed this standard.

MEnD 202.057 Nursing Protocol on Sexual Assault dated December 2013 addressed this standard.

Memorandum of Understanding with Central Minnesota Mental Health Center dated 5/14/14 addressed.

There is a contract with the Central Minnesota Mental Health Center from 2/1/14 to 12/31/14. Training Certificates from Medical and Mental Health are documented and training acknowledgment are signed.

§115.41 – Screening for Risk of Victimization and Abusiveness

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 207 Data Practices and release of Information section 207.2 Access to Criminal Records dated 5/9/14 addressed this standard and 207.3 Staff Training dated 5/9/14 addressed this standard.

Policy 515 Inmate Classification section 515.3 Classification Plan dated 4/5/09 addressed this standard.

Policy C516 Classification Procedure dated 3/8/13 addressed this standard.

Screening instrument meets all components of standard. All inmates were reassessed for risk of sexual victimization within 30 days of arrival. PREA screening instruments contains this information. It was discussed with the Sheriff, Jail Administrator and PREA Coordinator that inmates do not have privacy in the booking area when going through the intake process. The PREA signed acknowledgments were reviewed.

§115.42 – Use of Screening Information

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 515 Inmate Classification: section 515.3 Classification Plan, 515.6.1 Periodic Classification Reviews, 515.13 Staff Training in Classification dated 5/9/14 addressed this standard.

Standard Operating Procedures for Classification dated 3/18/13 addressed this standard.

- a) The risk screening instrument is used to assess sexually victimized from those at high risk of being sexually abusive.
- b) Determinations are made on a case by case basis.
- c) In deciding to place transgender or intersex inmates, decisions are made on a case- by case basis.
- d) There are currently no transgender or intersex inmates at the Wright County Jail.
- e) Inmates own views are given consideration when being interviewed.

§115.43 – Protective Custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act dated 5/9/14 addressed this standard. Policy 609.11 Protective Custody dated 5/9/14 addressed this standard. Policy 515.10 Inmate Classification dated 5/9/14 addressed this standard.

There have not been any incident where an inmate with a high risk of sexual victimization was housed involuntarily in segregation/protective custody.

§115.51 – Inmate Reporting

XX Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 504 Inmate Orientation, section 504.2.1 Initial Orientation addressed this standard.

Policy 517 Staff and Inmate Communication, section 517.2 Policy, section 517.3 General Conduct Guidelines dated 5/9/14 addressed this standard.

Standard Section (a) Multiple Internal Ways for inmates to privately report are: Policy 904 Reporting Sexual Abuse and Sexual Harassment dated 5/28/14 addressed this standard. The policy states the following:

"Prisoners may make reports verbally, in writing, privately or anonymously of any of the following (28 CFR 115.151):

- Sexual abuse
- Sexual harassment
- Retaliation by other prisoners or staff for reporting sexual abuse or sexual harassment
- Staff neglect or violation of responsibilities that may have contributed to sexual abuse or sexual harassment

During intake the Office shall notify all prisoners of the zero-tolerance policy regarding sexual abuse and sexual harassment, and of at least one way to report abuse or harassment to a public or private entity that is not part of the Office and that is able to receive and immediately forward prisoner reports of sexual abuse and sexual harassment to agency officials. This allows the prisoner to remain anonymous (28 CFR 115.132; 28 CFR 115.151)."

- Any inmate may report to a staff member at the Wright County Sheriff's Office.
- Inmates may report sexual abuse or sexual harassment incidents anonymously or to any staff member they choose.
- Inmates may report in writing through the "Turnkey" kiosk, anonymously.
- There is information in the Inmate Handbook on reporting sexual abuse or sexual harassment.
- Inmates can use an inmate request form which goes to a housing office or a specific staff member if requested.

Standard Section (b) Inmates can report Sexual Abuse/Harassment to a public or private entity:

- Inmates can report it directly to the Central Sexual Assault Center at 1-800-237-5090 or 320-251-4357.
- Inmates may report to their Consular through a Consular notifications report form which are provided to inmates in regards to contact their specific consulate.

Standard Section (c): Staff shall accept reports made verbally in writing, anonymously, and from third parties and shall promptly document any verbal reports.

- Policy 904 Reporting Sexual Abuse and Sexual Harassment dated 5/28/14 addressed this standard. The policy states the following: "Prisoners may make reports verbally, in writing, privately or anonymously of any of the following(28 CFR 115.151):

Standard Section (d): The agency shall provide a method for staff to privately report sexual abuse and sexual harassment.

- Third party reporting can be submitted to the Wright County Sheriff's Office by phone at 1-800-362-3667.
- Staff can report to a supervisor or the PREA Compliance Manager, notify Jail Administrator or Investigator

This standard was verified by staff and inmates.

§115.52 – Exhaustion of Administrative Remedies

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

There have been no grievances of Sexual Abuse in the past 12 months. There have been no emergency grievances alleging a substantial risk of imminent sexual abuse filed in the past 12 months.

§115.53 – Inmate Access to Outside Confidential Support Services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609.4 Prison Rape Elimination Act dated 5/9/14 addressed this standard.

Interviews indicated the Victim Advocacy information is on "Turnkey using the Canteen Card where the PREA message pops ups and also information is provided in the Inmate Handbook. The Victim Advocacy Group is Central Minnesota Sexual Assault Center and the phone number is 1-800-337-5090 and (320-251-4357). The PREA auditor contacted them to verify the support and assistance they provide to inmates at the Wright County Sheriff's Office.

§115.54 – Third-Party Reporting

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609.3, 609.4 Prison Rape Elimination Act section Reporting Sexual Abuse, Harassment and Retaliation dated 5/9/14 addressed this standard.

- Third party reporting can be found on the website: www.cowright.mn.us/departmentsheriff/corrections.asp
- Third party reporting can be submitted to the Wright County Sheriff's Office by phone at 1-800-362-3667.
- Inmates can report it directly to the Central Sexual Assault Center at 1-800-237-5090 or 320-251-4357.
- Inmates may report to their Consular through a Consular notifications report form which are provided to inmates in regards to contact their specific consulate.
- Inmates can report to an attorney, friend or family member in writing or by phone.

This standard was verified by staff and inmate interviews.

§115.61 – Staff and Agency Reporting Duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act, Section 609.4 Reporting Sexual Abuse, Harassment and Retaliation and section 609.7 Sexual Abuse and Sexual Harassment Investigation dated 5/9/14 addressed this standard.

Staff are obligated to report immediately to a supervisor or the Jail Administrator any incident of sexual abuse or sexual harassment. Training bulletins were reviewed regarding this standard.

This standard was verified by staff Interviews.

§115.62 – Agency Protection Duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 506 Administrative Segregation and Special Management Inmates section 506.4 Circumstances Required Immediate Segregation dated 5/9/14 addressed this standard.

Daily Bulletin training addressed this standard.

Per interview with the PREA Compliance Manager there were no substantial incidents of sexual abuse or harassment in the past 12 months.

§115.63 – Reporting to Other Confinement Facilities

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act section 609.4 Reporting Sexual Abuse/Harassment and Retaliation and 609.4.1 reporting to Other Facilities dated 5/9/14 addressed this standard.

There were no allegations that an inmate was sexually abused while confined at another facility during the past 12 months.

§115.64 – Staff First Responder Duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act section 609.6 First Responders dated 5/9/14 addressed this standard.

MEnD Nursing Protocol on Sexual Assault 202.057 dated December 2013 addressed this standard.

Standard Operating Procedures Wright County Jail Sexual Assault / Abuse Response Reference Policy C400, C608 and C609 addressed the institutional plan.

Daily Training Bulletins regarding sexual abuse are provided at shift briefings. To date there have not been any PREA incidents of sexual abuse in the past 12 months.

This standard is verified by staff interviews.

§115.65 – Coordinated Response

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

MEnD Nursing Protocol on Sexual Assault 202.057 dated December 2013 addressed this standard.

Standard Operating Procedures Wright County Jail Sexual Assault/Abuse Response Reference Policy C400, C608 and C609 addressed the institutional plan.

This standard is verified by staff interviews.

§115.66 – Preservation of ability to protect inmates from contact with abusers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

There has been no collective bargaining agreement entered into or renewed in the past 12 months.

§115.67 – Agency protection against retaliation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act: section 609.5 Retaliation and 609.5.1 Reports by Inmates dated 5/9/14 addressed this standard.

Policy 110 Discriminatory Harassment, section 110.4 Responsibilities dated 5/9/14 addressed this standard.

There have been no incidents of retaliation regarding sexual harassment or sexual abuse in the past 12 months.

§115.68 – Post-Allegation Protective Custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 506 Administrative Segregation and Special Management Inmates section 506.5 Protective Custody dated 5/9/14 addressed this standard and section 506.6 Maintenance and Privileges dated 5/9/14 addressed this standard.

To date there has not been any incident where an inmate is housed in involuntary segregation following an allegation of sexual abuse.

This standard was verified by staff and inmate interviews.

§115.71 – Criminal and Administrative Agency Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609.7 and 609.14 Prison Rape Elimination Act dated 5/9/14 addressed this standard.

There were no substantiated allegations of sexual abuse conduct that appeared to be criminal.

§115.72 – Evidentiary Standard for Administrative Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609.7.1 and 609.14 Prison Rape Elimination Act dated 5/9/14 addressed this standard.

This standard was verified by staff interviews.

§115.73 – Reporting to Inmate

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609.7.2 Prison Rape Elimination Act dated 5/9/14 addressed this standard.

There were no criminal and/or administrative investigations of alleged sexual abuse in the past 12 months.

§115.76 – Disciplinary sanctions for staff

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609.7.1 Prison Rape Elimination Act section Investigative Findings dated 5/9/14 addressed this standard.

Wright County Personnel Policy 704 Discipline adopted 1/1/06 addressed this standard.

No staff at Wright County Sheriff's Office have violated agency sexual abuse or sexual harassment policies.

§115.77 – Corrective action for contractors and volunteers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy PREA section 609.8 PREA section Sexual Harassment and 609.8.1 Prison Rape Elimination Act section Sexual Abuse by Contract or Volunteer dated 5/9/14 addressed this standard.

Wright County Personnel Policy 703 Harassment/Offensive and Violent Behavior dated 11/16/04 addressed this standard.

There have been no contractors/volunteers reported to law enforcement agencies for engaging in sexual abuse of inmates. Verified by staff interviews.

§115.78 – Disciplinary sanctions for inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 600 Inmate Discipline and Due Process section 600.10 Limitation on Disciplinary Actions dated 5/9/14 addressed this standard.

There have been no administrative or criminal findings of inmate-on-inmate sexual abuse in the past 12 months.

§115.81 – Medical and mental health screenings; history of sexual abuse

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 515 Inmate Classification section 515.9 Inmate Classification dated 5/9/14 addressed this standard.

Policy 609 Prison Rape Elimination Act dated 5/9/14 addressed this standard.

Policy 704 Mental Health and High Risk Inmates dated 5/9/14 addressed this standard.

Policy 703 Initial medical Screening and Health Appraisal dated 5/9/14 addressed this standard.

By email of 7/21/14 a screening example of a female inmate's medical chart, health assessment and meeting with mental health was reviewed and documented within the 14 day time frame of arrival.

§115.82 – Access to emergency medical and mental health services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act, section 609.6 First Responders, section, 609.9 Sexual Abuse Victims and 609.10 Examination, Testing and Treatment dated 5/9/14 addressed this standard.

This standard was verified by staff and inmate interviews.

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act section 609.10 Examination, Testing and Treatment dated 5/9/14 addressed this standard.

Policy 704.5 Mental Health and High Risk Inmate⁴, section 704.5 Mental Health Referral dated 5/9/14 addressed this standard.

This standard was verified by staff interviews.

§115.86 – Sexual abuse incident reviews

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609.12 Prison Rape Elimination Act section 609.12 Sexual Abuse Incident Reviews dated 5/9/14 addressed this standard.

Standard Operating Procedure C609 Contains definitions of Sexual Abuse and Sexual Harassment.

PREA Coordinator will track incident log.

No criminal or administrative investigations of alleged sexual abuse in the past 12 months. Website for Wright County Sheriff is <http://www.co.wright/mn.us/237/jail>

This standard is verified by staff interviews.

§115.87 – Data Collection

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act, section 609.14 Records dated 5/9/14 addressed this standard.

MN Rule 2911 addressed this standard.

Website for Wright County Sheriff is <http://www.co.wright/mn.us/237/jail>

§115.88 – Data Review for Corrective Action

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act section 609.13 Data Review dated 5/9/14 addressed this standard.

Policy 102 Annual Review and Performance Based Goals and Objectives section 102.3 Annual Review dated 5/9/14 addressed this standard.

During the audit, the Annual Report was discussed at exit briefing and the standard requiring it be published on a public website. An email was sent from the PREA Compliance Manager on June 27, 2014 indicating the location of the newly addressed public website. The annual report can now be found on the following website: <http://www.co.wright/mn.us/237/Jail>.

§§115.89 – Data Storage, Publication, and Destruction

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Policy 609 Prison Rape Elimination Act, Section 609.13 Data Reviews and 609.14 Records dated 5/9/14 addressed this standard.

Policy 208 Inmate Records, section 208.2.3 Electronic Records and 208.2.4 Record Retention dated 5/9/14 addressed this standard.

During the audit, the Annual Report was discussed at exit briefing and the standard requiring it be published on a public website. An email was sent from the PREA Compliance Manager on June 27, 2014 indicating the location of the public website. The annual report can now be found on <http://www.co.wright/mn.us/237/Jail>.