

# PREA Facility Audit Report: Final

**Name of Facility:** Lakewood Sheriff's Station

**Facility Type:** Lockups

**Date Interim Report Submitted:** 10/14/2022

**Date Final Report Submitted:** 05/11/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Catharine Wright	<b>Date of Signature:</b> 05/11/ 2023

AUDITOR INFORMATION	
<b>Auditor name:</b>	Wright, Catharine
<b>Email:</b>	cwright@oig.lacounty.gov
<b>Start Date of On-Site Audit:</b>	08/24/2022
<b>End Date of On-Site Audit:</b>	08/30/2022

FACILITY INFORMATION	
<b>Facility name:</b>	Lakewood Sheriff's Station
<b>Facility physical address:</b>	5130 Clark Avenue, Lakewood, California - 90712
<b>Facility mailing address:</b>	

<b>Primary Contact</b>	
<b>Name:</b>	John Barkley
<b>Email Address:</b>	jgbarkle@lasd.org
<b>Telephone Number:</b>	3235265314

<b>Sheriff/Chief/Director</b>	
<b>Name:</b>	Captain Dan Holguin
<b>Email Address:</b>	dholguin@lasd.org
<b>Telephone Number:</b>	5626233600

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	32
<b>Current population of facility:</b>	25
<b>Average daily population for the past 12 months:</b>	25
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	0 to 99
<b>Facility security levels/detainee custody levels:</b>	all levels of security
<b>Does the facility hold juveniles or youthful detainees?</b>	Yes

<b>Number of staff currently employed at the facility who may have contact with detainees:</b>	9
<b>Number of individual contractors who have contact with detainees, currently authorized to enter the facility:</b>	2
<b>Number of volunteers who have contact with detainees, currently authorized to enter the facility:</b>	28

<b>AGENCY INFORMATION</b>	
<b>Name of agency:</b>	Los Angeles County Sheriff's Department
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	4700 Ramona Boulevard, Los Angeles, California - 91754
<b>Mailing Address:</b>	450 Bauchet Street, Suite E826, Los Angeles, California - 90012
<b>Telephone number:</b>	3235265314

<b>Agency Chief Executive Officer Information:</b>	
<b>Name:</b>	Brendan J. Corbett, Assistant Sheriff
<b>Email Address:</b>	bjcorbet@lasd.org
<b>Telephone Number:</b>	2138935001

<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	John Barkley	<b>Email Address:</b>	jgbarkle@lasd.org

<b>Facility AUDIT FINDINGS</b>
<b>Summary of Audit Findings</b>
The OAS automatically populates the number and list of Standards exceeded, the number of

Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

**Number of standards exceeded:**

0

**Number of standards met:**

8

**Number of standards not met:**

27

- 115.111 - Zero tolerance of sexual abuse and sexual harassment
- 115.113 - Supervision and monitoring
- 115.115 - Limits to cross-gender viewing and searches
- 115.116 - Detainees with disabilities and detainees who are limited English proficient
- 115.118 - Upgrades to facilities and technologies
- 115.121 - Evidence protocol and forensic medical examinations
- 115.122 - Policies to ensure referrals of allegations for investigations
- 115.131 - Employee and volunteer training
- 115.132 - Detainee, contractor, and inmate worker notification of the agency's zero-tolerance policy
- 115.134 - Specialized training: Investigations
- 115.141 - Screening for risk of

victimization and abusiveness

- 115.151 - Detainee reporting
- 115.161 - Staff and agency reporting duties
- 115.162 - Agency protection duties
- 115.163 - Reporting to other confinement facilities
- 115.164 - Staff first responder duties
- 115.165 - Coordinated response
- 115.167 - Agency protection against retaliation
- 115.171 - Criminal and administrative agency investigations
- 115.172 - Evidentiary standard for administrative investigations
- 115.176 - Disciplinary sanctions for staff
- 115.177 - Corrective action for contractors and volunteers
- 115.186 - Sexual abuse incident reviews
- 115.187 - Data collection
- 115.188 - Data review for corrective action
- 115.189 - Data storage, publication, and destruction
- 115.401 - Frequency and scope of audits

## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-08-24
2. End date of the onsite portion of the audit:	2022-08-30

#### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	The audit team contacted the American Civil Liberties Union of Southern California, Peace Over Violence, Dignity and Power Now, Just Detention International, Loved Ones Victim Services, Strength United, The Rape Treatment Center, Young Women's Christian Association (YWCA), and the East Los Angeles Women's Center.

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	32
15. Average daily population for the past 12 months:	25
16. Number of inmate/resident/detainee housing units:	8
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

**Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit**

**Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit**

<b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	15
<b>37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	2
<b>40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	0

<b>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b>	0



<p><b>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>Lakewood Station utilizes multiple screening instruments to collect population characteristics, including the 9-Line Booking Form, Station Jail Inmate Classification Questionnaire, and the Los Angeles County Unified Arrestee Medical Screening Form.</p> <p>Each of the screening instruments gather pertinent information about the detainee, such as, whether the detainee has a mental, physical, or developmental disability, the age of the detainee, whether the detainee is a member of the LGBT community, whether the detainee cannot be housed with others, and the detainee's own perception of their vulnerability. The station jail screening instruments do not ask detainees if they have reported sexual abuse or disclosed prior sexual victimization during risk screening. However, this information is not required to be collected, per the PREA lockup standards. The audit team reviewed booking packets of detainees who were housed at the facility on the first day of the audit. Although most population characteristic information is collected during the screening process, LASD Station jails do not track the information. As such, the audit team relied on interviews with staff and detainees, reviewed booking packets, and toured the housing locations to determine if any detainees fell within targeted populations.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>271</p>
<p><b>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>27</p>

<p><b>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>4</p>
<p><b>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>Lakewood Station self-reported population characteristics for staff, volunteers and contractors employed at the facility on day one of the onsite portion of the audit. The audit team questions the accuracy of the provided data. Upon reviewing the staff roster during the onsite audit, the audit team identified staff on the list who were retired, transferred to different work locations or on medical leave.</p>
<p><b>INTERVIEWS</b></p>	
<p><b>Inmate/Resident/Detainee Interviews</b></p>	
<p><b>Random Inmate/Resident/Detainee Interviews</b></p>	
<p><b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>7</p>
<p><b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p> <input checked="" type="checkbox"/> Age  <input checked="" type="checkbox"/> Race  <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)  <input type="checkbox"/> Length of time in the facility  <input checked="" type="checkbox"/> Housing assignment  <input checked="" type="checkbox"/> Gender  <input type="checkbox"/> Other  <input type="checkbox"/> None </p>
<p><b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>Due to the small size of the detainee population at Lakewood Station, the audit team interviewed all detainees who agreed to be interviewed during the onsite audit.</p>

<b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	4
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:</b>	0
<b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/detainees in this category:</b>	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/detainees.  <input type="checkbox"/> The inmates/detainees in this targeted category declined to be interviewed.

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/detainees).</b></p>	<p>The audit team determined that there were no youthful detainees at the facility at the time of the onsite audit. The determination was made by reviewing booking packets, informal conversations with staff and detainees, interviews with screening staff and inspecting the location where youthful detainees are held.</p>
<p><b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The audit team did not identify any disabled detainees at the facility at the time of the onsite audit. The determination was made by reviewing medical screening documents in the booking packets, informal conversations with detainees, interviews with screening staff and observations made while touring detainee housing units.</p>
<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>2</p>

<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The audit team did not identify any blind or low vision detainees at the facility during the onsite audit. The determination was made by reviewing medical screening documents located in the booking packets, informal conversations with detainees and staff, interviews with screening staff and observations made while touring detainee housing units.</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The audit team did not identify any deaf or hard-of-hearing detainees at the facility during the onsite audit. The determination was made by reviewing medical screening documents located in the booking packets, informal conversations with detainees and staff, interviews with screening staff and observations made while touring detainee housing units.</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>1</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The audit team did not identify any transgender or intersex detainees at the facility during the onsite audit. The determination was made by reviewing screening documents located in the booking packets, informal conversations with staff and detainees, interviews with screening staff and observations made while touring detainee housing units.</p>
<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Per the Auditor Handbook, this is not a targeted population for a lockup.</p>
<p><b>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Per the Auditor Handbook, this is not a targeted population for a lockup.</p>
<p><b>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Per the Auditor Handbook, this is not a targeted population for a lockup.</p>



<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>Due to the small size of the detainee population at Lakewood Station, the audit team interviewed all detainees who agreed to be interviewed during the onsite audit.</p>
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**Staff, Volunteer, and Contractor Interviews**

**Random Staff Interviews**

<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>12</p>
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<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
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<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p><b>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>No text provided.</p>
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**Specialized Staff, Volunteers, and Contractor Interviews**

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>41</p>
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<b>76. Were you able to interview the Agency Head?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>78. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>79. Were you able to interview the PREA Compliance Manager?</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

**80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)**

- Agency contract administrator
- Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- Line staff who supervise youthful inmates (if applicable)
- Education and program staff who work with youthful inmates (if applicable)
- Medical staff
- Mental health staff
- Non-medical staff involved in cross-gender strip or visual searches
- Administrative (human resources) staff
- Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- Investigative staff responsible for conducting administrative investigations
- Investigative staff responsible for conducting criminal investigations
- Staff who perform screening for risk of victimization and abusiveness
- Staff who supervise inmates in segregated housing/residents in isolation
- Staff on the sexual abuse incident review team
- Designated staff member charged with monitoring retaliation
- First responders, both security and non-security staff
- Intake staff

	<input type="checkbox"/> Other
<b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of VOLUNTEERS who were interviewed:</b>	4
<b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input type="checkbox"/> Religious <input checked="" type="checkbox"/> Other
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	2
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input checked="" type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

<b>84. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Was the site review an active, inquiring process that included the following:</b>	
<b>85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>88. Informal conversations with staff during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>No text provided.</p>
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**Documentation Sampling**

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

<p><b>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p><b>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>No text provided.</p>
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**SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY**

**Sexual Abuse and Sexual Harassment Allegations and Investigations Overview**

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

**92. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:**

	<b># of sexual abuse allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual abuse</b>	1	1	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0
<b>Total</b>	1	1	0	0

**93. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:**

	<b># of sexual harassment allegations</b>	<b># of criminal investigations</b>	<b># of administrative investigations</b>	<b># of allegations that had both criminal and administrative investigations</b>
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	0	0	0	0

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

#### 94. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual abuse</b>	0	1	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0	0
<b>Total</b>	0	1	0	0	0

#### 95. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0
<b>Total</b>	0	0	0	0

### Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.



**96. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:**

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0	0
<b>Total</b>	0	0	0	0	0

**97. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:**

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	0	0	0	0

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**

<b>98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:</b>	21
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<p><b>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>10</p>
<p><b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>11</p>
<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>7</p>
<p><b>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>3</p>
<p><b>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	4
<b>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	Lakewood Station had one sexual abuse allegation during the audit period. To evaluate the LASD's investigative practices, the audit team selected a random sample of 27 additional investigative files, including criminal and administrative investigations conducted by investigative staff assigned to ICIB, IAB, JIU, and units (jail facilities and station lockups). The audit team reviewed a total of 28 investigative files.
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p>a. Enter the <b>TOTAL NUMBER OF DOJ-CERTIFIED PREA AUDITORS</b> who provided assistance at any point during this audit:</p>	<p>2</p>
<p><b>Non-certified Support Staff</b></p>	
<p><b>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>a. Enter the <b>TOTAL NUMBER OF NON-CERTIFIED SUPPORT</b> who provided assistance at any point during this audit:</p>	<p>3</p>
<p><b>AUDITING ARRANGEMENTS AND COMPENSATION</b></p>	
<p><b>121. Who paid you to conduct this audit?</b></p>	<p><input type="radio"/> The audited facility or its parent agency</p> <p><input checked="" type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
<p><b>Identify your state/territory or county government employer by name:</b></p>	<p>County of Los Angeles</p>
<p><b>Was this audit conducted as part of a consortium or circular auditing arrangement?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>

<b>Standards</b>
<p><b>Auditor Overall Determination Definitions</b></p> <ul style="list-style-type: none"> <li>• Exceeds Standard (Substantially exceeds requirement of standard)</li> <li>• Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)</li> <li>• Does Not Meet Standard (requires corrective actions)</li> </ul>
<p><b>Auditor Discussion Instructions</b></p> <p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>

<b>115.111 Zero tolerance of sexual abuse and sexual harassment</b>
<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p>
<p><b>Auditor Discussion</b></p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s Pre-Audit Questionnaire (PAQ) Information</li> <li>2. Los Angeles County Sheriff’s Department (LASD), Custody Division Manual (CDM), 3-04/025.00, Prison Rape elimination Act of 2003 (PREA), Revised July 27, 2022</li> <li>3. LASD, CDM, 3-04/025.05, PREA – Sexual Abuse and Sexual Harassment, Revised April 3, 2018</li> <li>4. LASD, CDM, 3-04/025.45, Disciplinary Measures for Violating PREA Standards, Revised April 3, 2018</li> <li>5. LASD Organizational Chart, July 31, 2022</li> <li>6. LASD Custody Operations Organizational Charts</li> <li>7. Agency PREA Coordinator Interview</li> </ol> <p>115.111 (a)</p> <p>The facility indicated in the PAQ that the Los Angeles County Sheriff’s Department</p>

(hereinafter referred to as "LASD," "the Department," or "the Agency") has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract.

CDM, 3-04/025.00, Prison Rape Elimination Act of 2003 (PREA), is a two-page policy that includes information related to zero tolerance, PREA Coordinators, supervision and monitoring, sexual abuse incident review, and data collection and review. While the policy addresses zero tolerance of sexual abuse and sexual assault, it does not address zero tolerance of sexual harassment. Terminology throughout the policy is not uniform and, the policy includes terminology not defined in the PREA standards, i.e., sexual assault. Additionally, the policy does not outline the Agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment of people in custody. CDM, 3-04/025.05, PREA - Sexual Abuse and Sexual Harassment, includes definitions of prohibited conduct consistent with PREA. The Agency PREA Coordinator indicated the Agency is currently revising its zero-tolerance policy.

The agency/facility is not compliant with provision (a) of this standard. Corrective action is recommended.

#### 115.111 (b)

The audit team obtained LASD's most recent organizational chart, effective July 31, 2022. LASD is divided into four main operations: Custody Operations, Patrol Operations, Countywide Services, and Administrative and Professional Standards. Administrative and Professional Standards is overseen by the Undersheriff. Custody Operations, Patrol Operations, and Countywide Services are overseen by separate Assistant Sheriffs. The Agency PREA Coordinator is not included on the organizational chart.

The audit team was provided with 12 LASD Custody Operations Organizational Charts for review. Since January 2021, the organizational chart has been revised 12 times, and the Agency PREA Coordinator has reported to various positions within Custody Operations, including Assistant Division Director, Lieutenant, Commander, and Chief. The most recent organizational chart, effective July 27, 2022, indicates the Agency PREA Coordinator reports to the Chief of Custody Services Division Specialized Programs, who reports to the Assistant Sheriff of Custody Operations. It is important to note that the Facility Director of Lakewood Station reports within the chain of command of Patrol Operations overseen by the Assistant Sheriff of Patrol Operations. Therefore, the Agency PREA Coordinator is not within the Facility Director's chain of command and has no authority over Lakewood Station's operations.

During the interview with auditors, the Agency PREA Coordinator indicated he has sufficient time and authority to oversee agency-wide PREA implementation. The audit team worked very closely with the PREA Coordinator throughout the pre-onsite, onsite, and post-onsite phases of this audit. Throughout the different phases of this audit, it was evident that the Agency PREA Coordinator does not have sufficient authority to develop, implement, and oversee agency-wide efforts to comply with the PREA standards in all of its facilities. Additionally, the Agency PREA

Coordinator did not mention having conversations, interactions, or direct access to the Agency Head. The Agency is not compliant with provision (b) of this standard.

The Agency is not compliant with all provisions of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall revise its PREA policy to mandate zero tolerance of sexual abuse and sexual harassment of people in custody. Additionally, the policy shall outline the Agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment of people in custody. The policy shall include terminology defined in the PREA standards. Once revised, LASD shall implement, retrain, and institutionalize the revised policy.
2. LASD shall ensure the Agency PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all its facilities. LASD shall ensure the Agency PREA Coordinator reports to an upper-level executive and has authority over all operations that require efforts to comply with the PREA standards. The Agency PREA Coordinator shall also be included on LASD's Organizational Chart.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD revised its PREA policy to mandate zero tolerance of sexual abuse and sexual harassment of people in custody. A draft of the revised policy was provided to the audit team for review. The draft policy outlines the Agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment of people in custody. Additionally, the draft policy includes terminology defined in the PREA standards. The draft policy is consistent with the requirements of this standard. However, LASD did not finalize, implement, retrain, and institutionalize the revised policy. LASD did not demonstrate compliance with provision (a) of this standard.
2. The Agency PREA Coordinator remains reporting to the Chief of Custody Services Division Specialized Programs. The Agency PREA Coordinator does not report to an upper-level executive and does not have authority over all operations that require efforts to comply with the PREA standards. The Agency PREA Coordinator does not have sufficient authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all its facilities. Additionally, the Agency PREA Coordinator is not included on LASD's Organizational Chart. LASD did not demonstrate compliance with provision (b) of this standard.

The Agency is not compliant with all provisions of this standard.



<b>115.112</b>	<b>Contracting with other entities for the confinement of detainees</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. Agency PREA Coordinator Interview</li> <li>3. Facility Director Interview</li> <li>4. Correspondence with LASD's Fiscal Administration Bureau</li> </ol> <p>115.112 (a)-(b)</p> <p>According to information provided by Lakewood Station in the PAQ, the facility and its parent agency, LASD, do not contract with any private or public entities for the confinement of its detainees. The audit team confirmed with the Facility Director, Agency PREA Coordinator, and LASD's Fiscal Administration Bureau that the facility and agency do not contract with other entities for the confinement of its lockup detainees. The Agency is compliant with this standard.</p>

<b>115.113</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. LASD, CDM, 3-04/025.30, PREA - Supervision and Monitoring, Revised November 17, 2021</li> <li>3. Lakewood Station In-Service for August 24- 25, 2022</li> <li>4. Agency PREA Coordinator Interview</li> <li>5. Facility Director Interview</li> </ol> <p>115.113 (a)-(c)</p> <p>The facility indicated in the PAQ that LASD develops and documents a staffing plan for each lockup that provides for adequate levels of staffing, and, where applicable, video monitoring to protect detainees against sexual abuse.</p> <p>CDM, 3-04/025.30, PREA - Supervision and Monitoring, states the Department shall develop staffing plans for each facility, which provide for adequate levels of staffing and video monitoring to protect inmates against sexual abuse and sexual harassment. This policy states the Department shall take into consideration the</p>

following:

- Generally accepted detention and correctional practices;
- Any judicial findings of inadequacy;
- Any findings of inadequacy from federal investigative agencies;
- Any findings of inadequacy from internal or external oversight bodies;
- All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated);
- The composition of the inmate population;
- The number and placement of supervisory staff;
- Institutional programs occurring on a particular shift;
- Any applicable state or local laws, regulations, or standards;
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- Any other relevant factors

The policy requires the staffing plan be reviewed annually, or as needed, to ensure compliance with the approved staffing plan for each respective facility. The policy states the annual review shall be conducted with the Department's PREA coordinator, facility PREA compliance manager, facility scheduling personnel, and unit commander or designee. The annual review shall assess and document whether adjustments are needed to the following:

- The facility's staffing plan
- The facility's deployment of video monitoring systems and other monitoring technologies
- The resources the facility has available to commit to ensure adherence to the staffing plan

This policy also states that, in the event there are any deviations to the approved staffing plan, the on-duty watch commander of each shift shall justify and document all findings in the watch commander's log and the facility PREA compliance manager shall be notified via email.

The Facility Director indicated Lakewood Station's staffing plan is documented in the In-Service in the Scheduling Management System (SMS). The audit team reviewed the In-Service for August 24-25, 2022, which is a roster that indicates staff on duty, assignments, and scheduled hours. The audit team determined that Lakewood Station does not have a documented staffing plan that meets the requirements of the standard. The Agency PREA Coordinator indicated the Agency is working on developing a staffing plan for its patrol stations, including Lakewood Station. The agency/facility is not compliant with provisions (a)-(c) of this standard.

115.113 (d)

The facility indicated in the PAQ that it utilizes a screening process required by Standard 115.141 to identify vulnerable detainees and provide them with

heightened protection. As discussed under Standard 115.141 of this report, the use of the information to assess risk of sexual abuse or abusiveness is not institutionalized and is not consistently used to make housing determinations.

The facility did not demonstrate compliance with this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall develop and document a staffing plan for Lakewood Station that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect detainees against sexual abuse. The Agency PREA Coordinator shall be consulted with during the development of the staffing plan. In calculating adequate staffing levels and determining the need for video monitoring, LASD shall consider the physical layout of each lockup, the composition of the detainee population, the prevalence of substantiated and unsubstantiated incidents of sexual abuse, and any other relevant factors.
2. LASD shall develop and implement procedures regarding documentation of non-compliance with the staffing plan. All deviations from the staffing plan shall be documented and justified.
3. Whenever necessary, but no less frequently than once each year, Lakewood Station shall assess, determine, and document whether adjustments are needed to the staffing plan established pursuant to paragraph (a) of this section, prevailing staffing patterns, the lockup's deployment of video monitoring systems and other monitoring technologies; and the resources the lockup has available to commit to ensure adequate staffing levels.
4. LASD shall ensure Lakewood Station staff utilize the information obtained from the risk screening pursuant to Standard 115.141 to assess risk of sexual abuse or abusiveness. This information shall be utilized to ensure vulnerable detainees are provided with heightened protection.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD developed and documented a staffing plan and provided the audit team with a copy of the draft staffing plan for review. The draft staffing plan is consistent with the requirements of provision (a) of this standard. However, Lakewood Station did not finalize, implement, and institutionalize the staffing plan.
2. The draft staffing plan includes procedures regarding documentation of non-compliance with the staffing plan. However, Lakewood Station did not finalize, implement, and institutionalize the staffing plan.
3. Once implemented, Lakewood Station and LASD's Office of PREA Compliance plan to conduct a review of the staffing plan whenever necessary, but no less frequently than once annually. However, Lakewood Station did not finalize, implement, and institutionalize the staffing plan.
4. As discussed under Standard 115.141 of this report, the use of the information obtained from the risk screening process to assess risk of sexual

abuse or abusiveness is not institutionalized and is not consistently used to make housing determinations.

The Agency is not compliant with all provisions of this standard.

**115.114 Juveniles and youthful detainees**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

The following evidence was analyzed in making the compliance determination:

1. Lakewood Station's PAQ Information
2. LASD, CDM, 6-09/020.00, Secure Detention of Juveniles, Revised March 5, 2018
3. LASD, Manual of Policy and Procedures (MPP), 5-02/100.45, Juvenile Detention Restrictions and Procedures (601 & 602), Revised December 12, 2013
4. LASD, MPP, 5-02/035.10, Conditions of Secure Detentions, Revised January 15, 2020
5. Facility Director interview
6. Random Staff interviews
7. Observations made during the site review and informal discussions with staff

115.114

The facility indicated in the PAQ that Lakewood Station does not hold juvenile detainees in the same location as adult detainees. The facility indicated in the PAQ that it has held 92 juveniles in the facility in the past 12 months. The audit team was provided with three policies for review.

CDM, 6-09/020.00, Secure Detention of Juveniles, states if an adult inmate, including an inmate worker, is present with the juvenile in the same room or area, staff of the jail facility trained in the supervision of inmates shall maintain a constant, side-by-side presence with either the juvenile or adult inmate, to ensure there is no communication between the juvenile and adult inmate. This policy states situations in which a juvenile and an adult inmate may be in the same room or passageway shall be limited to the following:

- During booking
- During medical screening
- Inmate worker presence while performing work necessary for the operation of the jail facility, such as meal service and janitorial service
- Movement of inmates within the law enforcement facility

MPP, 5-02/100.45, Juvenile Detention Restrictions and Procedures (601 & 602), mandates that under no conditions shall a juvenile be incarcerated with adult prisoners.

MPP, 5-02/035.10, Conditions of Secure Detentions, mandates the following:

- The holding cell used to securely detain juveniles shall be equipped so as to allow the juvenile constant auditory access to the staff;
- Minors held in secure detention shall be visually checked periodically, no less than every 30 minutes, by a staff member;
- There shall be no communication between minors and adult prisoners; and
- If an adult prisoner, including an inmate worker, is present with the minor in the same room or area, staff of the law enforcement facility trained in the supervision of inmates shall maintain a constant, immediate presence with either the minor or adult prisoner, to ensure there is no communication between the minor and adult prisoner. Situations in which a minor and an adult prisoner may be in the same room or passageway shall be limited to the following:
  - During booking;
  - Awaiting visiting or sick call;
  - Inmate worker presence while performing work necessary for the operation of the law enforcement facility, such as meal service and janitorial service; and
  - Movement of persons in custody within the law enforcement facility.

During interviews with the Facility Director and random staff, a consistent description was provided regarding monitoring of juveniles, the area where juveniles are held, and line of sight to the juvenile holding area. Staff indicated juveniles are held in a secure area within the station but away from the lockup area where adults are held. Staff indicated juveniles are constantly monitored by sworn staff and cannot be held at the station for more six hours before being released to a guardian or juvenile facility.

During the site review, the audit team observed the area where juveniles are held and verified that the area is outside of the lockup area where adult detainees are held. The area consists of two adjacent rooms. Staff indicated that the doors, which contain large, tinted windows, are not locked when juveniles are held in the room but instead are secured via an alarm that is activated when the doors are opened. The rooms are located next to the watch sergeant's office and the walls between them contain large windows so that juveniles can be observed by the watch sergeant during their detention. There is an all-gender restroom directly across from the juvenile rooms that is available for the juveniles to be escorted to if needed. The audit team did not observe any juveniles in the lockup area during the onsite audit. The facility is compliant with this standard.

<b>115.115</b>	<b>Limits to cross-gender viewing and searches</b>
	<p data-bbox="280 188 1104 221"><b>Auditor Overall Determination:</b> Does Not Meet Standard</p> <hr/> <p data-bbox="280 264 564 297"><b>Auditor Discussion</b></p> <p data-bbox="280 340 1398 374">The following evidence was analyzed in making the compliance determination:</p> <ol data-bbox="341 443 1481 725" style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. LASD, CDM, 5-08/010.00 Searches, Revised on 4/11/2019</li> <li>3. LASD, CDM, 6-07/010.00, Inmate Searches, Revised on 3/5/2018</li> <li>4. Lesson Plan for Custody Assistant Academy Class #19.8, Person Searches</li> <li>5. Random Staff Interviews</li> <li>6. Detainee Interviews</li> <li>7. Observations made during the site review and informal discussions with staff</li> </ol> <p data-bbox="280 768 437 801">115.115(a)</p> <p data-bbox="280 844 1455 956">According to the information provided by the Lakewood Station in the PAQ, staff do not perform strip searches or visual body cavity searches of detainees. However, pat-down searches of detainees are performed.</p> <p data-bbox="280 999 1481 1447">Interviews with random staff confirmed that they do not perform strip searches or visual body cavity searches of detainees at the Lakewood Station lockup. Staff indicated that if exigent circumstances required that a strip search or visual body cavity search to be conducted, the detainee would be transported to a medical facility or LASD's Inmate Reception Center. Staff indicated that pat-down searches are conducted by staff of the same gender as the detainee and that there are always staff of the same gender available to conduct these searches. During the site review, the audit team noted ample staff available to conduct appropriate pat-down searches. The audit team did not observe any strip searches, visual body cavity searches, or cross-gender pat-down searches. The facility demonstrated compliance with provision (a) of this standard.</p> <p data-bbox="280 1489 437 1523">115.115(b)</p> <p data-bbox="280 1565 1445 1800">The facility indicated in the PAQ that staff do not perform strip searches or visual body cavity searches of detainees. Interviews with random staff confirmed this information. The audit team did not find any evidence that such searches are performed. Additionally, the audit team did not observe any strip searches, visual body cavity searches, or cross-gender pat-down searches during the site visit. The facility is compliant with provision (b) of this standard.</p> <p data-bbox="280 1843 437 1877">115.115(c)</p> <p data-bbox="280 1919 1439 2069">The facility provided CDM, 5-08/010.00, Searches, which states that each custody facility shall implement unit orders enabling inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or</p>

when such viewing is incidental to routine safety checks. This policy mandates that department personnel shall announce their presence whenever they enter areas where inmates of the opposite gender are showering, performing bodily functions, or changing clothing. The audit team requested the unit order for Lakewood Station, as required by the policy, and was informed that no such unit order exists.

During the site review, the audit team inspected all housing areas of Lakewood Station's lockup, including areas where detainees shower and perform bodily functions. The "A-Tank" is a large cell with soft padded floors that serves as the detox cell. The cell door leading to the A-Tank contains a mesh metal screen that makes it difficult to see into the cell. The cell contains one toilet/sink combination unit. A physical privacy barrier is installed next to the toilet/sink combination unit to reduce the opportunity for non-security-required observation during toilet use.

Housing area "B" is separated into two modules that are accessed through separate secured doors, each of which contain small windows. The first module contains cells B1 and B2, and each cell contains one toilet/sink combination unit. The cell doors to B1 and B2 have mesh metal screens that make it difficult to see into the cell. The second module contains cells B3, B4, and a shower area located directly in front of the secured doors at the end of the short hallway. Cells B3 and B4 each contain one toilet/sink combination unit. The cell door to B3 has a mesh metal screen that makes it difficult to see into the cell. Cell B4 is the only cell in the lockup with a "hard" cell door, which contains a small window.

Housing areas "C," "D," and "E" each contain two cells and a shower area. Each of these housing areas are accessed through separate secured doors that contain windows. The shower areas are located directly in front of the secured doors at the ends of the short hallways. All of the cells contain a toilet/sink combination unit. The cell doors for all six cells contain mesh metal screens that make it difficult to see into the cells. The facility noted housing area "C" functions as holding tanks due to the lack of beds. Housing area "D" is generally used to house female detainees. The audit team noted that housing area "D" contains a small window that was blocked by a piece of a paper stating, "Female Housing." This was the only secured entry door leading to a housing area with the window blocked.

The audit team noted that, with the exception of "A-Tank," the toilet/sink combination units inside the cells did not contain any physical barriers. However, the mesh metal screens on the cell doors appear to adequately block the view of inside the cells from the entry door windows to enable privacy for detainees during toilet use for the purpose of cross gender viewing. During the onsite audit, the audit team reviewed the live feed of the video monitoring system and noted cameras do not capture the inside of any of the cells, except for "A-Tank" which serves as the detox cell. In addition, the audit team did not observe any detainees in a state of undress.

The shower configurations in the Lakewood Station lockup raise concerns with opposite gender viewing. The shower areas are located directly in front of the secured entry doors at the ends of the short hallways, and no physical barriers are

installed in front of the shower areas to prevent cross-gender viewing from the windows on the doors. While the window on the door leading to housing area “D” was blocked by a piece of a paper, there were no such covering over the male housing area entry doors to prevent viewing outside of exigent circumstances, or when such viewing is incidental to routine cell checks by the predominantly female staff.

According to staff, showers are offered to detainees each morning. During the allotted shower time, lockup staff open the cell doors and allow detainees to access the showers one at a time. Staff provide detainees with toiletries and towels and let detainees know how much time they will have to shower. The secured entry door is then closed and locked during this time, in an effort to allow for privacy. Staff are aware of when showers are being provided and staff of the opposite gender do not enter the housing area. Additionally, safety checks are conducted by staff of the same gender during this time. Staff knock on the door and give detainees notice that shower time is almost over and instruct them to get dressed. Staff return and knock on the door and notify detainees that they will be entering.

The audit team did not observe any detainees showering during the onsite audit. The audit team requested to review video monitoring system footage to verify the protocols described by staff and ensure detainees can shower and change clothing without being viewed by staff of the opposite gender. However, Lakewood Station staff were unable to provide footage retained in the video monitoring system. As a result, the audit team was unable to verify whether these procedures were consistently followed.

During the site review, the audit team observed yellow signs posted on the secured doors leading to housing areas, which read “announce your gender before you enter.” The audit team observed staff announce their presence when entering an area that houses detainees of the opposite gender. Informal conversations during the site review and formal interviews with random staff indicated this practice was recently implemented. Informal conversations during the site review and formal interviews with detainees indicated these announcements were not consistently made when the audit team was not present. The facility did not demonstrate compliance with provision (c) of this standard.

115.115(d)

The facility provided two policies related to this provision of the standard. Both CDM 5-08/010.00, Searches, and CDM, 6-07/010.00, Inmate Searches, indicate the following:

- In all cases, a transgender or intersex person shall have their identity respected and be treated with dignity. Under no circumstances shall Department personnel search any person for the purpose of determining genital status or presence/absence of breasts or for the purpose of demeaning transgender or intersex individuals.
- Under no circumstance shall transgender or intersex individuals be subject



to more invasive search procedures than non-transgender or cisgender individuals.

- More invasive searches, including strip searches, visual body cavity searches, and physical body searches shall be, in all circumstances, conducted by officers of the gender requested by the transgender or intersex person. No Department personnel may be present who are not directly relevant to the search, and the search shall be conducted in private.
- If any deviation occurs regarding the policy for transgender and intersex searches, to include emergencies, an immediate supervisor shall be notified of the deviation, and it shall be noted in the e-UDAL.

CDM, 5-08/010.00, Searches, includes a section that states absent exigent circumstances, a pat-down/cursory search on a transgender or intersex inmate shall be conducted by a staff member of the same gender as that with which the inmate identifies, and if the inmate's genital status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or by referring the inmate to the Gender Identity Review Board. The policy goes on to mandate, that under no circumstances should this information be shared with other Department personnel unless directly pertinent to ensure an inmate's safety.

During interviews, random staff demonstrated a clear understanding of these policies and stated they would never search or physically examine a transgender or intersex detainee for the sole purpose of determining the detainee's genital status. Regarding pat-down searches, staff indicated transgender or intersex detainees would be asked their preference regarding the gender of the person to conduct the search. Staff indicated there is always ample staff of all genders available to conduct pat-down searches. There were no transgender or intersex detainees in custody for the audit team to interview during the onsite audit. The facility demonstrated compliance with provision (d) of this standard.

115.115(e)

According to information provided by Lakewood Station in the PAQ, all law enforcement staff have received training on conducting cross-gender pat-down searches and searches of transgender and intersex detainees in a professional and respectful manner, consistent with security needs. Staff indicated that pat-down searches are conducted by staff of the same gender as the detainee. Staff indicated transgender or intersex detainees would be asked their preference regarding the gender of the person to conduct the search. Staff indicated there is always ample staff of all genders available to conduct pat-down searches.

The audit team was provided with the lesson plan for Custody Assistant Academy Class #19.8, Person Searches. We reviewed the lesson plan and determined the training meets the requirements of provision (e) of this standard. The audit team was not provided with any course curriculum for training provided to deputies regarding cross-gender pat-down searches and searches of transgender and intersex detainees. Additionally, the audit team was not provided with any training

records that demonstrate lockup staff have completed training required by provision (e) of this standard. Additional training documentation is required to demonstrate compliance with provision (e) of this standard.

The facility is not compliant with provisions (c) and (e) of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. Lakewood Station shall develop, implement, and institutionalize a unit order that enables detainees 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. Alternatively, LASD can revise CDM 5-08/010.00 and remove the requirement for a separate unit order for each custody facility and include the requirements of Standard 115.115 in current departmental policy.
2. LASD shall ensure staff announce their presence whenever they enter areas where inmates of the opposite gender are showering, performing bodily functions, or changing clothing.
3. Lakewood Station shall provide the audit team with access to retained CCTV footage to allow the audit team to evaluate the facility's compliance with provision (c) of this standard.
4. LASD shall provide the audit team with additional training records and course materials that demonstrate that the Agency trains law enforcement staff on how to conduct cross-gender pat-down searches, and searches of transgender and intersex detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. This shall include curriculum for training provided to deputies and training records for deputies and CAs.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD revised CDM 5-08/010.00, Searches, and a draft of the revised policy was provided to the audit team for review. The draft policy is consistent with the requirements of provision (c) of this standard. However, LASD did not finalize, implement, retrain, and institutionalize the revised policy.
2. The audit team conducted a site visit on April 11, 2023, at Lakewood Station. During the site visit, the audit team did not observe staff announce their presence whenever they entered areas where inmates of the opposite gender showered, performed bodily functions, or changed clothes.
3. Lakewood Station provided the audit team with CCTV footage of showers being conducted. The audit team verified that procedures for detainee showers are consistent with the requirements of provision (c) of this standard. Additionally, during the site visit on April 11, 2023, the audit team observed staff following procedures for detainee showers that are consistent with the requirements of provision (c) of this standard.

	<p>4. The audit team has not received additional training records, curriculum, or course materials that demonstrate the agency trains law enforcement staff on how to conduct cross-gender pat-down searches, and searches of transgender and intersex detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.</p> <p>The facility/agency is not compliant with provisions (c) and (e) of this standard.</p>
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<b>115.116</b>	<b>Detainees with disabilities and detainees who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. LASD, CDM, 03-04/025.40, PREA – Inmate Education, Revised April 3, 2018</li> <li>3. LASD, MPP, 5-09/005.40, Communication Through Telecommunications Devices for the Deaf (TDD), Revised April 1, 1996</li> <li>4. LASD, MPP, 2-07/140.60, The American with Disabilities Act (ADA) Unit, Revised December 12, 2003</li> <li>5. LASD, CDM, 5-14/060.00, Use of Interpreter, Revised December 10, 2021</li> <li>6. LASD, MPP, 3-09/004.00, Limited English Proficiency and Language Assistance Plan, Revised April 8, 2018</li> <li>7. LASD, CDM, 5-01/005.00, Prioritization List for Sign Language Interpreter Requests</li> <li>8. LASD, CDM, 6-06/030.00, Developmentally Disabled Inmates</li> <li>9. Observations made during the site review and informal discussions with staff</li> <li>10. LASD Zero Tolerance Posters</li> <li>11. LASD PREA Zero Tolerance Pamphlet (SH-J-478)</li> <li>12. LASD Station Jail Orientation Form (SH-R-449), Revised May 2022</li> <li>13. Agency Head Designee Interview</li> <li>14. Random Staff Interviews</li> <li>15. Detainee Interviews (Detainees with disabilities or who are limited English proficient)</li> <li>16. Information from LASD's ADA Unit</li> <li>17. Information from LASD's Sheriff's Information Bureau</li> <li>18. Information from Inmate Services Bureau staff</li> </ol> <p>115.116 (a)-(b)</p>

According to information provided by Lakewood Station in the PAQ, LASD has established procedures to provide disabled and limited English proficient (LEP) detainees with 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.

CDM, 03-04/025.40, PREA - Inmate Education, states the Department shall provide inmate education in formats accessible to all inmates including those who are limited in English proficiency, deaf, visually impaired or otherwise disabled, as well as those who have limited reading skills.

MPP, 5-09/005.40, Communication Through Telecommunications Devices for the Deaf (TDD), requires that any service or interaction that might ordinarily involve communication via telephone must also be available through TDDs.

MPP, 2-07/140.60, The American with Disabilities Act (ADA) Unit, requires the ADA Unit helps to ensure that inmates with disabilities have access to all programs that all other inmates receive.

CDM, 5-14/060.00, Use of Interpreter, states all facilities shall attempt to make the services of an appropriate bilingual officer available to non-English speaking inmates. This policy also states the bilingual officer shall explain jail house rules and regulations and answer specific questions to ensure clear communications. This policy also states that in the event an appropriate bilingual officer is not available, another inmate with knowledge of the desired language may be utilized. This inmate will translate jail rules and assist as needed in the clarification of jail procedures.

MPP, 3-09/004.00, Limited English Proficiency and Language Assistance Plan, states it is the policy of LASD to provide accurate and effective communication with members of the public regardless of their level of English proficiency. This policy states the Department shall strive to eliminate or reduce, to the maximum extent practicable, LEP as a barrier to accessing assistance or utilization of Department programs and services. This policy also states the following:

- Department members shall take reasonable steps to ensure effective and accurate communication with a LEP individual when providing assistance or Department programs and services.
- Personnel will use qualified bilingual persons as translators and interpreters as set forth in this policy. A "qualified bilingual person" as used in this plan is a qualified County interpreter (MPP 3-02/180.00, Bilingual Bonus), including employees or persons available through the civilian volunteer program or persons available through the Sheriff's Information Bureau bilingual services program who have passed the Los Angeles County fluency examination for the language involved.
- Immigration authorities shall not be used as interpreters for law enforcement matters relating to individuals in Department custody, even if otherwise qualified. Language assistance should be provided at a time and

place that avoids the effective denial of assistance, service, or rights to the LEP person.

- Department members should avoid using persons biased for or against one of the parties and minor children under the age of 12 to assist in interpretation unless there is no available alternative. Department members should also avoid using a family member as an interpreter in a matter involving domestic violence absent exigent circumstances.
- Each station, in the respective booking/detention areas, shall prominently display signage, printed in English as well as the prevalent spoken language(s) for that Department station service area as determined by the unit commander, detailing information regarding access to the Bail Commissioner, the Public Defender's Office, information on minor childcare, and the prisoner's right to complete three phone calls. In the event a LEP individual indicates they cannot read the posted information, department personnel will make reasonable efforts to provide appropriate language services.
- To maintain consistency and uniformity, each facility shall post both the English and Spanish versions of the Custody Services Division Inmate Rules and Regulations as listed in Custody Division Manual section 7- 33/000.00, "Inmate Rules and Regulations." For those inmates who are unable to read English or Spanish, provisions shall be made for the jail staff to verbally instruct them or provide them with material, in an understandable form, regarding jail rules and disciplinary procedures and penalties.

The audit team did further research and found LASD, CDM, 5-01/005.00, Prioritization List for Sign Language Interpreter Requests, which states LASD shall ensure effective communication for inmates who are deaf or hard of hearing in a custody facility or reception center. This policy states this is achieved through the licensed and contracted interpreter system which provides qualified sign language interpreters and/or captioning by means of video teleconferencing. The policy does not provide guidance to staff on how such assistance can be obtained for detainees.

The audit team spoke with LASD's Americans with Disabilities Act (ADA) Unit staff regarding resources available for staff at patrol stations. ADA Unit staff indicated patrol station staff can utilize the language line for audible interpretation services. They also indicated LASD has an encumbrance with Life Signs Incorporated for certified sign language interpretation services. Upon request, Life Signs can dispatch a qualified interpreter to a facility 24 hours a day, 7 days a week.

The audit team requested a copy of LASD's contract for language line interpretation services from LASD's Fiscal Administration Bureau, but were not provided with a copy of the contract. Interviews with randomly selected staff indicated not all staff are aware of this resource or indicated they have never had to use it because most detainees speak enough English to communicate with them.

The audit team spoke with Sheriff's Information Bureau (SIB) staff regarding interpretation services available to LASD patrol stations. SIB staff indicated LASD

staff can call SIB to request an interpreter. When a call is received, SIB sends an email to a group for the specific language requested. The available staff calls the contact listed in the email directly to provide interpretation services. SIB staff indicated there are over 60 languages spoken throughout the Department and it is constantly growing with new hires. It is unclear whether individuals providing interpretation through SIB are qualified interpreters.

The audit team spoke with Inmate Services Bureau (ISB) staff regarding resources available for staff at patrol stations. ISB indicated CDM, 6-06/030.00, Developmentally Disabled Inmates, provides guidance regarding developmentally disabled inmates. This policy requires that when there is a high probability that a developmentally disabled person will be in LASD's custody for more than 24 hours, a Los Angeles County Regional Center must be contacted and advised. A Los Angeles County Regional Center will have a representative respond, act as legal guardian for the inmate, and assist them with arranging bail, etc. If the inmate will not be held more than 24 hours, it is not mandatory that a Los Angeles County Regional Center be contacted. However, the policy indicates they can be a valuable resource if the inmate is uncooperative or uncommunicative during the booking process.

There are several LASD policies that identify requirements regarding detainees who are LEP or disabled. However, observations made during the site review and interviews with randomly selected staff indicated a lack of awareness regarding these requirements and the resources available to staff. During the site review, the audit team noted LASD PREA Zero Tolerance Posters in English and Spanish in the intake area and throughout the lockup. These posters include information regarding how to report allegations of sexual abuse and/or sexual harassment. The audit team observed the intake process and noted detainees are shown the PREA Zero Tolerance Pamphlet and the Station Jail Orientation Form. However, the audit team noted there is not a consistent practice of providing detainees with a verbal explanation of the information. Staff indicated PREA information is provided in English and Spanish only, which is consistent with the audit team's observations during the site review. Staff were unaware of how to obtain PREA information in other languages. Although staff were aware that interpretation services are available, many staff indicated they have never had to utilize such services because most detainees can communicate in English. Staff were unaware of how to obtain PREA information in other formats that can be understood by detainees who are deaf, visually impaired, disabled, developmentally delayed, mentally ill, or have limited reading skills. Staff indicated the TDD has not been utilized for approximately two years due to issues with the telephone line.

The Agency Head Designee indicated LASD PREA information is available in various languages for LEP detainees. Regarding assistance for disabled detainees, he indicated each patrol station lockup has a TDD that can be utilized. Regarding mentally ill inmates, he indicated lockup staff can call LASD's Mental Evaluation Team (MET) for assistance with mentally ill detainees. The Agency Head Designee indicated patrol station lockups can also complete a Behavioral Observation and Mental Health Referral (BOHMR) and transport a detainee to LASD's IRC, where staff

can better assist these detainees.

The facility was unable to formally identify detainees who are LEP or disabled. Detainees in these categories were identified through conversations with staff or the detainees themselves during the site review. One LEP detainee indicated they did not receive the Agency's zero tolerance information and did not understand what they were signing during the booking process. Additionally, the detainee indicated that they were not provided an interpreter or information in a format they could understand. The audit team identified two detainees with intellectual disabilities. Both detainees indicated they received PREA information at booking. However, both indicated staff did not go over the information with them. Both detainees did not convey an understanding of how to report an allegation of sexual abuse or sexual harassment.

115.116 (c)

According to information provided by Lakewood Station in the PAQ, LASD policy prohibits use of detainee interpreters, detainee readers, or other types of detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety, the performance of first-response duties under Standard 115.164, or the investigation of the detainee's allegations. The facility indicated it does not document the limited circumstances in individual cases where detainee interpreters, readers, or other types of detainee assistants are used. It is recommended that Lakewood Station develop and implement a system for tracking the limited circumstances in individual cases where detainee interpreters, readers, or other types of detainee assistants are used. The facility did not demonstrate compliance with provisions (a) and (b) of this standard.

Interviews with randomly selected staff indicated most staff would not rely on detainee interpreters, detainee readers, or other types of detainee assistants except in very limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety. However, some staff were not aware of agency policy regarding detainee interpreters and/or indicated they would never utilize one. The facility did not demonstrate compliance with provision (c) of this standard.

The facility/agency is not compliant with all provisions of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall take appropriate steps to ensure that detainees with disabilities (including detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities) have an equal opportunity to participate in or benefit from all aspects of the Agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with detainees who are deaf or hard of

hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, LASD shall ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities, including detainees who have intellectual disabilities, limited reading skills, or who are blind or have low vision.

2. LASD shall 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 detainees who are LEP, including steps to provide qualified interpreters, and providing written materials in formats or through methods that ensure effective communication.
3. LASD shall institutionalize policies that identify requirements regarding detainees who are LEP and/or disabled. LASD shall train staff on the requirements of these policies and any resources available. This training shall also include policy and guidance regarding when it is appropriate to utilize inmate interpreters.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD developed materials and identified additional resources to ensure that detainees with disabilities (including detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities) have an equal opportunity to participate in or benefit from all aspects of the Agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. However, LASD did not finalize, implement, and institutionalize these materials and resources.
2. The audit team conducted a site visit to Lakewood Station on April 11, 2023. During the site visit, staff were unaware of how to provide PREA information to detainees who are deaf or hard of hearing, those who are blind or have low vision, have intellectual disabilities, or are limited English proficient. Staff did not know how to provide a qualified interpreter. Additionally, staff did not know how to obtain PREA pamphlets in languages other than English and Spanish.
3. LASD did not institutionalize policies that identify requirements regarding detainees who are LEP and/or disabled. LASD did not train staff on the requirements of these policies and resources available.

The facility/agency is not compliant with all provisions of this standard.



**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

The following evidence was analyzed in making the compliance determination:

1. Lakewood Station's PAQ Information
2. LASD, MPP, 2-07/080.20, Pre-Employment Unit, Revised on December 12, 2013
3. LASD, MPP, 3-01/060.05, Pre-Employment Investigations, Revised on December 12, 2013
4. LASD, MPP, 3-01/050.30, Off-Duty Incidents, Revised on August 4, 2021
5. Personal History Statement, Revised in February 2013
6. Intake Interview Questionnaire, Revised in August 2016
7. Pre-Investigative Questionnaire, Not dated
8. Security Clearance Application, Not dated
9. Personnel files
10. Specialized Staff Interviews - Administrative/Human Resources Staff (Personnel Administration Bureau staff)
11. Informal conversations and correspondence with Personnel Administrative Bureau (PAB) staff
12. Informal conversations and correspondence with Pre-Employment Unit staff

115.17 (a)-(d)

The facility indicated in the PAQ that agency policy prohibits hiring or promoting anyone who may have contact with detainees and prohibits enlisting the services of any contractor who may have contact with detainees who: (1) 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); (2) has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

The Agency indicated in the PAQ that 279 people were hired in the 12 months preceding the audit. However, the individuals were not assigned to Lakewood Station and work within other areas of LASD. The facility indicated in the PAQ that they have not promoted anyone in the 12 months preceding the audit. However, the Office of PREA Compliance provided a listing that indicates approximately 50 staff were promoted during this period. In order to better understand the Agency's practices regarding hiring and promotions, the audit team requested personnel files for a sample of 22 randomly selected individuals assigned to Lakewood Station, including 20 employees (sworn and civilian) and 2 contractors. The Agency provided two policies for review regarding provision (a) of this standard.

MPP, 2-07/080.20, Pre-Employment Unit, which outlines the responsibilities of the

Pre-Employment Unit, states the unit has the following responsibilities:

- Investigate the character and background of prospective professional staff applicants.
- Ensure applicants meet established hiring standards, including Federal, State, and local statutes.
- Conduct background investigations on professional staff applicant positions including medical services positions.
- Conduct security clearances on employees hired on a contractual basis.

MPP, 3-01/060.05, Pre-Employment Investigations, states an investigation to determine suitability shall be conducted into the character and background of each candidate (Deputy or civilian) for employment with the Department. This policy mandates that candidates with criminal records, questionable loyalty or morals and unstable personalities shall be rejected when investigation establishes facts which warrant such action. This policy also states the Department has an indispensable obligation to the public to ensure that only suitable individuals are employed, since the functions of the Department involve the protection of life and property and the enforcement of the law; fundamentally, all functions of the Department are in the interest of public welfare and safety; and Peace officers, by law, are endowed with authority far beyond that possessed by the ordinary citizen.

The Pre-Employment Unit indicated that LASD conducts a thorough background investigation, including a criminal background records check (federal, state, and local) and contact with prior employers, for all candidates in order to ensure they meet the standards of LASD. The Pre-Employment Unit indicated that LASD did not implement live scan fingerprinting until January 1, 2001, and thus, anyone hired prior to this date has not been live scan fingerprinted. Pre-Employment Unit indicated background checks of contractors are conducted every two years. However, LASD did not provide any departmental policy which requires background checks of contractors every two years.

The Pre-Employment Unit provided copies of forms completed by applicants during the hiring process. The audit team reviewed these documents to determine if applicants are asked questions about previous misconduct described in paragraph (a) of the standard. The audit team noted questionnaires completed by applicants include questions that meet the requirements of (a)(1) and (a)(2), but not (a)(3).

Of the 22 requested personnel files, the audit team was provided with 13 employee files. The Pre-Employment Unit was unable to provide personnel files for the remaining 7 employees and 2 contractors. According to Pre-Employment Unit staff, a background check was not completed by LASD for the two contractors. Our review of the 13 employee personnel files noted documentation of a thorough background investigation and completion of the questionnaires. For those hired after January 2001, we noted confirmation of live scan fingerprinting.

The audit team was not provided with any personnel files for promotions. PAB indicated that the questions about previous misconduct described in paragraph (a)

of the standard are not asked during the promotion process. Staff indicated that the promotion process includes a review of the Performance Recording and Monitoring System (PRMS) for any allegations and/or incidents involving the employee. The Agency did not demonstrate compliance with provisions (a), (b), and (d) of this standard.

#### 115.17 (e)

LASD did not provide any policy requiring that either criminal background record checks be conducted at least every five years for current employees and contractors who may have contact with detainees or that a system is in place for otherwise capturing such information for all current employees.

Pre-Employment Unit staff indicated the live scan fingerprinting system provides real time notification of employee arrests. However, as stated above, LASD implemented live scan fingerprinting on January 1, 2001. Therefore, anyone hired prior to this date was not live scan fingerprinted. Additionally, PAB staff indicated a background check was not conducted for the two contractors in our sample. The Agency did not demonstrate compliance with provision (e) of this standard.

#### 115.17 (f)-(g)

As stated above, the audit team noted questionnaires completed by employees during the hiring process include questions that meet the requirements of (a)(1) and (a)(2), but not (a)(3). While these documents include admonishments indicating that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination, all required questions are not asked of all applicants. LASD did not provide a policy which mandates that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

The audit team was provided with MPP, 3-01/050.30, Off-Duty Incidents, which states staff who are arrested or detained for any offense, or named as a suspect, other than an infraction under the Vehicle Code, shall immediately notify their immediate supervisor or watch commander of the facts of the arrest, detention, or allegation. However, provision (f) requires the agency impose upon employees a continuing affirmative duty to disclose any such misconduct described in paragraph (a) of this standard. The Agency did not demonstrate compliance with provisions (f) and (g) of this standard.

#### 115.17 (h)

LASD did not provide any policies requiring provision of 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.

It is unclear if LASD is prohibited by law from providing 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. LASD indicated a response from Los Angeles County's Office of County Counsel is pending.

The Agency did not demonstrate compliance with this standard. Corrective action is recommended.

Standard 115.117 - Hiring and promotion decisions

Corrective Action issued October 14, 2022:

1. LASD shall not hire or promote anyone who may have contact with detainees, and shall not enlist the services of any contractor who may have contact with detainees, who: (1) 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); (2) has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.
2. LASD shall 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 detainees. This consideration shall be documented and retained in the personnel file. LASD shall provide the audit team with access to personnel files for all Lakewood Station employees who were promoted during the 12 months preceding the audit for review.
3. LASD shall perform a criminal background record check before enlisting the services of any contractor who may have contact with detainees. LASD shall determine if a criminal background records check was not conducted for any contractor currently assigned to Lakewood Station and immediately conduct a criminal background records check. Additionally, these contractors shall be live scanned. Once this process is completed, LASD shall provide the audit team with the contractor personnel files for review.
4. LASD shall conduct a criminal background record check at least every five years of current employees who may have contact with detainees or ensure they are live scan fingerprinted so there is a system in place that meets the requirements of provision (e) of this standard. This shall include ensuring all current employees and contractors who may have contact with detainees that were hired prior to January 1, 2001, are live scan fingerprinted. LASD shall provide the audit team with proof that employees and contractors hired prior to January 1, 2001, have been live scan fingerprinted.
5. LASD shall ask all applicants and employees who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. LASD shall also impose upon employees a continuing

affirmative duty to disclose any such misconduct, and material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. For applicants, LASD shall revise the current questionnaires utilized during the hiring process to include the required questions. For promotions, LASD shall ensure the required questions are asked and answered through written applications or self-evaluations completed by the employee or during interviews. LASD shall ensure documentation of questions being asked and answered are retained in personnel files for future auditor review.

6. LASD shall determine if it is prohibited by law from providing 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. LASD shall provide this information to the audit team. Unless prohibited by law, LASD shall 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.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. On November 8, 2022, LASD implemented revised questionnaires for applicants and employees seeking promotion to ask whether the individual (1) 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); (2) has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) has been civilly or administratively adjudicated to have engaged in the activity described in (2) above. The revised questionnaires are consistent with the requirements of provision (a) of this standard. The Agency demonstrated compliance with provision (a) of this standard.
2. LASD provided the audit team with personnel files for all Lakewood Station employees that were promoted during the 12 months preceding the audit. During the promotion process, a review of PRMS is conducted to evaluate any allegations and/or incidents involving the employee, including incidents of sexual harassment. LASD stated that the results of the PRMS review are strongly considered when making promotion and assignment decisions. The Agency demonstrated compliance with provision (b) of this standard.
3. LASD conducted live scan background record checks for all current contractors assigned to Lakewood Station. Additionally, LASD now requires station personnel to conduct live scan background record checks prior to contact with detainees. The Agency demonstrated compliance with provision (d) of this standard.
4. LASD added live scan fingerprints to the FBI/DOJ database for all active employees assigned to Lakewood Station that were hired prior to January 1,

	<p>2001. Employees that are currently on relieved of duty status or off work due to an injury have not been live scanned. These employees will be live scanned prior to returning to work and having contact with detainees. LASD is in the process of conducting agency wide live scanning of all employees that have contact with detainees and were hired prior to January 1, 2001. The Agency demonstrated compliance with provisions (c) and (e) of this standard.</p> <p>5. As stated above, on November 8, 2022, LASD implemented revised questionnaires for applicants and employees seeking promotion. The LASD questionnaires include admonishments indicating that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Employees continue to be required to report all contact with law enforcement where they are named as a suspect in a report or arrested for a crime. The Agency demonstrated compliance with provisions (f) and (g) of this standard.</p> <p>6. LASD provided a response from the Los Angeles County's Office of County Counsel which states in part, LASD is not prohibited by law from providing 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. Additionally, the response stated, a waiver from the former employee is required by law for LASD to provide a prospective employer with any substantiated findings of sexual harassment against a coworker or a member of the public, including a detainee. LASD provided the audit team with the waiver form for review. The Agency demonstrated compliance with provision (h) of this standard.</p> <p>The Agency is compliant with all provisions of this standard.</p>
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<b>115.118</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. Information from LASD's Data Systems Bureau</li> <li>3. Agency Head Designee Interview</li> <li>4. Facility Director Interview</li> </ol>

## 5. Agency PREA Coordinator Interview

### 115.118 (a)

According to information provided by Lakewood Station in the PAQ, the agency/facility has not acquired a new facility or made a substantial expansion or modification to existing facilities since August 20, 2012. Therefore, provision (a) of this standard does not apply to Lakewood Station.

### 115.118 (b)

According to information provided by Lakewood Station in the PAQ, Lakewood Station installed or updated its video monitoring system in May 2022. According to the Department's Data Systems Bureau, the video monitoring system was updated with new cameras and also expanded with the installation of additional cameras.

The Agency Head Designee indicated the Agency PREA Coordinator is consulted with when designing, acquiring, or planning substantial modifications to facilities. The Facility Director indicated overall safety, including sexual safety, is considered when installing or updating monitoring technology, such as the station's video monitoring system. However, the Agency PREA Coordinator indicated he was not consulted with for the recent video monitoring system update and expansion at Lakewood Station. Additionally, the agency/facility did not demonstrate that it considered how updating and expanding such technology may enhance the agency's ability to protect detainees from sexual abuse. Therefore, the agency/facility is not compliant with provision (b) of this standard.

The facility/agency is not compliant with provision (b) of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, facilities shall ensure the Agency's PREA Coordinator is consulted with regarding how such technology may enhance the Agency's ability to protect detainees from sexual abuse.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. On March 29, 2023, the Agency PREA Coordinator inspected and assessed the May 2022 video monitoring upgrades at Lakewood Station and provided the audit team with a memorandum documenting the assessment. LASD provided the audit team with draft policies that include guidelines to ensure the Agency's PREA Coordinator is consulted regarding any changes or upgrades to a lockup's video monitoring system, which is consistent with the requirements of this standard. However, the Agency's PREA Coordinator was

not consulted with regarding recently completed upgrades to the video monitoring system at one lockup and scheduled upgrades to video monitoring systems at three additional lockups. LASD did not demonstrate that it considers the Agency's ability to protect detainees from sexual abuse when installing or updating video monitoring systems.

The Agency is not compliant with provision (b) this standard.

115.121	Evidence protocol and forensic medical examinations
	<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. LASD, CDM, 3-04/025.10, PREA, First Responder Duties and Coordinated Response Protocol, Revised May 3, 2018</li> <li>3. LASD PREA Response Card</li> <li>4. Incident Report and Supplemental Report</li> <li>5. H.R. 5578 — 114th Congress: Survivors' Bill of Rights Act of 2016</li> <li>6. California Penal Code section 13823.95</li> <li>7. U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," Second Edition, NCJ 228119, April 2013</li> <li>8. County of Los Angeles, Department of Health Services, Sexual Assault Response Team (SART) Center Standards, Reference No. 324</li> <li>9. County of Los Angeles, Department of Health Services, SART Center Roster</li> <li>10. Agency PREA Coordinator Interview</li> <li>11. Facility Director Interview</li> <li>12. Random Staff Interviews</li> </ol> <p>115.121 (a)</p> <p>The facility indicated in the PAQ that it conducts its own administrative and criminal sexual abuse investigations. The facility indicated that agency investigators follow a uniform evidence protocol when conducting a sexual abuse investigation.</p> <p>The facility did not provide the audit team with a uniform evidence protocol and indicated in the PAQ issue log that the "protocol is in the policy." Expanded course outlines for LASD's Criminal Investigations and Sexual Assault Investigations Courses were provided for review. While physical evidence collection and preservation is mentioned in the Criminal Investigations Course outline, the course curriculum was not provided. Therefore, the audit team could not determine if a</p>



uniform evidence protocol is included in these courses. The facility provided the audit team with the following two policies for review.

CDM, 3-04/025.10 PREA, First Responder Duties and Coordinated Response Protocol, outlines staff first responder duties. The policy states that upon learning of an allegation that an inmate was sexually abused, department personnel shall:

- Separate the alleged victim(s) and suspect(s).
- Preserve and protect the crime scene until appropriate steps can be taken to collect any evidence.
- If the abuse occurred within the past 120 hours, request the alleged victim, if known, not take any actions that could destroy physical evidence prior to its collection, including but not limited to, washing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating.
- If the abuse occurred within the past 120 hours, and the quality of the evidence appears to support criminal prosecution, ensure the alleged abuser, if known, does not take any actions that could destroy physical evidence prior to its collection, including but not limited to, washing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating (as much as is feasible).

The policy states every facility shall establish a "Coordinated Response Protocol" for procedures that shall be followed when there is a report received, whether made verbally or in writing, including third-party and anonymous reports of sexual abuse involving an inmate. It shall include the following:

- First responder duties
- Supervisor responsibilities
- Notifications to CIS
- Notification to Unit Commander
- Notification to Watch Commander
- Notification to PREA Coordinator
- PREA Compliance Manager responsibilities
- Medical and mental health staff responsibilities for immediate and follow-up care
- Contracted hospital(s) where the inmate will be transported to if a forensic Sexual Assault Rape Treatment Protocol (SART) exam is required
- Procedures for providing outside resources to the inmate (e.g., victim advocate during SART exam, contact with rape crisis centers for emotional support, etc.)

The audit team was not provided with a Coordinated Response Protocol for Lakewood Station.

The Agency PREA Coordinator indicated the LASD PREA Response Card was created for deputies as a resource in the event they are a first responder. The instructions included on this card for responding deputies is consistent with instructions

provided in CDM, 3-04/025.10, PREA, First Responder Duties and Coordinated Response Protocol.

The audit team researched and found one departmental policy that was not provided in the facility's PAQ. At the audit team's request, MPP, 5-09/350.05, Responsibilities of Station/Unit Personnel and Responding Deputies on Rape and Sexual Assault Cases, was provided by the Office of PREA Compliance. The audit team reviewed this policy and noted it is relevant to responding deputies and evidence collection. Pursuant to a report of an alleged rape or sexual assault, this policy requires the first responding deputy proceed as follows:

- If the sexual assault incident occurred within 96 hours, transport the victim to the nearest County contracted hospital for treatment and obtain laboratory specimens in the manner prescribed for Department sexual assault evidence kits (sexual assault incidents that are over 96 hours old, do not require an immediate medical examination);
- If the suspect is detained and the incident occurred within 96 hours, transport the suspect to the nearest County contracted hospital for treatment and obtain laboratory specimens in the manner prescribed for Department sexual assault evidence kits (sexual assault incidents which are over 96 hours old, do not require an immediate medical examination). If sexual assault exams are conducted on the victim and the suspect, ensure that they are kept separated at all times.
- Immediate notification shall be made to Special Victims Bureau without undue delay.

This departmental policy conflicts with CDM, 3-04/025.10, PREA, First Responder Duties and Coordinated Response Protocol and the LASD PREA Response Card. MPP, 5-09/350.05, instructs first responding deputies to transport the victim(s) for treatment and a forensic medical examination if the incident occurred within 96 hours. This timeline differs from best practice outlined in the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," which states many jurisdictions have now extended the standard cutoff time (e.g., to 5 days or 1 week). Additionally, MPP, 5-09/350.05, instructs responding deputies to make immediate notification to the Special Victims Bureau. However, the Special Victims Bureau does not conduct investigations of allegations of sexual abuse that occur in LASD's custody facilities. The Department should ensure this policy is revised accordingly.

The Agency PREA Coordinator and Facility Director indicated that upon receiving a report of sexual abuse, the facility would refer to the Agency policy to coordinate a response to an incident. Interviews with random staff indicated that first responders would notify their supervisor, separate the alleged victim(s) and suspect(s), and secure the crime scene. Interviews with staff who could be first responders did not indicate awareness of the LASD PREA Response Card. Several staff interviewed indicated they would be responsible for preliminary investigative steps, which

includes collection of evidence. However, they did not articulate a uniform evidence protocol. Staff did not provide details regarding what should be preserved, how it should be preserved, or when it should be preserved. Investigative staff indicated first responders and deputies conducting preliminary investigative steps would secure the crime scene and preserve and/or collect evidence. It was also mentioned that LASD's crime lab collects evidence.

The facility did not demonstrate compliance with provision (a) of this standard.

115.121 (b)

Lakewood Station does not house juveniles and youthful detainees. Juveniles are not held in the lockup and cannot be held at the station for more than six hours before being released to a guardian or juvenile facility. See Standard 115.114 for additional analysis regarding juveniles and youthful detainees at Lakewood Station.

The facility did not provide the audit team with a uniform evidence protocol for review. Therefore, we were unable to determine if the protocol was 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. The facility did not demonstrate compliance with provision (b) of this standard.

115.121 (c)

According to information provided by Lakewood Station in the PAQ, the facility offers all detainees who experience sexual abuse access to forensic medical examinations. The facility indicated forensic medical examinations are offered without financial cost to the victim. The facility indicated such examinations are always provide by a Sexual Assault Nurse Examiner (SANE) or Sexual Assault Forensic Examiner (SAFE). The facility had one allegation of sexual abuse in the 12 months preceding the audit.

CDM, 3-04/025.10 PREA, First Responder Duties and Coordinated Response Protocol, states treatment services shall be provided to the victim without financial cost, regardless of whether the victim names the suspect or cooperates with an investigation from the incident.

The Survivors' Bill of Rights Act of 2016 states a sexual assault survivor has a right not to be prevented from, or charged for, receiving a medical forensic examination. Additionally, California Penal Code section 13823.95 states any costs incurred by a qualified health care professional, hospital, clinic, sexual assault forensic examination team, or other emergency medical facility for a medical evidentiary examination of a victim of a sexual assault shall not be charged directly or indirectly to the victim of the assault.

The audit team conducted research and found the Los Angeles County Department of Health Services' Sexual Assault Response Team (SART) Center Standards.

Department of Health Services established the minimum standards required for the designation of SART Team Centers in Los Angeles County. The SART Centers provide care to victims of sexual assault by meeting specific requirements for professional staff, quality improvement, education, support services, equipment, supplies, medications, and established policies and procedures. SART Center initial designation and SART Center re-designation is granted for a period of three years after satisfactory review by Department of Health Services' Emergency Medical Services Agency. The audit team reviewed the SART Center Roster and noted 10 facilities that detainees could be transported to.

The Facility Director indicated following an allegation of sexual abuse in Lakewood Station's lockup, victim(s) would immediately be transported for emergency medical treatment. He indicated a forensic medical examination would be provided at Long Beach SART Center or Providence Company of Little Mary. In the PAQ, the facility indicated detainees are transported to Lakewood Regional Hospital or Los Angeles County Medical Center for a forensic medical examination. The audit team noted all of the facilities utilized are listed on the SART Center Roster. During the onsite audit, the facility reported one allegation of sexual abuse that occurred subsequent to completion of the PAQ. This investigation has not concluded. However, a review of the Incident Report and Supplemental Report indicated the facility documented its efforts to offer SAFEs and SANEs. The initial incident report indicated the victims were offered and declined a forensic medical examination. The facility is compliant with provision (c) of this standard.

115.121 (d)

The Agency PREA Coordinator confirmed detainee victims are transported for a forensic examination to an outside hospital. He indicated that if the hospital offers victim advocacy services, the detainee shall be permitted to use such services to the extent available, consistent with security needs. The facility is compliant with provision (d) of this standard.

115.121 (e)

The Agency conducts its own administrative and criminal investigations of sexual abuse. Therefore, provision (e) of this standard does not apply to Lakewood Station.

The facility is not compliant with provisions (a) and (b) of this standard. Corrective action is recommended. Recommended

Corrective Action as of October 14, 2022:

1. LASD shall develop, implement, and institutionalize a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. This protocol shall be 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.

2. LASD shall provide the audit team with the following documentation for review:

- Any additional departmental and/or unit level policy, procedures, and/or protocols detailing uniform evidence protocols and/or evidence collection protocols related to this standard;
- Lakewood Station’s Uniform Evidence Protocol;
- Lakewood Station’s Coordinated Response Protocol;
- LASD’s Criminal Investigations Course Curriculum; and
- LASD’s Sexual Assault Investigations Course Curriculum.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD provided the audit team with its “Manual of Policy and Procedures (MPP): Chapter 4 - Property and Evidence Procedures” on March 29, 2023, which it states serves as its uniform evidence protocol for sworn personnel. This manual does not appear to be consistent with the requirements of provision (b) of this standard. For example, the manual does not include the 120 hours timeframe for recovering DNA evidence in accordance with 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.” The audit team also met with members of LASD’s Scientific Services Bureau, who are responsible for analyzing evidence collected from crime scenes, including SART kits and other DNA evidence collected from PREA-related incidents. Scientific Services Bureau personnel can respond to and process crime scenes throughout Los Angeles County, including LASD lockups. Although it appears that the Scientific Services Bureau has clear protocols for collecting and analyzing evidence, the audit team found instances where the evidence was not analyzed within the required timeframes. In addition, the audit team reviewed PREA-related cases for which Scientific Services Bureau personnel were not called to the scene, and deputy personnel collected evidence. In one case reviewed by the audit team, body-worn camera footage shows deputy personnel collected evidence from multiple victims/suspects without changing their gloves, a practice that could result in cross-contamination of DNA evidence. Scientific Services Bureau Personnel indicated this is not in line with best practices for evidence handling. LASD informed the audit team that it plans to update its policy and procedures for evidence collection to be consistent with this standard and will update training curriculum and retrain staff in accordance with the updated protocols.
2. LASD provided the audit team with MPP, Chapter 4 - Property and Evidence Procedures as its proof of practice for this standard. The audit team did not receive Lakewood Station’s Coordinated Response Protocol, or any relevant course curriculum related to training of the uniform evidence protocol.

Additionally, during the audit team’s review of investigations, it became apparent that staff are not following the requirements for evidence collection in a uniform manner. For instance, in one investigation, responding deputies and the assigned detective investigator did not collect a reference DNA sample from the victim/suspect, resulting in LASD’s Scientific Services Bureau not completing a DNA analysis.

The Agency is not compliant with provisions (a) and (b) of this standard.

**115.122 Policies to ensure referrals of allegations for investigations**

**Auditor Overall Determination:** Does Not Meet Standard

**Auditor Discussion**

The following evidence was analyzed in making the compliance determination:

1. Lakewood Station’s PAQ Information
2. LASD, CDM, 3-04/025.15, PREA – Criminal and Administrative Investigations, Revised April 3, 2018
3. LASD, CDM, 8-03/060.00, PREA-Related Grievances, Revised July 15, 2016
4. LASD, MPP, Volume 4, Case Assignment and Reporting
5. Agency Head Designee Interview
6. Information from the Special Victims Bureau (SVB)

115.122 (a)

Lakewood Station indicated in the PAQ that the Agency ensures an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including detainee-on-detainee sexual abuse and staff sexual misconduct). The facility indicated there were zero allegations of sexual abuse and sexual harassment during the 12 months preceding the audit. The facility also indicated there were zero criminal and administrative investigations completed. However, during the onsite audit, the facility indicated there was one allegation of sexual abuse that occurred subsequent to completion of the PAQ. The criminal investigation into this allegation is ongoing.

CDM, 3-04/025.15, PREA – Criminal and Administrative Investigations, outlines criminal and administrative investigations. CDM, 8-03/060.00, PREA-Related Grievances, states inmate grievances involving allegations described in the Prison Rape Elimination Act (PREA) shall be thoroughly investigated. The Agency indicated this policy is currently being revised. It should be noted that Lakewood Station staff indicated they do not provide detainees with grievance forms at Lakewood Station. The facility should ensure forms are provided to detainees upon request.

The two policies provided for review related to this standard do not include

language mandating that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including detainee-on-detainee sexual abuse and staff sexual misconduct). It is recommended that LASD revise the policies to include such language.

The Agency Head Designee indicated an investigation is conducted for all allegations of sexual abuse or sexual harassment. He indicated inmate-on-inmate allegations of a criminal nature are referred to Custody Investigative Services Jail Investigation Unit (JIU) for investigation. The Agency Head Designee indicated MPP, Volume 4, Case Assignment and Reporting, is followed, and depending on the severity of the crime, an allegation may be assigned to Special Victims Bureau for investigation. He indicated staff-on-inmate allegations of sexual abuse or sexual harassment are referred to Internal Criminal Investigations Bureau (ICIB) or Internal Affairs Bureau (IAB) depending on the nature of the allegations. ICIB conducts criminal investigations and IAB conducts administrative investigations.

The audit team reviewed MPP, Volume 4, Case Assignment and Reporting. This policy outlines investigative case assignments by crime, listed in alphabetical order. Under "Prisoners", the policy indicates incidents occurring at any custody facility are assigned to JIU or appropriate Detective Bureau or Detail. Under "Rape/Sexual Assault", the policy indicates cases are assigned to SVB. SVB indicated they provide resources or guidance if requested because they have expertise but would never handle an investigation into allegations of sexual abuse or sexual harassment occurring in a custody facility. This policy is discussed in Standard 115.171 and revisions are suggested to provide clear guidance regarding assignments of criminal allegations of sexual abuse occurring in custody facilities, including inmate-on-inmate and staff-on-inmate allegations.

As stated above, the policies provided do not include language that mandate an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including detainee-on-detainee sexual abuse and staff sexual misconduct). Additionally, there are no completed investigative reports for PREA-related allegations from Lakewood Station to review. To determine agency investigative practices, the audit team requested investigative files. However, the audit team was not provided with requested investigative files for review. Therefore, a complete analysis could not be conducted by the audit team for this standard. Agency proof of practice is required to demonstrate compliance with provision (a) of this standard. The agency/facility did not demonstrate compliance with provision (a) of this standard.

#### 115.122 (b)

The Agency conducts its own administrative and criminal investigations of sexual abuse and sexual harassment in its lockups. Therefore, provision (b) of this standard does not apply to Lakewood Station.

#### 115.122 (c)-(d)

The auditor is not required to audit these provisions.

	<p>The Agency is not compliant with provision (a) of this standard. Corrective action is required.</p> <p>Corrective action:</p> <ol style="list-style-type: none"> <li>1. LASD shall provide any additional departmental policy that requires an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including detainee-on-detainee sexual abuse and staff sexual misconduct).</li> <li>2. LASD shall provide the audit team with proof of practice to demonstrate compliance with this standard. This shall include any requested allegation trackers and investigative files for criminal and administrative investigations into allegations of sexual abuse and sexual harassment occurring in custody facilities.</li> <li>3. The Agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</li> </ol> <p>Implemented Corrective Action as of April 12, 2023, and Final Reporting:</p> <ol style="list-style-type: none"> <li>1. During the corrective action period, LASD revised CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, and CDM, 8-03/060.00, PREA-Related Grievances and provided draft policies to the audit team for review. The revised policies are consistent with the requirements of provision (a) of this standard. However, LASD did not finalize, implement, and institutionalize the policies.</li> </ol> <p>The Agency is not compliant with provision (a) of this standard.</p>
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<b>115.131</b>	<b>Employee and volunteer training</b>
	<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. LASD, CDM, 3-04/025.50, PREA - Employee Training, Revised April 3, 2018</li> <li>3. LASD Prison Rape Elimination Act: Volunteer and Contractor Training Video</li> <li>4. Custody Training and Standards Bureau Sexual Assault/Abuse and Harassment Course Curriculum</li> <li>5. Employee and volunteer training records</li> <li>6. LASD Intranet Splash Page screenshot</li> <li>7. LASD Office of PREA Compliance Pre-Audit Guidebook for Random Staff, Dated August 3, 2022</li> </ol>



8. Random Staff Interviews

9. Volunteer Interviews

115.131 (a)-(b)

CDM, 3-04/025.50, PREA - Employee Training, states the Department shall provide PREA training to all employees who have contact with inmates. This policy also states that all current employees who have not received such training shall be trained within one year of the effective date of the PREA standards and shall receive refresher training every two years to ensure all employees know the Department's sexual abuse and sexual harassment policies and procedures. During years in which an employee does not receive training, updated information on sexual abuse and sexual harassment policies shall be provided, documented, and tracked by the Department member's concerned facility's training unit.

The LASD Prison Rape Elimination Act: Volunteer and Contractor Training Video was created by Just Detention International and LASD. The audit team reviewed the video and noted the video was developed to train volunteers and contractors. However, the video addresses staff throughout the video. The audit team noted the video includes training on topics required by provision (a) of this standard. During interviews with randomly selected staff, staff indicated confusion as to why they were shown a volunteer and contractor training video. It would be best practice to ensure training curriculum is tailored to the specific individual receiving the training. While the topics in the video address employee requirements, to avoid any confusion, it is recommended that the video is revised, or a new video is created and tailored to employees.

Custody Training and Standards Bureau Sexual Assault/Abuse and Harassment Course Curriculum was provided for review. This course is completed by Deputies and Custody Assistants during their academy training. The audit team reviewed the course curriculum and noted it includes topics required by provision (a) of this standard.

The audit team reviewed a random sample of Lakewood Station staff and volunteer training records and noted PREA training was implemented in August 2022, two weeks prior to the onsite audit. While Deputies and Custody Assistants receive PREA training during the academy, the audit team was not provided with academy training records and cannot determine when such training was received by Deputies and Custody Assistants assigned to Lakewood Station. Additionally, the audit team was not provided with any documentation related to refresher training for employees that may have received PREA training prior to August 2022.

Interviews with randomly selected staff and volunteers confirmed PREA training was newly implemented. Staff and volunteers interviewed indicated they viewed a PREA video in August 2022. Several staff brought a copy of the LASD Office of PREA Compliance Pre-Audit Guidebook for Random Staff to their interview. Staff indicated this guidebook was provided to assist them in preparing for the audit interview. The guidebook included the random staff interview questions and answers. Some staff

viewed the guidebook or asked if they could view the guidebook during the interview to provide responses to interview questions.

Lakewood station indicated in the PAQ that annual refresher training is conducted with all LASD staff. The facility indicated that between trainings, it provides staff and volunteers who may have contact with detainees with refresher information about current policies and procedures regarding sexual abuse and sexual harassment. The facility provided no additional information or documentation regarding refresher training. The facility also indicated that a monthly "splash page" refresher is provided to all LASD staff. The splash page appears when staff access LASD's intranet. The facility provided a screen shot of the splash page, which includes information regarding the Agency's zero-tolerance policy, information on how to report PREA violations, and a link to LASD's PREA resources on the Agency's intranet.

Institutionalization of practice is required to demonstrate compliance with PREA standards. Because the implementation of PREA training at Lakewood Station is recent, the practice is not yet institutionalized. The facility is not compliant with provisions (a) and (b) of this standard.

115.131 (c)

The employee and volunteer training records reviewed by the audit team did not include any acknowledgement forms signed by employees indicating they understood the training they received. The facility is not compliant with provision (c) of this standard.

The facility/agency is not compliant with all provisions of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall institutionalize PREA training which includes topics required by provision (a) of this standard. Training shall be provided to new staff and volunteers prior to having contact with detainees and/or inmate workers. LASD shall ensure staff understand the training they receive.
2. LASD shall develop and implement a training acknowledgement form for staff and volunteers to sign to acknowledge they received and understood PREA training. These records shall be provided to the audit team for review.
3. LASD shall provide annual refresher information to all staff who may have contact with detainees and/or inmate workers to ensure that they understand the Agency's current sexual abuse and sexual harassment policies and procedures.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD provided the audit team with an updated training video for employees, which includes topics required by provision (a) of this standard. The audit

	<p>team also received a list of newly hired volunteers for Lakewood Station. These volunteers currently have contact with detainees and/or inmate workers and have not received PREA training. The Agency did not demonstrate compliance with provision (a) of this standard.</p> <ol style="list-style-type: none"> <li>2. LASD implemented a PREA training roster that includes an acknowledgement of understanding. The audit team was provided with a copy of the acknowledgement form for review. The Agency demonstrated compliance with provision (c) of this standard.</li> <li>3. LASD made the updated training video and required acknowledgement of understanding an annual requirement in its Learning Management System (LMS) to ensure refresher training takes place for employees annually. Because volunteers are not included in LMS, it is the facility volunteer coordinator's responsibility to ensure volunteers receive annual refresher training each year. The Agency demonstrated compliance with provision (b) of this standard.</li> </ol> <p>The Agency is not compliant with provision (a) of this standard.</p>
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<b>115.132</b>	<b>Detainee, contractor, and inmate worker notification of the agency's zero-tolerance policy</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. LASD Zero Tolerance Posters</li> <li>3. Detainee Booking Packets</li> <li>4. LASD Station Jail Orientation Form (SH-R-449), Revised May 2022</li> <li>5. LASD PREA Comprehensive Inmate Education Acknowledgment Form (SH-J-632), Revised February 2021</li> <li>6. LASD PREA Zero Tolerance Pamphlet (SH-J-478)</li> <li>7. LASD Prison Rape Elimination Act: Volunteer and Contractor Training Video</li> <li>8. Lakewood Station contractor training records</li> <li>9. Detainee Interviews</li> <li>10. Contractor Interviews</li> <li>11. Inmate Worker Interviews</li> <li>12. Observations made during the site review and informal discussions with staff</li> </ol> <p>115.32 (a)</p> <p>The facility indicated in the PAQ that during the intake process, staff notify all detainees of the Agency's zero-tolerance policy regarding sexual abuse and sexual</p>

harassment. The facility also indicated that of detainees admitted during the past 12 months, 1,824 were given this information at intake.

Although the facility provided no policies for review related to this standard, CDM, 03-04/025.40, PREA – Inmate Education, states the Department shall provide inmate education in formats accessible to all inmates including those who are LEP, deaf, visually impaired or otherwise disabled, as well as those who have limited reading skills.

The Station Jail Orientation Form and the PREA Zero Tolerance Pamphlet include information regarding the Agency's zero-tolerance policy and how to report allegations of sexual abuse. The facility provided the audit team with the PREA Zero Tolerance Pamphlet and the PREA Comprehensive Inmate Education Acknowledgement Form in 10 different languages. However, during the site review and informal conversations with staff, it was noted that staff were only aware of versions in English in Spanish and did not know how to obtain information in other formats that can be understood by detainees who are LEP, deaf, visually impaired, disabled, mentally ill, or have limited reading skills.

During the site review, the audit team noted PREA Zero Tolerance Posters in English and Spanish in the intake area and throughout the lockup. These posters include information regarding how to report allegations of sexual abuse and sexual harassment. The audit team observed the intake process and noted detainees are provided with or shown the PREA Zero Tolerance Pamphlet and the Station Jail Orientation Form. However, the audit team noted there is not a consistent practice of providing detainees with a verbal explanation of the information. Additionally, not all staff provided detainees with a copy of the information. The audit team also noted staff only provided PREA information in English and Spanish. Staff indicated during informal conversations that they only recently began providing detainees with information regarding PREA. Staff indicated PREA information is provided in English and Spanish only.

The audit team interviewed and reviewed booking packets for 10 detainees and noted all 10 detainees signed an acknowledgement that they received the jail orientation information. Additionally, all 10 detainees signed a PREA Comprehensive Inmate Education Acknowledgement Form indicating they received and understand the Agency's zero-tolerance policy. During interviews with these 10 detainees, a majority indicated they were provided with information regarding the Agency's zero-tolerance policy during the booking process. However, some of these detainees indicated staff did not go over the information. Some detainees indicated they did not receive the information and did not understand what they were signing during the booking process. One of these detainees was LEP and indicated an interpreter and information in a format he could understand was not provided. The staff that processed this detainee during booking indicated they have never needed to utilize an interpreter and were unaware of PREA information in languages other than English or Spanish. We requested booking packets for a detainees booked at Lakewood station for randomly selected dates in the 12 months preceding the onsite audit. However, the audit team was not provided with this information.

During interviews, intake staff indicated that information about the Agency's zero-tolerance policy regarding sexual abuse and sexual harassment is provided to detainees during the booking process. Intake staff confirmed PREA information is only provided in English or Spanish. Intake staff did not know how to obtain information in other formats that can be understood by detainees who are LEP, deaf, visually impaired, disabled, developmentally delayed, mentally ill, or have limited reading skills. The facility did not demonstrate compliance with provision (a) of this standard.

115.132 (b)

The facility indicated in the PAQ that contractors and any inmates who work in the facility are informed of the Agency's zero-tolerance policy regarding sexual abuse and sexual harassment upon entering the facility.

The LASD Prison Rape Elimination Act: Volunteer and Contractor Training Video was created by Just Detention International and LASD. The audit team reviewed the video and noted the video was developed to train volunteers and contractors. However, the video addresses staff throughout the video. The audit team noted the video includes information regarding the Agency's zero-tolerance policy regarding sexual abuse and sexual harassment.

Interviews with two randomly selected contractors indicated they received PREA training in August 2022, two weeks prior to the onsite audit. During interviews, each contractor indicated they were informed about the Agency's zero tolerance policy and demonstrated an understanding of the information. The audit team reviewed Lakewood Station training records and confirmed both contractors, along with other contractors, attended PREA training. This training consisted of watching the LASD Prison Rape Elimination Act: Volunteer and Contractor Training Video. However, the audit team was not provided with any documentation indicating contractors acknowledged receiving and understanding the zero-tolerance policy.

One randomly selected inmate worker was interviewed. The inmate worker indicated they were informed about the Agency's zero-tolerance policy and demonstrated an understanding of this information. They indicated they were recently shown a video on sexual safety in confinement. However, the facility did not provide any documentation regarding inmate worker notification of the Agency's zero-tolerance policy, or any acknowledgements signed by inmate workers indicated they received and understand the Agency's zero-tolerance policy.

To demonstrate compliance with PREA standards, practices must be institutionalized. Therefore, because contractors were trained very recently, the practice of informing contractors of the Agency's zero-tolerance policy is not yet institutionalized. The facility did not demonstrate compliance with provision (b) of this standard.

The facility is not compliant with all provisions of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall institutionalize the practice of notifying all detainees, contractors, and inmate workers of the Agency's zero-tolerance policy regarding sexual abuse and sexual harassment. LASD shall ensure this information is provided to detainees in a manner they can understand. Information shall be provided in formats that can be understood by detainees who are LEP, deaf, visually impaired, disabled, developmentally delayed, mentally ill, or have limited reading skills.
2. LASD shall train staff on policy, procedure, and resources available for communicating with detainees who are LEP, deaf, visually impaired, disabled, developmentally delayed, mentally ill, or have limited reading skills. LASD shall provide the audit team with proof that such training was provided.
3. LASD shall ensure all detainees, contractors, and inmate workers sign an acknowledgement indicating they received and understand the Agency's zero-tolerance policy.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD provided the audit team with a Jail Staff Briefing regarding Translation/ Interpretation of PREA Inmate Educational Materials, and additional tools that staff may utilize to ensure detainees who are LEP, deaf, visually impaired, disabled, developmentally delayed, mentally ill, or have limited reading skills are notified of the Agency's zero-tolerance policy. LASD will need to finalize, implement, retrain, and institutionalize this practice of notifying all detainees of the Agency's zero-tolerance policy. The audit team also received a list of newly hired contractors for Lakewood Station who are scheduled to receive PREA training. Lakewood Station staff provided the audit team with documentation that inmate-workers are notified and sign an acknowledgment of understanding the Agency's zero-tolerance policy upon arrival to work in the lockup. The Agency did not demonstrate compliance with provision (a) of this standard.
2. LASD has not trained Lakewood Station staff on how to ensure detainees who are LEP, deaf or hard of hearing, blind or have low vision, or have intellectual, psychiatric, or speech disabilities, are notified of the Agency's zero-tolerance policy. The Agency did not demonstrate compliance with provision (a) of this standard.
3. As stated above, Lakewood Station staff provided the audit team with documentation that inmate-workers are notified and sign an acknowledgment of understanding the Agency's zero-tolerance policy upon arrival to work in the lockup. The Agency has demonstrated compliance with provision (b) of this standard.

The Agency is not compliant with provision (a) of this standard.

**115.134 Specialized training: Investigations**

**Auditor Overall Determination:** Does Not Meet Standard

**Auditor Discussion**

The following evidence was analyzed in making the compliance determination:

1. Lakewood Station’s PAQ Information
2. LASD, CDM, 3-04/025.50 PREA - Employee Training, Revised April 3, 2018
3. LASD, Criminal Investigations, CCN 31410, Expanded Course Outline
4. LASD, Sexual Assault Investigations, CCN 33435, Expanded Course Outline
5. List of Deputy Academy Learning Domains
6. National Institute of Corrections (NIC) PREA Investigating Sexual Abuse in a Confinement Setting Course curriculum
7. Investigative Staff Training Records
8. Investigative Staff Interviews

115.134 (a)-(c)

The facility indicated in the PAQ that Agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

CDM, 3-04/025.50, PREA - Employee Training, states the Department shall provide PREA training to all employees who have contact with inmates. In addition to the general training provided to all employees, this policy requires that investigating deputies shall receive specialized training. The training shall include at minimum all training topics required under the PREA standards.

The Agency provided expanded course outlines for LASD’s Criminal Investigations Course and Sexual Assault Investigations and list of Deputy Academy Learning Domains. According to the Agency PREA Coordinator, all deputy sheriffs attend the LASD academy and complete the LASD Criminal Investigations course in addition to the regular learning domains. The Agency PREA Coordinator also indicated the Sexual Assault Investigations course is a 40-hour advanced course for investigators that meets the specialized training requirement. The audit team reviewed the list of learning domains and expanded course outlines and was unable to determine if the courses included topics required by this standard, including:

- Techniques for interviewing sexual abuse victims, which includes training about the impact of trauma on a victim’s memory and ability to communicate about the event.
- Proper use of Miranda and Garrity warnings, which are warnings that are designed to allow people in criminal or administrative investigations to be silent and are necessary to ensure that any information gathered during an interview is admissible in court should there be a prosecution that arises from the incident.
- Sexual abuse evidence collection in confinement settings, which includes

how to preserve evidence in a confinement setting, and the challenges to doing so that are particular to the kind of evidence of sexual abuse that exists in a confinement setting.

- The criteria and evidence required to substantiate a case for administrative action or prosecution referral.

The audit team reviewed the NIC PREA Investigating Sexual Abuse in a Confinement Setting Course curriculum and noted the course includes topics required by this standard.

The audit team reviewed training records for five Agency investigative staff: one that conducts criminal investigations of inmate-on-inmate sexual abuse, two that conduct criminal investigations of staff-on-inmate allegations of sexual abuse, and two that conduct administrative investigations of PREA related incidents. All five investigative staff received general PREA training provided to all employees. The investigator that conducts criminal investigations of inmate-on-inmate sexual abuse completed the NIC PREA Investigative Sexual Abuse in a Confinement Setting Course. The audit team was unable to determine if the remaining four have completed specialized training that meets the requirements of this standard. The audit team will need to review additional training records and course materials in order to determine if the remaining four investigative staff interviewed have completed training that meets the requirements of this standard. Additionally, the audit team was not provided with requested investigative files. Therefore, the audit team could not confirm who conducts PREA-related investigations. The Agency did not demonstrate compliance with provisions (a)-(c) of this standard.

The Agency is not compliant with all provisions of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall ensure that all staff who conduct sexual abuse investigations receive specialized training for conducting sexual abuse investigations in a confinement setting. This training shall include the topics required by this standard. This training shall be in addition to general PREA training which is required by §115.131 of the PREA standards.
2. LASD shall maintain documentation that Agency investigative staff have completed the required specialized training in conducting sexual abuse investigations.
3. LASD shall provide the audit team with any requested investigative files for review. These files are required to determine who conducts PREA related investigations and determine if they have completed specialized training required by this standard.
4. LASD shall provide the audit team with additional training records and course materials in order to demonstrate that the Agency's investigative staff have completed training that meets the requirements of this standard. This shall include course materials for LASD's Deputy Academy and Criminal



Investigations, and Sexual Assault Investigations Courses and any additional training records required to demonstrate compliance.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD indicated it has initiated NIC PREA Investigating Sexual Abuse in a Confinement Setting Training for all investigators that conduct criminal and administrative investigations of PREA-related incidents. LASD provided the audit team with a draft LASD Sworn Personnel Briefing regarding a Garrity Advisement that it plans to provide to staff upon approval. LASD has not trained or institutionalized the specialized training for investigators. The Agency did not demonstrate compliance with provisions (a) and (b) of this standard.
2. LASD indicated that operations staff in the three units that investigate PREA-related incidents will maintain the training records once staff complete the required specialized training. However, LASD has not provided proof of practice and did not finalize, implement, retrain, and institutionalize this practice. The Agency did not demonstrate compliance with provision (c) of this standard.
3. LASD provided the audit team with requested investigative files during the corrective action period. The audit team determined that responding deputies conducted initial investigations. These deputies have not received specialized training for conducting sexual abuse investigations in a confinement setting that is consistent with the requirements of this standard. LASD currently has two investigators that have completed specialized training consistent with the requirements of this standard. LASD should ensure only qualified investigators that have received specialized training consistent with the requirements of this standard conduct investigations into PREA-related incidents.
4. The audit team attended employee PREA training at LASD's Deputy Academy and Jail Operations Academy to determine if the training provided is consistent with the requirements of provision (b) of this standard. The audit team noted the training does not include proper use of Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The Agency did not demonstrate compliance with provision (b) of this standard.

The Agency is not compliant with all provisions of this standard.

<b>115.141</b>	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>

The following evidence was analyzed in making the compliance determination:

1. Lakewood Station's PAQ Information
2. LASD, CDM, 6-04/020.00, Station Jail Inmate Classification Questionnaire, Revised March 5, 2018
3. LASD, CDM 6-02/030.00, Jailer, Revised January 10, 2020
4. Station Jail Inmate Classification Questionnaire, Revised December 2011
5. Los Angeles County Unified Arrestee Medical Screening Form, Revised April 2020
6. 9-Line Booking Form
7. Specialized Staff Interviews - Staff who perform screening for risk of victimization and abusiveness
8. Random Staff Interviews
9. Detainee Interviews
10. Observations made during the site review and informal discussions with staff

115.141(a)

This provision is not applicable because the facility houses detainees overnight.

115.141(b)-(d)

According to the information provided by Lakewood Station in the PAQ, in the past 12 months, 1,824 detainees were screened for risk of sexual victimization or risk of sexually abusing other detainees. The current intake assessment consists of questions from multiple screening instruments, including the 9-Line Booking Form, Station Jail Inmate Classification Questionnaire, and the Los Angeles County Unified Arrestee Medical Screening Form.

The 9-Line Booking Form includes basic identifying information, including name, date of birth, charges, height, and weight. The Station Jail Inmate Classification Questionnaire uses a point system that assigns points related to charges, current behavior, gang affiliation, whether the detainee is a member of the LGBT community, whether the detainee cannot be housed with anyone or in the general population, and other miscellaneous classification criteria to determine housing. CDM, 6-04/020.00, Station Jail Inmate Classification Questionnaire, delineates requirements for classifying and segregating detainees, in addition to instructing jailers on how to utilize the questionnaire to determine housing. However, the policy does not mention sexual safety, nor does it provide guidance on how jailers should utilize the information collected through the questionnaire to screen and assess the risk of being sexually abused by other detainees or sexually abusive toward other detainees. Post on-site review, the audit team was provided with CDM 6-02/030.00, Jailer, which describes the duties and responsibilities of the jailers at station jails. This policy also does not reference sexual safety or the mandate to screen detainees for PREA-related risk factors prior to making housing determinations.

During the site review, the audit team was provided with the Los Angeles County Unified Arrestee Medical Screening Form, which is typically completed by arresting

deputies, but can also be completed by the jailer. The form includes questions that the arresting deputy and jailer must complete based on observations of the detainee. These questions include whether the detainee has a mental, physical, or developmental disability, the detainee's behavior, and other medical and mental-health-related questions. The audit team observed several bookings by different arresting deputies. However, the audit team was unable to observe the completion of the medical screening since arresting deputies stated that they complete this form in the patrol car in route to the station.

During staff interviews and informal discussions with jailers, it became evident to the audit team that each jailer utilizes the collected data differently. Some stated that they use the data to determine housing but not necessarily to determine risk of sexual victimization. Others stated that they do not utilize some of the data collected such as information pertaining to the detainees age or physical build.

The audit team reviewed the booking files for each detainee interviewed by the audit team during the onsite review and determined that the three documents that collect the data required by this standard were included in each file. However, in 3 of the 11 files reviewed, the Station Jail Inmate Classification Questionnaire questions were either not asked, not documented, or completed by staff without input from the detainee regarding their own perception of vulnerability. The audit team also requested booking files for detainees arrested on October 15, 2021, and May 30, 2022, to ensure the questions were being asked and the information was being documented. However, these booking files were not provided.

Each of the screening instruments gather pertinent information such as whether the detainee has a mental, physical, or developmental disability, the age of the detainee, the physical build and appearance of the detainee, whether the detainee has previously been incarcerated, the nature of the detainee's alleged offense and criminal history, and the detainee's own perception of their vulnerability. However, use of the information obtained during screening of the detainee for risk of sexual victimization or risk of sexually abusing other detainees is not institutionalized and is not consistently used to make housing determinations.

The facility is not compliant with provision (b), (c), or (d) of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall ensure Lakewood Station staff utilize the information obtained from the risk screening pursuant to Standard 115.141 to assess risk of sexual abuse or abusiveness.
2. LASD shall ensure lockup staff who make housing determinations are trained on how to utilize the information obtained through screening to assess risk of sexual abuse or abusiveness and to make individualized determinations about safety for each detainee. LASD shall provide the audit team with proof that such training is provided.

	<p>Implemented Corrective Action as of April 12, 2023, and Final Reporting:</p> <ol style="list-style-type: none"> <li>1. LASD provided the audit team with a Jail Staff Briefing regarding Inmate Classification Questionnaire and a draft of a revised Station Jail Inmate Classification Questionnaire that are consistent with provisions (b), (c), and (d) of this standard. However, LASD did not finalize, implement, retrain, or institutionalize the revised risk screening instrument.</li> <li>2. On April 11, 2023, during the site visit, the audit team reviewed six booking files of detainees and observed the three documents used to obtain risk screening information. However, LASD has not retrained Lakewood Station staff on how to utilize the information obtained through screening to assess risk of sexual abuse or abusiveness and to make individualized determinations about safety for each detainee.</li> </ol> <p>The Agency is not compliant with provisions (b), (c), and (d) of this standard.</p>
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<b>115.151</b>	<b>Detainee reporting</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. LASD, CDM, 3-04/025.40, PREA – Inmate Education, Revised April 3, 2018</li> <li>3. LASD, CDM, 3-04/025.50, PREA – Employee Training, Revised April 3, 2018</li> <li>4. LASD, CDM, 4-01/000.00, Crime Reporting Procedures, Revised December 8, 2021</li> <li>5. LASD, CDM, 6-03/010.00, Booking and Property Record Form (SH-J-293), Revised May 31, 2022</li> <li>6. LASD, MPP, 3-02/290.10, Specific Guidelines, Revised August 11, 2017</li> <li>7. LASD PREA Zero Tolerance Posters</li> <li>8. LASD PREA Zero Tolerance Pamphlet (SH-J-478)</li> <li>9. LASD PREA Comprehensive Inmate Education Acknowledgment Form (SH-J-632), Revised February 2021</li> <li>10. LASD Station Jail Orientation Form (SH-R-449), Revised May 2022</li> <li>11. Los Angeles Regional Crime Stoppers Participation Agreement with the Los Angeles County Sheriff’s Department, Dated July 14, 2022</li> <li>12. A Guide Through Custody – Los Angeles County Jail, SH-J-447, Revised November 2020</li> <li>13. Pre-Audit Guidebook for Random Staff, Dated August 3, 2022</li> <li>14. PREA Coordinator Interview</li> <li>15. Random Staff Interviews</li> <li>16. Detainee Interviews</li> </ol>

115.151 (a)

According to the information provided in Lakewood Station's PAQ, the Agency reports that it has established procedures allowing for multiple internal ways for detainees to privately report sexual abuse, sexual harassment, and retaliation by other detainees or staff. This information is provided to detainees through various means.

Under CDM 6-03/010.00, Booking and Property Record Form (SH-J-293), the booking packet is required to include the PREA Zero Tolerance Pamphlet, the Station Jail Orientation Form, and the PREA Comprehensive Inmate Education Acknowledgment Form. This policy was last revised on May 31, 2022. Prior to this revision, the booking packet was not required to include the PREA Zero Tolerance Pamphlet, the Station Jail Orientation Form, or the PREA Comprehensive Inmate Education Acknowledgment Form.

The PREA Zero Tolerance Pamphlet provides that detainees may report sexual abuse or sexual harassment by:

- Calling Los Angeles Crime Stoppers' reporting hotline by dialing \*21;
- Telling any person who works or volunteers at the station;
- Filling out an inmate request or grievance form; or
- Telling someone outside the facility or family members who can report to Los Angeles Crime Stoppers at (800) 222-8477.

The Station Jail Orientation Form provides that detainees may report sexual assault or sexual abuse by:

- Notifying Sheriff's Department personnel;
- Filling out a confidential Inmate Grievance Form; or
- Dialing \*21 from a County facility phone.

The PREA Comprehensive Inmate Education Acknowledgment Form provides that detainees may report sexual abuse, sexual harassment, and retaliation by staff or other detainees by:

- Telling any person who work or volunteers at the station;
- Submitting a written grievance;
- Submitting a written medical request form;
- Calling Los Angeles Crime Stoppers at (800) 222-8477 or dialing \*21 from any inmate phone; or
- Asking a family member or friend to report on behalf of the detainee.

During the site review, the audit team observed LASD PREA Zero Tolerance Posters in English and Spanish in the intake area and throughout the lockup. The posters provide the following information for detainees on "How to Report" allegations of sexual abuse and sexual harassment:

- Report to any staff, volunteer, contractor, or medical or mental health staff
- Call the LARCS by dialing \*21
- Tell family, friend, or the OIG
- Submit an inmate medical request form
- Submit a confidential request/Grievance Form

As discussed under provision 115.32 (a), the audit team observed the intake process and noted detainees are shown the PREA Zero Tolerance Pamphlet, the Station Jail Orientation Form, and the PREA Comprehensive Inmate Education Acknowledgment Form. The audit team also observed that some detainees received copies of the PREA documentation while others did not. In addition, the audit team noted there is not a consistent practice of providing detainees with a verbal explanation of the information, including the multiple internal ways for detainees to report sexual abuse, sexual harassment, and retaliation. As such, detainees may not understand or know what information is available to them.

During the onsite review, the audit team interviewed 10 detainees regarding their understanding of how to make reports of sexual abuse, sexual harassment, and retaliation and received mixed responses. Of the 10 detainees interviewed, 5 conveyed a few different ways in which to privately report sexual abuse, sexual harassment, and retaliation. Some indicated that they would feel comfortable reporting to a deputy or a family member. The remaining five detainees indicated that they did not know how to privately report an incident sexual abuse, sexual harassment, or retaliation. One detainee reported that the booking process was rushed and that they were not aware of what was signed. The detainee reported that they were not provided with a copy of the documentation that was signed nor was the information explained to them during the booking process.

CDM, 3-04/025.50, PREA - Employee Training, provides that the Department shall provide PREA training to all employees who have contact with inmates. Despite staff referring to the Pre-Audit Guidebook that was provided to them in preparation for the audit, the audit team verified that staff and volunteers conveyed an understanding of the requirement to report sexual abuse, sexual harassment, and retaliation immediately. Interviewed staff could name at least one way to report abuse. Most random staff referred to the information provided in the PREA Zero Tolerance Posters in the station jail for the ways to report sexual abuse, including how to privately report an incident to Los Angeles Regional Crime Stoppers (Crime Stoppers). The audit team visited all housing areas in the station jail during the onsite review and noted that the PREA Zero Tolerance Posters informing detainees on ways in which to report abuse were posted throughout the station jail in English and Spanish, including near the telephones.

Contrary to the information provided in the PREA Zero Tolerance Pamphlet, the Station Jail Orientation Form, and the PREA Comprehensive Inmate Education Acknowledgment Form, interviews with staff indicated that detainees at the Lakewood Station lockup are not provided with grievance or medical request forms. In addition, staff indicated that they do not provide detainees with pencils or other

writing utensils under any circumstance due to safety concerns. As a result, detainees are unable to submit a written report of sexual abuse, sexual harassment, or retaliation, whether it be through a written grievances or medical request forms.

Lastly, none of the documentation provided by LASD that apply to detainees in the lockup indicate ways in which detainees can privately report staff neglect or violation of responsibilities that may have contributed to incidents of sexual abuse, sexual harassment, or retaliation. While LASD did provide the "A Guide Through Custody - Los Angeles County Jail" packet that does note the ability to report staff neglect or violation of responsibilities which may have contributed to incidents of sexual abuse and/or sexual harassment, this packet is not provided to detainees in the station lockups. Inmates are provided this packet upon entering LASD's IRC. The Agency did not demonstrate compliance with this provision (a) of this standard.

#### 115.151 (b)

The PREA Zero Tolerance Pamphlet, the Station Jail Orientation Form, and the PREA Comprehensive Inmate Education Acknowledgment Form all inform the detainees of their ability to report sexual abuse or sexual harassment to Crime Stoppers, an entity that is not a part of LASD. Pursuant to the Crime Stoppers Participation Agreement with LASD, Crime Stoppers operates a system through which members of the community can submit completely anonymous crime tips via the toll-free telephone number (as well as text messaging and email). The Participation Agreement further provides that all tips received by Crime Stoppers will be forwarded to the pre-designated contacts within the Agency.

The audit team tested two detainee telephones located in the lockup to ensure that calls can be made to Crime Stoppers. The audit team dialed \*21 from both detainee telephones and one phone in the station lobby. Auditors managed to successfully file a test report with Crime Stoppers that was received and immediately forwarded to the Agency PREA Coordinator. The Agency PREA Coordinator confirmed that he receives an email within 24 hours of the call and that the caller can remain anonymous. The telephone system did not require a pin number to reach Crime Stoppers. The audit team notes that during one of the test calls, the auditor had to speak loudly for the operator to hear what was being said, which could present issues with the anonymity of these calls. Lakewood Station should work to resolve this issue.

The audit team was unable to verify whether calls to Crime Stoppers from the lockup telephones are monitored and/or recorded. The Agency PREA Coordinator provided the audit team with LASD's contact from Global Tel Link (GTL), the telecommunication company that operates the telephones, to request additional information. The audit team emailed the representative but has not received a response. This information is required to demonstrate compliance with provision (b) of this standard.

#### 115.151 (c)

CDM, 4-01/000.00, Crime Reporting Procedures, provides that custody personnel

shall immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment involving an inmate, whether made verbally or in writing, including third-party and anonymous reports (regardless of whether the alleged incident occurred at another facility or agency) to their immediate supervisors and complete the necessary report(s). This policy also requires that staff immediately report any knowledge of retaliation against inmates or staff who have reported an incident of sexual abuse or sexual harassment involving an inmate. MPP, 3-02/290.10, Specific Guidelines, provides that all deferred crime and arrest reports shall be approved by the watch sergeant and that the deputy personnel shall complete a deferred report by the end of shift the next day. A report may be deferred for the following types of incidents:

- No workable information;
- Misdemeanor field releases;
- Misdemeanor non-desirous Felony, no workable information;
- Traffic collision with no injuries;
- Traffic collisions with minor injuries and no follow-up; or
- Any report that the watch sergeant or watch commander approved to be deferred

During interviews, staff conveyed an understanding of the requirement to accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. In addition, most staff understood the requirement to document verbal reports of sexual abuse, sexual harassment, and retaliation immediately. Some staff stated that they would immediately report any verbal reports of sexual abuse, harassment, and retaliation to a supervisor immediately, and that the supervisor would be responsible for documenting the report promptly. However, as discussed above, Lakewood Station does not provide detainees with the means to submit written reports since the station does not provide detainees with writing instruments, grievances forms, or medical request forms. As such, staff are unable to accept written reports of sexual abuse and sexual harassment as required by this provision. Therefore, the Lakewood Station does not meet provision (c) of this standard.

115.151 (d)

Lakewood Station indicated in the PAQ that the Agency has established procedures for staff to privately report sexual abuse and sexual harassment of detainees. The facility indicated that staff are informed of these procedures through PREA training and the Agency's intranet "splash page."

CDM, 4-01/000.00, Crime Reporting Procedures, provides that if Department members would like to privately report an incident of sexual abuse or harassment of an inmate, they shall report it to the on-duty watch commander. CDM, 3-04/025.50, PREA - Employee Training, states that all employees who have contact with inmates shall be provided with PREA training.

The audit team was provided with a screenshot of the Agency's intranet splash



page. The splash page indicated the following ways to report PREA violations:

- Advise your supervisor;
- Call the Internal Affairs Bureau tip line at 800-698-8255;
- Call LA Crime Stoppers at 800-222-8477; and
- Go to [www.LaCrimeStoppers.org](http://www.LaCrimeStoppers.org).

The splash page also provides staff with a link to LASD's PREA Resources page on the intranet.

All random staff were provided with a "Pre-Audit Guidebook" in preparation of the PREA audit. The audit team reviewed this guidebook and noted it provides that staff may refer to the splash screen for information on how to report.

Interviewed staff were aware of at least one method in which to privately report sexual abuse and sexual harassment of detainees. Staff indicated that the PREA training video, the Pre-Audit Guidebooks, and/or the splash page provide that staff may privately report incidents of sexual abuse or harassment of an inmate to LASD's Internal Affairs Bureau Tip Line or Crime Stoppers.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall establish procedures on and inform detainees of ways in which detainees can privately report staff neglect or violation of responsibilities that may have contributed to incidents of sexual abuse, sexual harassment, or retaliation.
2. LASD staff shall accept reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports. As such, Lakewood Station staff shall be required to provide detainees in lockups with any requested forms (i.e., inmate request form, grievance form, medical request form) and writing instruments to ensure that detainees may privately submit written reports of sexual abuse, sexual harassment, retaliation by other inmates or staff, and staff neglect or violation of responsibilities that may have contributed to incidents of sexual abuse, sexual harassment, or retaliation. LASD shall train staff on how to accept reports made in writing. LASD shall provide the audit team with proof such training has been provided.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. On March 31, 2023, LASD provided the audit team with a draft copy of the revised PREA Comprehensive Inmate Education Form. It includes the following language, "[y]ou have the right to report staff neglect or a violation of staff's responsibilities that contributed to sexual abuse or sexual harassment." Detainees receive a tangible copy of this document upon being booked. The revised language is consistent with the requirements of provision (a) of this standard. However, LASD did not finalize, implement, or

	<p>institutionalize the revised form.</p> <ol style="list-style-type: none"> <li>2. LASD also provided the audit team with a revised draft copy of the Zero Tolerance Poster on March 31, 2023. LASD added language to the poster that includes, “[r]eport staff neglect or a violation of staff responsibilities that contributed to sexual abuse or sexual harassment against inmates of the Los Angeles County Jails.” On April 11, 2023, the audit team conducted a site visit at Lakewood Station and confirmed that the revised PREA Comprehensive Inmate Education Form and PREA Zero Tolerance Poster were not utilized. LASD did not finalize, implement, or institutionalize the revised PREA Zero Tolerance Poster.</li> <li>3. The audit team verified with GTL that calls to Crime Stoppers from the lockup are not monitored and/or recorded. The Agency is compliant with provision (b) of this standard.</li> <li>4. During the site visit to Lakewood Station on April 11, 2023, the audit team confirmed that detainees now have access to inmate request forms, grievance forms, and writing instruments, upon request to personnel. Medical request forms are not available to detainees because the station jail does not provide medical services. If a detainee complains of a medical issue, personnel will transport them to the hospital to ensure the detainee is okay to book. However, LASD did not provide any additional training to personnel on how to accept reports in writing.</li> </ol> <p>The Agency is not compliant with provisions (a) and (c) of this standard.</p>
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<b>115.154</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. LASD PREA Zero Tolerance Posters</li> <li>3. Los Angeles County Sheriff’s Department Website – Prison Rape Elimination Act (<a href="https://lasd.org/custody/#prea">https://lasd.org/custody/#prea</a>)</li> <li>4. Observations made during the on-site review</li> <li>5. 115.154 (a)</li> </ol> <p>According to the information provided by Lakewood Station in the PAQ, the Agency reports that it has established methods to receive third-party reports of sexual abuse and sexual harassment in its lockups from the Crime Stoppers, the Los Angeles County Office of Inspector General (OIG), and the American Civil Liberties</p>

Union (ACLU). The Agency also reports that it publicly distributes information on how third parties can report detainee sexual abuse or sexual harassment on LASD's Website at the following url: <https://lasd.org/custody/#prea>.

During the site review, the audit team observed LASD PREA Zero Tolerance Posters in English and Spanish in the intake area, throughout the lockup, and in the lobby of the station with information on "How to Report" allegations of sexual abuse and sexual harassment. The posters list five ways to report allegations of sexual abuse and harassment. Of the five ways, the following three pertain to third-party reporting:

- Reporting to any staff, volunteer, contractor, or medical or mental health staff;
- Calling the LARCS at 800-222-8477; or
- Telling family, friend, or the OIG.

Lakewood Station staff and volunteers conveyed an understanding of the requirement to report sexual abuse and sexual harassment immediately, whether the report was made verbally, in writing, anonymously, or from a third party. Depending on whether staff were law enforcement or non-law enforcement, they would either document the report and initiate a response or notify a supervisor who would be responsible for documenting the report and initiating a response. Contrary to the information provided on the poster, Lakewood Station does not staff medical and mental health providers.

As discussed under Standard 115.151, Crime Stoppers operates a system through which members of the community can submit completely anonymous crime tips via the toll-free telephone number (as well as text messaging and email). The Participation Agreement provides that all tips received by Crime Stoppers will be forwarded to the predesignated contacts within the Agency. In addition to testing the detainee telephones located in the lockup to ensure that reports of sexual abuse and/or sexual harassment can be made to Crime Stoppers by dialing \*21, the audit team also submitted a test report to Crime Stoppers via the toll-free number listed on the poster from the telephone located in the Lakewood Station's lobby. The test report was successfully received by Crime Stoppers and immediately forwarded to LASD's PREA Coordinator.

As the oversight entity for LASD, the OIG accepts complaints from detainees, inmates, members of the public, community organizations and other County agencies. This includes any and all allegations of sexual abuse, sexual harassment, retaliation, and staff neglect or violation of responsibilities that may have contributed to such incidents. Each complaint is reviewed by OIG staff and forwarded to the appropriate facility or station for proper handling. If the complaint alleges sexual abuse and/or sexual harassment, the OIG also submits the complaint to LASD's PREA Coordinator. Furthermore, the audit team, which is comprised of OIG staff, is apprised of the ACLU's complaint process and notes that complaints received by the ACLU, including allegations of sexual abuse and/or sexual

	<p>harassment, are also forwarded to LASD for proper handling.</p> <p>LASD’s Custody Operations website has a section dedicated to providing PREA information to the public. In addition to providing general information about PREA, the website also provides that reports of sexual abuse and sexual harassment can be made by inmates, friends or family of inmates, attorneys, community members, or anyone who suspects or witnesses sexual abuse or sexual harassment. The website states that the public can report sexual abuse or sexual harassment to any LASD staff member, contractor, or volunteer, and that they would be required to report the allegation to the unit administration in accordance with Department policies. Furthermore, the website states that the public can report to Crime Stoppers via the toll-free telephone number or email, both of which are listed, or by contacting LASD’s PREA Coordinator by emailing <a href="mailto:prea-coordinator@lasd.org">prea-coordinator@lasd.org</a>. The audit team sent a test message to the PREA Coordinator email address listed on the website and received confirmation that message was received. The agency demonstrated compliance with this standard.</p>
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<b>115.161</b>	<b>Staff and agency reporting duties</b>
	<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p> <p><b>Auditor Discussion</b></p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. LASD, CDM, 4-01/000.00, Crime Reporting Procedures: Notification of Sexual Abuse or Sexual Harassment Involving an Inmate, Revised December 8, 2021</li> <li>3. Agency PREA Coordinator Interview</li> <li>4. Facility Director Interview</li> <li>5. Random Staff Interviews</li> <li>6. Informal discussions with staff during the site review</li> </ol> <p>115.161 (a)</p> <p>CDM, 4-01/000.00, Crime Reporting Procedures: Notification of Sexual Abuse or Sexual Harassment Involving an Inmate, states that staff shall immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment involving an inmate, whether made verbally or in writing, including third-party and anonymous reports (regardless of whether the alleged incident occurred at another facility or agency) to their immediate supervisor and complete necessary report(s). All interviewed random staff indicated that they would immediately report sexual abuse or sexual harassment of a detainee to their supervisor and generate necessary reports.</p>

CDM, 4-01/000.00, Crime Reporting Procedures: Notification of Sexual Abuse or Sexual Harassment involving an Inmate, states that in accordance with the Prison Rape Elimination Act (PREA) of 2003, custody personnel shall immediately report any knowledge of retaliation against inmates or staff who have reported an incident of sexual abuse or sexual harassment involving an inmate. Interviews with random staff also indicated knowledge of this policy and their lawful obligation to report all incidents.

The standard requires that the Agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse, sexual harassment, retaliation, and staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The facility provided two policies (CDM, 3-04/025.55, PREA- Protection Against Retaliation and CDM, 5-12/005.05, Anti-Retaliation Policy) to support a compliance finding. A review of both policies reflects that the policies fail to include language that requires staff to immediately report knowledge, suspicion, or information regarding staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Based on interviews with random staff, several staff were not aware that they are required to immediately report staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. One staff indicated they did not know how to handle a detainee complaining about staff neglect. The agency/facility did not demonstrate compliance with provision (a) of this standard.

#### 115.161 (b)

CDM, 4-01/000.00, Crime Reporting Procedures, last revised on December 8, 2021, states that Department members shall not reveal any information related to a sexual abuse or sexual harassment report to anyone other than to the extent necessary to obtain treatment or aid in the investigation. Random staff interviews confirmed that staff have an understanding of the policy and are aware of the importance of confidentiality of sexual abuse information by sharing internally with only those who need to know. The facility is compliant with provision (b) of this standard.

#### 115.161 (c)

The standard requires that if an alleged victim is under the age of 18 or considered a vulnerable adult under a state or local vulnerable persons statute, the Agency shall report the allegation to the designated state or local services agency under applicable mandatory reporting laws. The Facility Director indicated that the incident would be handled by first generating a PREA alert and for staff to advise a supervisor of the incident. First responders should ensure that the suspect and victim are separated, and medical care is provided to the victim. Deputies will generate a crime report and the investigation will be handled internally by LASD's investigators. LASD does not refer criminal activity to outside agencies to investigate.

Based on informal conversations the audit team had with staff, detainees under the

age of 18 are segregated from all other detainees and are under direct supervision of a staff member for a time frame not to exceed six hours. Within the six-hour time frame, it will be determined if the youth's parents are called or if the youth is sent to juvenile hall. The PREA Coordinator indicated that he has never experienced this situation because detainees under the age of 18 are held for no more than six hours.

The Special Victims Bureau indicated that if a victim is under the age of 18 and is sexually abused while in custody, the Agency will contact the Department of Children and Family Services to report the incident. The information is entered into the Electronic Suspected Child Abuse Report System (ESCARS). The County of Los Angeles utilizes ESCARS to aid in parallel investigations by facilitating the transfer of information between social workers and law enforcement. LASD documents their investigative files to reflect that they contacted the Department of Children and Family Services to report the abuse. Agency proof of practice is required to determine compliance with provision (c) of this standard. Additionally, these requirements should be memorialized in current policy.

#### 115.161 (d)

The standard requires that the Agency shall report all allegations of sexual abuse, including third-party and anonymous reports, to the Agency's designated investigators. The Agency Head Designee confirmed that all allegations of sexual abuse, including third-party and anonymous reports, are handled by designated investigators within LASD. For inmate-on-inmate allegations, the investigation would be handled by Jail Investigations Unit (JIU). If the sexual abuse involving staff on inmate, Internal Criminal Investigations Bureau (ICIB) is assigned the investigation. The Facility Director indicated that case assignment guidance is provided in Chapter 4 of the MPP. Interviews with investigative staff collaborated that LASD conducts their own investigations, including third-party and anonymous reports. The facility is compliant with provision (d) of this standard.

The agency/facility is not compliant with provisions (a) and (c) of this standard. Correction action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall revise CDM, 4-01/000.00, Crime Reporting Procedures: Notification of Sexual Abuse or Sexual Harassment Involving an Inmate, to include specific language requiring staff to immediately report any knowledge, suspicion, or information of any staff neglect or violation of responsibilities that may have contributed to an incident of retaliation.
2. LASD shall train staff to immediately report any knowledge, suspicion, or information of any staff neglect or violations of responsibilities that may have contributed to an incident or retaliation. LASD shall provide staff with examples so they can identify staff neglect or violation of responsibilities.
3. LASD shall provide investigative files to the audit team to support the proof of practice that the Agency reports allegations of sexual abuse to designated

	<p style="text-align: center;">state or local services under applicable mandatory reporting laws.</p> <p>Implemented Corrective Action as of April 12, 2023, and Final Reporting:</p> <ol style="list-style-type: none"> <li>1. LASD revised CDM, 4-01/000.00, Crime Reporting Procedures: Notification of Sexual Abuse or Sexual Harassment Involving an Inmate, to include specific language requiring staff to immediately report any knowledge, suspicion, or information of any staff neglect or violation of responsibilities that may have contributed to an incident of retaliation. The revised draft policy is consistent with the requirements of provision (a) of this standard. However, LASD did not finalize, implement, retrain, and institutionalize the revised policy.</li> <li>2. Since the onsite audit, LASD has not trained staff to immediately report any knowledge, suspicion, or information of any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Within the preceding three years, Lakewood Station has not had any allegations of sexual abuse that required LASD to report to a designated state or local services under applicable reporting laws.</li> </ol> <p>The Agency is not compliant with provision (a) of this standard.</p>
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<b>115.162</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. LASD, CDM, 6-04/020.00, Station Jail Inmate Classification Questionnaire (SH-R-456)</li> <li>3. LASD, CDM, 5-02/050, Classification, Screening, and Housing of Gay, Gender Non-Conforming, Intersex and Transgender Inmates, Revised February 8, 2018</li> <li>4. LASD, CDM, 6-03/000.00, Policies and Procedures</li> <li>5. LASD, CDM, 5-01/030.00, Inmate Classification and Identification</li> <li>6. LASD, CDM, 3-04/025.10, Staff First Responder Duties</li> <li>7. Agency Head Designee Interview</li> <li>8. Facility Director Interview</li> <li>9. Random Staff Interviews</li> </ol> <p>115.162 (a)</p> <p>LASD provided the audit team with four policies pertaining to classification and screening of detainees for our analysis. All four policies provide proactive steps to</p>

protect detainees upon entering the lockup but none address incidents involving imminent sexual abuse that occur after classification and screening.

Lakewood Station indicated in the PAQ that it has not had any instances in the last 12 months where a detainee was subjected to substantial risk of imminent harm but indicated that the information is not tracked. The Agency PREA Coordinator indicated that he requested Lakewood operations staff develop a method to track such occurrences and begin tracking on August 1, 2022. The facility should ensure any incidents in which a detainee is subjected to substantial risk of imminent harm is tracked. LASD should develop a tracking mechanism to include the time the risk was recognized, the time that action was taken by staff to protect the detainee, and the details of the incident. The documentation should include the average amount of time and longest period of time that passed before acting. This information will be required for future audits.

Interviews with randomly selected lockup staff indicated an understanding of steps to ensure immediate protection of a detainee who is subject to a substantial risk of imminent sexual abuse. Interviewed staff indicated that they would act immediately to remove the detainee from the dangerous situation and place them in a holding cell by themselves for their safety. If there is not enough room to house the detainee alone, the detainee will be transported by patrol car to the IRC to be processed. The Agency Head Designee and Facility Director confirmed a detainee would be sent to the Inmate Reception Center if they could not be housed safely at Lakewood Station. Although this standard does not require policy, LASD should consider memorializing expectations and practice in current PREA policies.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. Initially, based in information reviewed during the onsite audit, the audit team determined that LASD was compliant with Standard 115.162, Agency Protection Duties. During the onsite audit, interviewed staff conveyed an understanding of steps to take to ensure that detainees receive immediate protection when subjected to a substantial risk of imminent sexual abuse and LASD provided policies that documented proactive steps to protect detainees upon entering a lockup. Upon reviewing sexual abuse investigations, the audit team watched body-worn camera video footage of investigative interviews of detainees who were involved in a sexual abuse incident. A detainee who was involved in a sexual abuse incident indicated they requested to be moved from their cell due to erratic behavior and sexual harassment by the alleged suspect. According to the alleged victim, staff indicated the station jail was full, and they could not be moved. The alleged suspect stated, "you're stuck with me," to the alleged victim after overhearing they would not be moved. The crime report indicates that a sexual battery occurred. This is an example of an incident that could have been averted if staff took proper steps to immediately protect the detainees who were subjected to substantial risk of imminent sexual abuse. As such, LASD failed to demonstrate compliance with Standard 115.162, and it is



	<p>recommended that the Agency re-train custody staff on protection duties.</p> <p>The Agency is not compliant with provisions Standard 115.162.</p>
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<b>115.163</b>	<b>Reporting to other confinement facilities</b>
	<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. LASD, CDM, 3-04/025.15, Criminal and Administrative Investigations, Revised April 3, 2018</li> <li>3. LASD, CDM, 8-03/060.00, PREA - Related Grievances, Revised July 15, 2016</li> <li>4. Facility Director Interview</li> <li>5. Agency Head Designee Interview</li> </ol> <p>115.163 (a)-(d)</p> <p>CDM, 3-04/025.15 Criminal and Administrative Investigations, states a courtesy report shall be taken for inmates who report criminal incidents of sexual abuse that occurred in a Department facility at a previous time or confinement facility outside of the Departments purview. This policy states that the agency responsible for the facility at which the incident occurred shall be notified of the courtesy report or any allegation where a courtesy report was not taken within 72 hours of the allegation. This policy states the PREA Compliance Manager of the facility shall track all courtesy reports/allegations and notifications made to other agencies. The policy language fails to require the “head of the facility” receiving the inmate report to notify the head of the other facility or appropriate office of the agency where the sexual abuse is alleged to have occurred. The policy language also does not include clear language that the notification must be made as soon as possible, but no later than 72 hours and documented in the same time frame.</p> <p>The facility indicated in the PAQ that they had zero allegations in the past 12 months that a detainee was sexually abused while confined at another facility. The Facility Director indicated that they have not received any allegations from another facility or agency that an incident of sexual abuse occurred at Lakewood Station, nor has he sent courtesy reports to other agencies providing notification that sexual abuse occurred while someone was detained at another facility. The Facility Director indicated that a memo would be generated about the allegation of sexual abuse, and he would have a supervisor handle the allegation immediately, per CDM, 8-03/060.00, PREA- Related Grievances, which states inmate grievances involving</p>

allegations described in the Prison Rape Elimination Act (PREA) shall be thoroughly investigated. There shall be no deadline for filing PREA grievances by inmates.

The Agency Head Designee indicated that LASD's PREA Coordinator is the designated point of contact. This is not consistent with the Agency's PREA policy that states that the PREA Compliance Manager is responsible for tracking all courtesy reports/allegations and notifications made to other agencies. If the Agency PREA Coordinator is the point of contact, it is recommended that LASD revise CDM, 3-04/025.15, Criminal and Administrative Investigations, to reflect the correct point of contact responsible for tracking all courtesy reports/allegations and notifications made to other agencies.

The audit team was advised by the Agency Head Designee that a PREA alert would be generated and everyone that needs to be notified will be notified, including the facility commander, captain, PREA Compliance Team and grievance team. He stated that the policy provides guidance on how to respond. The Agency Head Designee indicated that the Office of PREA Compliance has records of the notifications. LASD did not provide proof of practice to verify notifications are documented or investigated.

The Agency did not demonstrate compliance with this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall revise CDM, 3-04/025.15, Criminal and Administrative Investigations, to ensure it is consistent with the requirements of this standard.
2. LASD shall provide proof of practice that notifications are made within 72 hours, notifications are documented, and allegations are investigated in accordance with this standard.
3. LASD shall ensure that upon receiving an allegation that a detainee was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. LASD shall train the Facility Head regarding how to handle reporting to other confinement facilities in accordance with this standard. The Agency shall provide proof that the Facility Head was provided with such training.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD revised CDM, 3-04/025.15, Criminal and Administrative Investigations to include language that PREA related sexual abuse shall be reported "as soon as possible" but no later than 72 hours of the allegation. In addition, LASD added language to the draft policy that states, "[u]pon receiving an allegation that a detainee was sexually abused while confined at a facility outside of the Department's purview, the responsible LASD Unit Commander

	<p>shall notify the head of the facility or the appropriate office of the agency where the alleged sexual abuse occurred.” The draft policy is consistent with the requirements of the provision (a) of this standard. However, LASD did not finalize, implement, or institutionalize the revised policy.</p> <p>2. LASD did not provide proof of practice which demonstrates that upon receiving an allegation that a detainee was sexually abused while confined at another facility, the head of the facility that received the allegation notifies the head of the facility or appropriate office of the agency where the alleged abuse occurred. The audit team did see examples of notifications being made within 72 hours. However, these notifications were not made by the head of the facility as required by provision (a) of this standard. LASD’s Office of PREA Compliance developed a training tool to brief Unit Commanders regarding their responsibilities pertaining to PREA notifications to outside agencies. The audit team was provided with a draft letter template that assists the Unit Commander with making notifications to outside law enforcement agencies. In addition, LASD’s Office of PREA Compliance developed a training instrument for Unit Commanders to help them understand their role and responsibilities in making reports to outside agencies. However, LASD did not implement the developed training instrument.</p> <p>The Agency is not compliant with provision (a) of this standard.</p>
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<b>115.164</b>	<b>Staff first responder duties</b>
	<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p> <p><b>Auditor Discussion</b></p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ information</li> <li>2. LASD, CDM, 3-04/025.10, PREA - First Responder Duties and Coordinated Response Protocol, Revised May 3, 2018</li> <li>3. LASD, MPP, 5-09/350.05 - Responsibilities of Station/Unit Personnel and Responding</li> <li>4. Deputies on Rape and Sexual Assault Cases, Revised December 12, 2013</li> <li>5. LASD PREA Response Card</li> <li>6. Incident Report and Supplemental Report</li> <li>7. Random staff interviews</li> <li>8. Law enforcement staff interviews</li> </ol> <p>115.164 (a)</p> <p>According to the information provided by Lakewood Station in the PAQ, the Agency</p>

has established a first responder policy for allegations of sexual abuse. In addition, the PAQ notes that, in the past 12 months, there were zero allegations that a detainee was sexually abused. However, during the onsite audit, the facility indicated there was one allegation of sexual abuse that occurred subsequent to completion of the PAQ.

LASD, CDM, 3-04/025.10, PREA - First Responder Duties and Coordinated Response Protocol, provides that, upon learning of an allegation that an inmate was sexually abused, staff shall:

- Separate the alleged victim(s) and suspect(s)
- Preserve and protect the crime scene until appropriate steps can be taken to collect any evidence
- If the abuse occurred within the past 120 hours, request the alleged victim, if known, not take any actions that could destroy physical evidence prior to its collection, including but not limited to, washing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating
- If the abuse occurred within the past 120 hours, and the quality of the evidence appears to support criminal prosecution, ensure the alleged abuser, if known, does not take any actions that could destroy physical evidence prior to its collection, including but not limited to, washing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating (inasmuch as is feasible)

This CDM policy meets all the required elements of this provision and, as discussed under Standard 115.121, comports with current best practices, which indicates that DNA evidence may be recoverable up to 120 hours after an assault. The audit team also reviewed MPP, 5-09/350.05, Responsibilities of Station/Unit Personnel and Responding Deputies on Rape and Sexual Assault Cases, which directs responding deputies to transport the victim for treatment and a forensic exam if the assault occurred within 96 hours. This MPP policy not only contradicts the CDM policy, but it also does not comport with current best practices. LASD should re-evaluate the MPP policy.

The audit team reviewed the Incident Report and the Supplemental Report for the allegation of sexual abuse that occurred at the Lakewood Station lockup and noted documentation that responding deputies immediately separated the alleged victim(s) and suspect(s) upon notification of the allegation. Additionally, the victim(s) were offered and declined a forensic medical examination.

Law enforcement staff who were interviewed by the audit team conveyed an understanding of initial first responder steps, including separating the alleged victim(s) and suspect(s) and securing the crime scene. However, staff did not articulate a comprehensive understanding of the steps they are required to take to preserve and protect the crime scene until appropriate steps can be taken to collect any evidence, including timelines and protocols that maximizes the potential for obtaining usable physical evidence. The facility did not demonstrate compliance

with provision (a) of this standard.

Lakewood Station provided LASD's PREA Response Card in the PAQ, which is reportedly provided to potential first responders. The PREA Response Card outlines steps that must be taken by custody personnel and handling sergeants when presented with an incident of sexual abuse or sexual harassment. Most staff did not reference this card during interviews with the audit team. Additionally, the card was not mentioned by any staff or visible during the site review.

115.164 (b)

According to the information provided by Lakewood Station in the PAQ, the Agency reports that all staff first responders are law enforcement, and thus, no agency policy requires the first staff responder who is not a law enforcement staff member request that the alleged victim not take any actions that could destroy physical evidence and notify law enforcement staff immediately.

All staff members who work in the Lakewood Station have some level of contact with inmate workers who are regularly at the facility. As such, non-law-enforcement staff might find themselves in a situation where they are the first to be notified of an allegation of sexual abuse by an alleged victim.

Furthermore, although the Interview Information Request completed by the Lakewood Station provides that no non-law-enforcement staff enter the lockup area, the audit team, during interviews of random staff, identified one non-law-enforcement staff who enters the lockup regularly and thus could discover sexual abuse. As such, the audit team believes that provision 115.164 (b) does apply to the Lakewood Station.

During interviews, non-law-enforcement staff conveyed an understanding of the requirement to notify law enforcement staff (generally a sergeant) immediately if they are notified of an allegation of sexual abuse. Most non-law-enforcement staff also indicated that they would take steps to ensure the safety of the alleged victim, such as not allowing the alleged victim to return to their housing unit in the event of imminent danger of further abuse. However, most non-law-enforcement staff did not indicate that they would request that the alleged victim not take any actions that could destroy physical evidence as required by provision 115.164 (b). The agency did not demonstrate compliance with provision (b) of this standard.

The Agency did not demonstrate compliance with this standard.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall revise MPP, 5-09/350.05, Responsibilities of Station/Unit Personnel and Responding Deputies on Rape and Sexual Assault Cases, to ensure that it reflects best practices for the preservation of evidence and that it does not conflict with any other existing policies.
2. LASD shall develop and implement training for all Lakewood Station staff regarding staff first responder duties consistent with this standard. The

	<p>Agency shall provide the audit team with proof that such training was provided.</p> <p>Implemented Corrective Action as of April 12, 2023, and Final Reporting:</p> <ol style="list-style-type: none"> <li>1. LASD revised and finalized MPP, 5-09/350.05, Responsibilities of Station/Unit Personnel and Special Victims Bureau Personnel on Rape and Sexual Assault Cases on December 16, 2022, to comport with current best practices, which provides that DNA evidence is recoverable up to 120 hours after an assault. The revised policy is now consistent with CDM, 3-04/025.10, First Responder Duties and Coordinated Response Protocol.</li> <li>2. On December 23, 2022, LASD Field Operations Support Services Unit issued a department-wide email with the policy revision for MPP, 5-09/350.05, Responsibilities of Station/Unit Personnel and Special Victims Bureau on Rape and Sexual Assault Cases. While conducting our post onsite visit to Lakewood Station on April 11, 2023, the audit team asked seasoned staff about how long DNA evidence is recoverable, and they responded 48 hours. Despite the policy revision and the dissemination of the new policy, LASD has not institutionalized the revised policy.</li> </ol> <p>The Agency is not compliant with provisions (a) and (b) of this standard.</p>
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<b>115.165</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ information</li> <li>2. LASD, CDM, 3-04/025.10, PREA - First Responder Duties and Coordinated Response Protocol, Revised on May 3, 2018</li> <li>3. 45 Code of Federal Regulations (CFR) section 164.512 (k)(5)(i)(A)-(F)</li> <li>4. Incident Report and Supplemental Report</li> <li>5. Facility Director Interview</li> </ol> <p>115.165 (a)</p> <p>According to the information provided by Lakewood Station in the PAQ, the Agency reports that it has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and agency leadership.</p> <p>CDM, 3-04/025.10, PREA - First Responder Duties and Coordinated Response</p>

Protocol, states that every facility shall establish a “Coordinated Response Protocol” for procedures that shall be followed when there is a report received, whether made verbally or in writing, including third-party and anonymous reports of sexual abuse involving an inmate. It shall include the following:

- First responder duties
- Supervisor responsibilities
- Notifications to CIS
- Notification to Unit Commander
- Notification to Watch Commander
- Notification to PREA Coordinator
- PREA Compliance Manager responsibilities
- Medical and mental health staff responsibilities for immediate and follow-up care
- Contracted hospital(s) where the inmate will be transported to if a forensic Sexual Assault Rape Treatment Protocol (SART) exam is required
- Procedures for providing outside resources to the inmate (e.g., victim advocate during SART exam, contact with rape crisis centers for emotional support, etc.)

Lakewood Station does not have a written “Coordinated Response Protocol” to respond to allegations of sexual abuse as required by the Agency’s policy. During the interview, the Facility Director stated that, upon receiving a report of sexual abuse, the facility would refer to the agency policy above to coordinate a response to an incident. Yet, the agency policy requires that every facility establish its own Coordinated Response Protocol. Likewise, the provision requires that facilities develop a facility-specific written institutional plan to coordinate responses to incidents of sexual abuse. In addition, the provision requires that the written plan identify, describe, and coordinate the duties of, at a minimum, the following individuals: staff first responders, medical and mental health practitioners, investigators, and facility leadership. The written plan must also establish how the responsible staff will perform their required functions and work together in response to an incident of sexual abuse. The Agency did not demonstrate compliance with provision (a) of this standard.

#### 115.165 (b)

According to the information provided by Lakewood Station in the PAQ, the Agency reports that it is permitted by law to inform a receiving facility, where a victim is transferred from the lockup to a jail, prison, or medical facility as a result of an allegation of sexual abuse, of the incident and the victim’s potential need for medical or social services pursuant to 45 CFR section 164.512 (k)(5)(i)(A)-(F), which provides:

(5) Correctional institutions and other law enforcement custodial situations -

(i) Permitted disclosures. A covered entity may disclose to a correctional institution or a law enforcement official having lawful custody of an inmate or other individual

protected health information about such inmate or individual, if the correctional institution or such law enforcement official represents that such protected health information is necessary for:

(A) The provision of health care to such individuals;

(B) The health and safety of such individual or other inmates;

(C) The health and safety of the officers or employees of or others at the correctional institution;

(D) The health and safety of such individuals and officers or other persons responsible for the transporting of inmates or their transfer from one institution, facility, or setting to another;

(E) Law enforcement on the premises of the correctional institution; or

(F) The administration and maintenance of the safety, security, and good order of the correctional institution.

While this section of the CFR does discuss uses and disclosures of protected health information without the authorization of the individual or the opportunity for the individual to agree or object in certain situations, it applies only to covered entities as defined by 45 CFR section 160.103. Under 45 CFR section 160.103, a “covered entity” is defined as (1) a health plan, (2) a health care clearinghouse, and (3) a health care provider who transmits any health information in electronic form in connection with certain transactions. As such, the CFR section provided by the Agency pertains to situations where the three covered entities may disclose protected health information to a correctional institution or a law enforcement representative, not situations where a correctional institution or law enforcement agency may inform a jail, prison, or medical facility of an allegation of sexual abuse or the victim’s potential need for medical or social services as discussed under provision 115.165 (b).

The PAQ reflected that there were zero instances where a victim was transferred from a lockup to a jail, prison, or medical facility and informs the receiving facility of an incident and the victims potential need for medical or social services due to a sexual assault or otherwise, within the last 12 months. However, during the onsite audit, the facility indicated there was one allegation of sexual abuse subsequent to completion of the PAQ. The incident report indicates the victim was transported to a local hospital for treatment. However, the audit team did not identify any documentation indicating whether or not the medical facility was informed of the incident.

The Facility Director indicated detainees are never transferred to prison from the Lakewood Station lockup. He indicated only pertinent medical information is shared with medical staff when a detainee is transported to a hospital or other LASD facility. It is unclear what information LASD is permitted by law to share and whether or not a victim's request not to share is considered. LASD indicated an opinion from Los



Angeles County's Office of County Counsel is pending.

The Agency is not compliant with provisions (a) and (b) of this standard.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall develop, implement, and institutionalize a written institutional plan to coordinate actions taken in response to a lockup incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and agency leadership. The plan must provide detailed guidance to staff, so they have a clear understanding for each staff member's role and responsibilities.
2. LASD shall provide training to Lakewood Station staff regarding the coordinated response protocol and how to fulfill their respective responsibilities. LASD shall provide proof that such training was conducted.
3. LASD shall determine if it is permitted by law to inform a receiving facility, where a victim is transferred as a result of an allegation of sexual abuse, of the incident and the victim's potential need for medical or social services. LASD shall provide the audit team with this information.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD revised CDM, 3-04/025.10, PREA- First Responder Duties and Coordinated Response Protocol, which now excludes the requirement that each facility establish their own Coordinated Response Protocol. The policy now applies "to all custody facilities to include all patrol stations." The revised policy outlines responsibilities for staff first responders, supervisors, PREA Compliance Managers and provides a resource guide for contracted hospitals that perform Sexual Assault Rape Treatment (SART) exams. The draft policy states that the PREA Compliance Manager is responsible for ensuring that the handling sergeant investigates and renders a disposition promptly, thoroughly, and objectively but the policy does not provide detailed guidance for investigations. The audit team recommends expanding the policy to include clearly defined investigator duties as many interviewed staff did not understand basic investigative practices or who is responsible for conducting PREA investigations in the station jails. In addition, the draft policy has not been finalized, implemented, or institutionalized Standard provision 115.165 (a).
2. LASD has not provided training to Lakewood Staff regarding the coordinated response protocol or how to fulfill their respective responsibilities.
3. Los Angeles County Counsel provided a legal analysis for Standard provision 115.165 (b) that states in part "that it would be a violation of California Penal Code Section 673 for a Department member to allow any lack of care whatever which would injure or impair the health of the prisoner, inmate, or person confined. Therefore, when a Department member escorts an inmate to a medical facility or transfers an inmate to another facility, it would violate California Penal Code Section 673 to fail to inform the hospital or

	<p>receiving facility that the inmate is in need of care. Additionally, per MPP 2-01/000.00, Code of Ethics, Department members have a fundamental duty to serve mankind and safeguard lives. Failure to provide relevant information to medical personnel would violate this policy. Per CDM 3-04/025.00 Prison Rape Elimination Act of 2003 (PREA), Department personnel are required to care for and protect inmates remanded to the custody of the Sheriff. Failure to provide relevant information to medical personnel would violate this policy.” LASD should provide guidance and training to sworn personnel regarding what information can and should be shared so they have a clear understanding of their responsibilities.</p> <p>The Agency is not compliant with provisions (a) and (b) of this standard.</p>
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<p><b>115.166</b></p>	<p><b>Preservation of ability to protect detainees from contact with abusers</b></p>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Association for Los Angeles Deputy Sheriffs (ALADS) Memorandum of Understanding (MOU)</li> <li>2. Los Angeles County Professional Peace Officers Association (PPOA) MOU for Custody Assistants/Correctional Officers</li> <li>3. PPOA MOU for Supervisory Peace Officers</li> <li>4. Los Angeles County Bargaining Unit; Service Employees International Union (SEIU) Local 721, MOU for Supervising Administrative, Technical, and Staff Services</li> <li>5. Agency Head Designee Interview</li> <li>6. Email correspondence from ALADS</li> <li>7. Email correspondence from PAB</li> <li>8. Administrative Investigation Dispositions</li> </ol> <p>115.166 (a)-(b)</p> <p>LASD entered into four Collective Bargaining Agreements with the following labor unions: Association for Los Angeles Deputy Sheriffs (ALADS) entered into a MOU on October 16, 2018 and expired on January 31, 2021; Los Angeles County Professional Peace Officers Association (PPOA) for Custody Assistants/Correctional Officers entered into a MOU on February 19, 2019, and expired on September 30, 2021; PPOA for Supervisory Peace Officers entered into a MOU on October 16, 2018, and expired on January 31, 2021, and SEIU Local 721 for supervising administrative, technical and staff services entered into a MOU on December 8,</p>

2015, and expired on September 30, 2018. All Collective Bargaining Agreements were entered into after August 2012, which complies with this standard.

All agreements state in varying language that LASD can exercise control and discretion over its organization and operations. LASD has the exclusive right to direct its employees, take disciplinary action for proper cause, relieve its employees from duty, effect work furloughs or any other alternatives, because of lack of work or for other legitimate reasons. Nothing in these agreements limits the Agency's ability to remove alleged staff abusers from contact with detainees pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.

All the Collective Bargaining Agreements provided by LASD have expired. The Agency Head Designee indicated that the unions have no control over relieving staff of duty or moving them to another role when necessary. The audit team was advised that a deputy can be easily moved to a desk job with no contact with inmates, if needed. It was explained that it is not punitive as it protects both the deputy and inmate victim. LASD has both "line" and "off-line" positions. Policy violations or a criminal allegation will be fully investigated.

To ensure that LASD has maintained the right to discipline as appropriate regardless of the expired agreement, the audit team requested and received dispositions for the five most recently closed/completed Internal Affairs Bureau investigations involving staff on inmate sexual abuse or sexual harassment allegations at the Agency's custody facilities. All five investigations were closed after the expiration of the Collective Bargaining Agreements. Four out of five of the investigations were founded and resulted in discipline of involved employees, which demonstrates that LASD has maintained the right to discipline as appropriate, regardless of the expired agreement.

PAB confirmed that despite having expired Collective Bargaining Agreements, LASD maintains the right to discipline as appropriate. The audit team reviewed email correspondence from ALADS, PPOA, and SEIU Local 721 that provided assurances that the expired and upcoming new MOU's do not restrict the Agency's compliance with Standard 115.166. We did not receive correspondence from the other labor unions.

Although LASD provided expired Collective Bargaining Agreements, the Agency demonstrated it has maintained the right to discipline as appropriate. LASD should work on updating their MOU with labor unions, or if they are no longer applicable, discontinue to provide them for the purpose of showing compliance. The Agency demonstrated compliance with this standard.

**Auditor Overall Determination:** Does Not Meet Standard

**Auditor Discussion**

The following evidence was analyzed in making the compliance determination:

1. Lakewood Station's PAQ information
2. Lakewood Station Interview Information Request Form
3. LASD, CDM, 3-04/025.55, PREA - Protection Against Retaliation, Revised on April 3, 2018
4. LASD, CDM, 5-12/005.05, Anti-Retaliation Policy, Revised on November 15, 2018
5. LASD, MPP, 3-01/121.35, Policy of Equality - Retaliation, Revised on November 20, 2020
6. LASD, MPP, 3-01/121.55, Policy of Equality - No Retaliation, Revised on November 20, 2020
7. Agency Head interview
8. Facility Director interview
9. Designated Staff Member Charged with Monitoring Retaliation Interviews

115.167 (a) - (d)

According to the information provided by Lakewood Station in the PAQ, the Agency reports it has a policy to protect all detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or harassment investigations from retaliation by other detainees or staff.

CDM, 3-04/025.55, PREA - Protection Against Retaliation, provides that the Department does not tolerate any form of retaliation against an inmate for reporting incidents of sexual abuse or sexual harassment by another inmate, Department personnel, volunteers, or contractors, per CDM, 5-12/005.05, Anti-Retaliation Policy. CDM, 5-12/005.05, Anti-Retaliation Policy, states inmates shall not be subject to retaliation for any reason. The policy requires that inmates not be threatened, intimidated, abused, denied privileges or access to programs or services, or disciplined for speaking with a legal representative, advocacy organization, and investigative entity or for expressing any dissatisfaction with any LASD personnel or conditions of confinement. While LASD's anti-retaliation policy is broad, it does not include the specific language to protect detainees and staff who cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff.

MPP, 3-01/121.35, Policy of Equality - Retaliation, provides that retaliation for the purpose of the policy is an adverse employment action against another for reporting protected incident, filing a complaint of conduct or opposing conduct that violates this policy or related state or federal law, participating in an investigation, administrative proceeding, or otherwise exercising their rights or performing their duties under this policy or related state or federal law. MPP, 3-01/121.55, Policy of Equality - No Retaliation, absolutely prohibits retaliation and states that no person

will be retaliated against for making a complaint of conduct that violates this policy or the law, cooperating in any investigation or corrective action, or otherwise preventing prohibited practices under this policy or the law. These policies, when taken together, demonstrate compliance with the requirement to establish policy to protect all staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation.

Lakewood Station indicated in the PAQ that there were no incidents of retaliation that occurred during the 12 months preceding the audit. According to the Lakewood Station Interview Information Request Form, the facility has designated staff to monitor retaliation for inmate-on-inmate allegations and staff-on-inmate allegations. The Interview Information Request Form, however, did not provide information as to who is responsible for monitoring the conduct and treatment of staff who report sexual abuse. During interviews with staff who are charged with monitoring retaliation for both inmate-on-inmate allegations and staff-on-inmate allegations, staff advised that they have not had to monitor for retaliation. Staff stated that detainees are generally held at the station for a short period of time before being transferred. Despite not having had to monitor for retaliation, staff conveyed a sound understanding of the requirements to employ multiple protection measures, such as housing changes or transfers for detainee victims or abusers, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The Agency has also delineated these requirements under CDM, 3-04/025.55, PREA - Protection Against Retaliation. The Agency Head Designee stated that medical and mental health care is offered to inmate victims and services are offered to staff via the Psychological Service Bureau and discussed several protective measures that facilities may employ. The Facility Director also explained the various protective measures that may be employed.

Although Lakewood Station reports in the PAQ that there were no allegations of sexual abuse or sexual assault in the preceding 12 months, there was one sexual abuse incident subsequent to the PAQ. According to the Incident Report and the Supplement Report, staff separated the alleged victim(s) from the abuser(s) immediately upon learning of the incident.

The Agency has established a formal process for monitoring retaliation. CDM, 3-04/025.55, PREA - Protection Against Retaliation, provides that any inmate who reports an incident of sexual abuse or sexual harassment shall be monitored for at least 90 days following the report to see if there is evidence that suggests possible retaliation by other inmates or staff. The policy also requires that monitoring continue beyond the 90 days if the initial monitoring indicates an ongoing need. Monitoring shall include:

- Periodic in-person conversations with inmates by the facility's PREA Compliance Manager
- Review of disciplinary incidents involving the inmate
- Review of housing or program changes involving the inmate

Furthermore, if retaliation is identified, the policy requires that the facility take appropriate measures to ensure the inmate is protected and that the facility acts promptly to remedy any such retaliation.

Staff charged with monitoring retaliation conveyed a good understanding of these requirements, including the requirement to act promptly to remedy retaliation. Although, CDM, 3-04/025.55, Protection Against Retaliation, does not address monitoring the conduct or treatment of staff who reported sexual abuse of a detainee, conversations with the Agency Head Designee and the Facility Director, as detailed below, demonstrated that the Agency would monitor the treatment of staff who have reported sexual abuse and promptly remedy any such retaliation.

This standard also requires that if any other individual who cooperates with an investigation expresses fear of retaliation, the Agency shall take appropriate measures to protect the individual against retaliation. The Agency Head Designee and Facility Director indicated allegations of retaliation are taken very seriously, regardless of whether it is a detainee, staff member, or other individual who is expressing a fear of retaliation. Both indicated the Agency would apply the same protective measures described above to any detainee that expresses a fear of retaliation for cooperating with an investigation. Allegations of retaliation made by staff would be reported up the chain of command and an inquiry and/or formal investigation would be conducted to determine if there is any misconduct. The Facility Director indicated that any staff member who alleges being retaliated against, or a fear of retaliation would be transferred if requested. Additionally, if misconduct was alleged, the subject may be placed on administrative leave pending the outcome of an investigation. Staff would be offered support services from the Department's Psychological Services Bureau. The agency/facility demonstrated compliance with provisions (b), (c), and (d).

The agency/facility did not demonstrate compliance with provision (a). Corrective action is recommended.

Corrective Action as of October 14, 2022:

1. LASD shall revise CDM, 3-04/025.55, PREA - Protection Against Retaliation, to include specific language to protect detainees or staff who cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff.
2. LASD shall designate which staff members are charged with monitoring treatment of staff who have reported sexual abuse. This information shall be provided to the audit team. Relevant staff shall be briefed on the revised policy.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD revised CDM, 3-04/025.55 PREA- Protection Against Retaliation, to include language that states, "[t]he Department does not tolerate any form

	<p>of retaliation against an inmate or a staff member for reporting or cooperating with the investigation of incidents of sexual abuse or sexual harassment by another inmate, Department personnel, volunteers, or contractors.” In addition, the draft policy added language that states, “[t]he station or facility captain or designee shall monitor the retaliation of any staff member who reports or cooperates with the investigation of incidents of sexual abuse or sexual harassment by another inmate, Department personnel, volunteers, or contractors. Any staff who reports an incident of sexual abuse or sexual harassment shall be monitored for at least 90 days following the report to see if there is evidence that suggests possible retaliation by other inmates or staff. Monitoring shall continue beyond the 90 days if the initial monitoring indicates an ongoing need.” The policy revision is consistent with the requirements of provision (a) of this standard. However, LASD did not finalize, implement, or institutionalize the revised policy.</p> <p>2. On April 12, 20223, the audit team received a draft briefing developed to train the Lakewood Station Facility Director on revised draft policy, CDM, 3-04/025.55 PREA-Protection Against Retaliation. During site visit to Lakewood Station on April 11, 2023, the Facility Director indicated he had not received any training during the corrective action period. Supervisory staff indicated that it is the responsibility of all supervisors to monitor retaliation and there was not a designated staff member responsible for monitoring staff or inmate retaliation. The audit team was not provided with information as to who is designated and charged with monitoring retaliation for Lakewood Station staff. As such, the Agency did not demonstrate compliance with provision (a) of this standard.</p> <p>The Agency is not compliant with provisions (a) of this standard.</p>
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<b>115.171</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. LASD, CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations,</li> </ol>

April 3, 2018

3. LASD's Administrative Investigations Handbook
4. LASD, MPP, Section 5-09/350.05, Responsibilities of Station/Unit Personnel and Responding Deputies on Rape and Sexual Assault Cases, Revised 12/12/2013
5. LASD, MPP, 3-01/060.10, Personnel Incident Investigations
6. LASD, MPP, Volume 4, Case Assignment and Reporting
7. Investigative Staff Interviews
8. PREA Coordinator Interview
9. Information from SVB

115.171 (a)

The standard requires that when an agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports and that the facility has a policy related to criminal and administrative agency investigations. CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, covers both criminal and administrative investigations. However, the policy fails to include language that the investigations shall be conducted promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

LASD's Administrative Investigations Handbook references MPP, 3-01/060.10, Personnel Incident Investigations. This policy states that incident investigations applicable to all members of the Department shall be conducted in an impartial and objective manner and the purpose is to disclose and report all facts relevant to the matter. However, this policy does not include language that investigations shall be conducted promptly, nor does it include language that includes third-party and anonymous reports.

MPP, 5-09/350.05, Responsibilities of Station/Unit Personnel and Responding Deputies on Rape and Sexual Assault Cases, states in part, that immediate notification shall be made to SVB without delay. This policy was not conveyed to our audit team by any of the investigative staff interviewed.

MPP, Volume 4, Case Assignment and Reporting, outlines investigative case assignments by crime. Crimes are listed in alphabetical order. Under "Prisoners", the policy indicates incidents occurring at any custody facility are assigned to Jail Investigations Unit or appropriate Detective Bureau or Detail. Under "Rape/Sexual Assault", the policy indicates cases are assigned to SVB.

It is recommended that LASD revise MPP, 5-09/350.05, Responsibilities of Station/Unit Personnel and Responding Deputies on Rape and Sexual Assault Cases, and MPP, Volume 4, Case Assignment and Reporting, to provide clear guidance regarding assignments of criminal allegations of sexual abuse occurring in custody facilities, including inmate-on-inmate and staff-on-inmate allegations.



The audit team interviewed five investigative staff that work in three different investigative bureaus: Jail Investigations Unit (JIU), Internal Affairs Bureau (IAB), and Internal Criminal Investigations Bureau (ICIB). SVB indicated they provide resources or guidance if requested because they have expertise but would never handle an investigation into allegations of sexual abuse or sexual harassment occurring in a custody facility. Therefore, we did not interview any investigative staff from SVB. Interviewed investigative staff indicated that they initiate investigations immediately and handle anonymous and third-party reports of sexual abuse and sexual harassment in the same manner as all other complaints.

Random staff were less clear on which investigative bureau gets contacted or deployed when there is an allegation of sexual assault or sexual harassment at the station lockup. Interviews with random staff indicated that following an allegation of sexual abuse, they would be responsible for immediately conducting preliminary investigative steps and completing an incident report. Details regarding investigative responsibilities of the station level responding deputies and specialized investigators remain unclear to the audit team.

There was one allegation of sexual abuse at Lakewood Station that occurred subsequent to the facility's completion of the PAQ and just prior to the onsite audit. We reviewed the incident report and determined that the report was generated on the same day of the alleged incident. After the initial inquiry was completed, the report documents the investigation was forwarded to the JIU to investigate. The internal time requirements involved in transferring the information from the station to the specialized investigative bureau were unclear. The investigation is ongoing, and a final report has not been completed or provided for review by the audit team.

Because there are no completed investigative reports for PREA-related allegations from Lakewood Station to review to determine compliance with this standard, the audit team requested agency investigative files to determine agency investigative practices. The audit team was not provided with the requested investigative files for review. Therefore, a complete analysis could not be conducted by the audit team for this standard. Agency proof of practice is required to demonstrate compliance with provision (a) of this standard. The Agency did not demonstrate compliance with provision (a) of this standard.

#### 115.171 (b)

As stated above, the audit team interviewed five randomly selected investigative staff. All investigators indicated that they received specialized training in sexual abuse investigations. However, as discussed in Standard 115.134, the audit team was only able to confirm that one investigator completed training that meets the requirements of the standard. Additionally, the audit team was not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (b) of this standard. The Agency did not demonstrate compliance with provision (b) of this standard.

#### 115.171 (c)

Interviews with investigative staff reflected they gather and preserve direct and circumstantial evidence, consisting of, physical and DNA evidence, video evidence, detainee movement documentation, interviews of staff, witnesses, victims and suspects, medical documentation and any other reports that are relevant, including grievances, investigations, prior reports of sexual abuse, and complaints. The audit team was not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (c) of this standard. The Agency did not demonstrate compliance with provision (c) of this standard.

115.171 (d)

CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, states that substantiated allegations of sexual abuse that appear to be criminal shall be referred for prosecution. If any additional interviews are required after an incident of sexual abuse has been referred for prosecution, investigators shall consult with prosecutors to review if they create an obstacle for subsequent criminal prosecution. Interviews of criminal investigators indicated that they do not conduct compelled interviews. However, administrative investigators conduct compelled interviews. The audit team was not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (d) of this standard. The Agency did not demonstrate compliance with provision (d) of this standard.

115.171 (e)

CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, states, in part, that the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the persons status as an inmate or Department member. The policy continues to state that inmates who make allegations of sexual abuse shall not be subjected to a polygraph examination as a condition for proceeding with an investigation. LASD policy is consistent with the standard. Interviews with Investigative Staff reflected that they do not judge credibility of the individuals interviewed based on their status as an inmate or staff member. They indicated that their assessments are based on facts gathered during their investigation. Further, all investigators stated that they do not require detainees who allege sexual abuse to submit to a polygraph examination. The audit team was not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (e) of this standard. The Agency did not demonstrate compliance with provision (e) of this standard.

115.171 (f)

CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, states that during administrative investigations, investigators shall make an effort to determine whether staff actions or failures to act contributed to an incident of sexual abuse, which is consistent with the standard. However, the same language of determining if staff actions or failures to act contributed to the sexual abuse is not included in the criminal portion of the policy. Investigative staff indicated they consider staff actions or failures to act in their administrative investigations. The audit team was

not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (f) of this standard. The Agency did not demonstrate compliance with provision (f) of this standard.

115.171 (g)

CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, states that administrative reports shall also include a description of the physical and/or testimonial evidence, the reasoning behind credibility assessments, investigative facts, and findings under the administrative caption of the policy and not criminal. LASD should consider revising the language in the policy so that documentation requirements for both administrative and criminal investigations are clear.

Interviewed criminal investigators indicated that their reports contain physical, testimonial, and documentary evidence. The audit team was not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (g) of this standard. The Agency did not demonstrate compliance with provision (g) of this standard.

115.171 (h)

CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, states substantiated allegations of sexual abuse that appear to be criminal shall be referred for prosecution. Interviews with investigative staff indicate substantiated allegations of sexual abuse that appear to be criminal are referred for prosecution. The PAQ reflected that Lakewood Station has not had any substantiated allegations of conduct that were referred for prosecution since August 20, 2012. The audit team was not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (h) of this standard. The Agency did not demonstrate compliance with provision (h) of this standard.

115.171 (i)

CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, states that all criminal and administrative reports shall be retained as long as the alleged abuser is incarcerated or employed by the Department, plus five (5) years. LASD policy is consistent with the PREA standard. The audit team was not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (i) of this standard. The Agency did not demonstrate compliance with provision (i) of this standard.

115.171 (j)

The standard requires that the departure of the alleged abuser or victim from the employment or control of the lockup or agency shall not provide a basis for terminating an investigation. CDM, 3-04/025.15, PREA - Criminal and Administrative Investigations, states all sexual abuse investigations shall continue regardless of whether the alleged abuser or victim is no longer in custody or no longer employed with the Department. Interviewed staff indicated that the investigation continues

regardless of the departure of the alleged abuser or victim. The audit team was not provided with requested investigative files for review. Agency proof of practice is required to demonstrate compliance with provision (j) of this standard. The Agency did not demonstrate compliance with provision (j) of this standard.

115.171 (k)

The auditor is not required to audit this provision.

115.171 (l)

The Agency conducts its own administrative and criminal investigations of sexual abuse. Therefore, provision (l) of this standard does not apply.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall provide the audit team with proof of practice to demonstrate compliance with this standard. This shall include requested trackers and investigative files for criminal and administrative investigations into allegations of sexual abuse and sexual harassment occurring in custody facilities.
2. LASD shall ensure investigations into sexual abuse and sexual harassment are conducted promptly, thoroughly, and objectively, including third party and anonymous reports.
3. LASD shall ensure where sexual abuse is alleged, the Agency uses investigators who have received special training in sexual abuse investigations pursuant to Standard 115.134.
4. LASD shall ensure investigators: (1) gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; (2) interview alleged victims, suspected perpetrators, and witnesses; and (3) review prior complaints and reports of sexual abuse involving the suspected perpetrator.
5. LASD shall ensure the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as detainee or staff. Additionally, LASD shall not require a detainee who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.
6. LASD shall ensure that administrative investigations: (1) include an effort to determine whether staff actions or failures to act contributed to the abuse; and (2) be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.
7. LASD shall ensure criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.
8. LASD shall ensure substantiated allegations of conduct that appear to be

criminal shall be referred for prosecution.

9. LASD shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the Agency, plus five years.
10. LASD shall ensure the departure of the alleged abuser or victim from the employment or control of the lockup or agency shall not provide a basis for terminating an investigation.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

Lakewood Station had one sexual abuse allegation during the audit period. To evaluate the LASD's investigative practices, the audit team selected a random sample of 27 additional investigative files, including criminal and administrative investigations conducted by investigative staff assigned to ICIB, IAB, JIU, and units (jail facilities and station lockups). The 28 investigative files reviewed include 10 allegations of inmate-on-inmate sexual abuse, 3 allegations of inmate-on-inmate sexual harassment, 11 allegations of staff-on-inmate sexual abuse, and 4 allegations of staff-on-inmate sexual harassment.

Of the 28 investigations reviewed, 10 were conducted by investigative staff assigned to LASD's IAB or ICIB, and were conducted promptly, thoroughly, and objectively. However, the remaining 18 investigations were conducted by unit level or JIU investigative staff and were not all conducted promptly, thoroughly, and/or objectively. Of the 18 investigations, 17 were initiated promptly, 6 were concluded within 30 days, 3 were concluded within 90 days, 4 were concluded within 120 days, 2 were concluded within 150 days, and 3 concluded after more than 180 days (247, 446, 822 days). Of the 18 investigations, 7 did not include a written investigative report or were missing initial or supplemental reports, 9 did not include a thorough description of physical and testimonial evidence, 5 did not appear to interview all potential involved persons, and 6 did not document preserving and reviewing any available electronic monitoring data. None of the investigative files included documentation regarding if prior complaints or reports involving the suspected perpetrator were reviewed. Additionally, the audit team noted some investigative files were incomplete and did not include documents and correspondence referenced in investigative reports or notes.

In one inmate-on-inmate sexual harassment investigation, documentation indicates the alleged victim requested to move to a cell on the upper tier of the module due to months of sexual harassment by another inmate housed in a nearby cell on the lower tier. The investigation was initiated 26 days after the Department received a grievance from the alleged victim and concluded on the same day. In the grievance, the alleged victim indicates they filed another grievance approximately 10 weeks prior and did not receive a response. The investigative file indicates the inmate was interviewed, module staff would "look into a cell move to the upper tier", and module staff were told to "monitor future interactions between the two inmates." The investigative file did not contain a written investigative report or any documentation regarding if the investigator interviewed the alleged suspect,

interviewed any potential witnesses, or reviewed any available CCTV video footage. The allegation was not sustained and relief for the inmate was denied. The audit team reviewed housing location history in LASD's Inmate Total Movement History database and confirmed the alleged victim and suspect were not moved.

In three inmate-on-inmate sexual abuse investigations, initial investigative staff failed to collect DNA evidence during the initial investigation. In one investigation into allegations of battery and sexual battery, several items were collected during the initial investigation and submitted to LASD's Scientific Services Bureau for analysis. However, analysis could not be conducted because a DNA reference sample was not obtained from the alleged suspect or victims. This investigation concluded approximately 106 days after the allegations were reported. This case was referred to the Los Angeles County District Attorney's Office for filing consideration and is pending a response. In another investigation into an allegation of sodomy, a DNA reference sample was obtained from the alleged suspect by JIU investigative staff approximately 31 months after the incident occurred and matched DNA recovered from the victim. This investigation concluded approximately 822 days after the allegation was reported. The suspect was charged with one felony count of sodomy, two felony counts of forcible oral copulation, and one felony count of sodomy by use of force. According to JIU investigative staff, the suspect was convicted.

In another investigation into an allegation of sodomy, a reference DNA sample was never obtained from the alleged suspect. The alleged victim indicated they were sexually abused by the alleged suspect every day over a three-day period. The victim underwent a sexual assault forensic examination. The Biological Evidence and DNA Examination Report indicates the alleged victim had seminal fluid from two contributors on their anus, however, an insufficient amount of DNA was detected in this sample for analysis. Initial investigative staff documented only reviewing approximately five hours of CCTV video footage from the first day the victim reported being sexually abused due to "time constraints." The case was referred to the Los Angeles County District Attorney's Office for filing consideration and was declined for prosecution. The District Attorney Evaluation Sheet indicated JIU investigative staff should advise deputies involved in the initial investigation that a buccal swab should be requested from a suspect in a case in which a victim receives a sexual assault forensic examination. According to the investigative notes, the District Attorney's Office requested JIU investigative staff review CCTV video for a nine-hour period on each of the three days the victim indicated they were sexually abused. JIU investigative staff reviewed the additional CCTV video and concluded there was no evidence of a crime. The investigative file did not include any preserved CCTV video evidence. The investigation concluded approximately 247 days after the allegation was reported with a disposition of unsubstantiated.

While reviewing JIU investigative files, the audit team noted several extension advisory memos which indicate cases would not be closed "due to large caseloads, court and jury trial appearances, numerous employee assault cases and felony cases that take priority." When the audit team inquired with JIU investigative staff about the lack of promptness and thoroughness in some of the investigations

	<p>reviewed, JIU investigative staff indicated issues with time restraints due to heavy caseloads and a lack of resources (i.e., County assigned vehicle and cellular telephone). JIU reports there were 63 inmate-on-inmate sexual abuse cases in 2022. Until December 2022, JIU only had one investigator permanently assigned to investigate allegations of inmate-on-inmate sexual abuse referred to JIU for investigation. In December, JIU assigned one additional investigator to investigate PREA-related allegations. The investigators were recently provided one County assigned vehicle and cellular telephones.</p> <p>The audit team noted that substantiated allegations of conduct that appeared to be criminal were referred for prosecution. LASD did not conduct any compelled interviews during these investigations. The Agency demonstrated compliance with provisions (d) and (h) of this standard.</p> <p>As discussed in §115.134, LASD only has two investigators within the Agency that have completed specialized training consistent with the requirements of §115.134. Of the 28 investigations reviewed, only 10 were conducted by an investigator that has received specialized training consistent with the requirements of §115.134. The Agency did not demonstrate compliance with provisions (a) - (c), (e) - (g), and (i) - (j) of this standard.</p> <p>The Agency is not compliant with provisions (a) - (c), (e) - (g), and (i) - (j) of this standard.</p>
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<b>115.172</b>	<b>Evidentiary standard for administrative investigations</b>
	<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p> <p><b>Auditor Discussion</b></p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station's PAQ Information</li> <li>2. LASD, MPP, 3-04/020.25, Administrative Investigation Terminology, Revised December 12, 2013</li> <li>3. Investigative Staff Interviews</li> </ol> <p>115.172</p> <p>The facility indicated in the PAQ that LASD imposes a standard of a preponderance of the evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>LASD, MPP, 3-04/020.25, Administrative Investigation Terminology, is a one-page policy that includes definitions of dispositions for allegations. The policy includes the following definitions:</p>

- Founded - when the investigation reveals that the allegation is true and when the action on the part of the Department members is prohibited by law or Department policy.
- Unfounded - when the investigation establishes by a preponderance of the evidence that the allegation is not true.
- Unresolved - when the investigation fails to resolve the conflict between the complainant's allegation and the Department member's version of the incident; when there is no preponderance of the evidence to support either version of the incident.

The Agency did not provide the audit team with any additional policies regarding this standard for review.

During interviews, investigative staff did not convey a consistent standard required to substantiate allegations of sexual abuse or sexual harassment. One investigator indicated there needed to be more evidence that an incident occurred than not. Another investigator indicated evidence that the incident occurred would be required. When probed, this investigator did not understand the meaning of a preponderance of the evidence. Two investigators indicated they do not make these determinations.

The Agency did not provide the audit team with any proof or documentation to support the standard of proof used in its administrative investigations. Additionally, the audit team was not provided with requested investigative files.

The Agency did not demonstrate compliance with this standard. Corrective Action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.
2. LASD shall provide the audit team with proof of practice to support the standard of proof used in its administrative investigations. This shall include any investigative documentation or files requested by the audit team.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. It is unclear if MPP, 3-04/020.25, Administrative Investigation Terminology, will be revised to include verbiage consistent with the requirements of this standard. However, LASD revised CDM, 3-04/025.45, Disciplinary Measures for Violating PREA Standards, to require that investigators impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. However, this policy was not finalized, implemented, and institutionalized.
2. The proof of practice submitted by LASD did not demonstrate compliance



with this standard. Additionally, two staff-on-inmate sexual harassment investigative files reviewed by the audit team did not include a written report that thoroughly described the investigative steps taken to reach the dispositions. Therefore, the audit team was unable to determine what standard of evidence is imposed by investigators.

The Agency is not compliant with this standard.

**115.176 Disciplinary sanctions for staff**

**Auditor Overall Determination:** Does Not Meet Standard

**Auditor Discussion**

The following evidence was analyzed in making the compliance determination:

1. Lakewood Station’s PAQ Information
2. LASD, CDM, 3-04/025.15, PREA- Criminal and Administrative Investigations
3. LASD, CDM, 3-04/025.45, Disciplinary Measures for Violating PREA Standards, Revised April 13, 2018
4. LASD, MPP, 3-04/020.30, Internal Administrative and Criminal Investigations
5. Guidelines for Discipline Handbook, Dated January 1, 2017
6. Personnel files

115.176 (a)

CDM, 3-04/025.45, Disciplinary Measures for Violating PREA Standards, states “Department personnel shall be subject to disciplinary sanctions, up to and including termination, for violating the Departments sexual abuse and/or sexual harassment policies under the Prison Rape Elimination Act of 2003 (PREA).” The language of this policy is consistent with PREA Standard 115.176 (a). The facility demonstrated compliance with provision (a) of this standard.

115.176 (b)

The standard requires that termination shall be the presumptive disciplinary sanction for staff who engage in sexual abuse. This language is not located in CDM, 3-04/025.45, CDM, 3-04/025.15, or the Guidelines for Discipline Handbook. The Guidelines for Discipline Handbook provides a discipline and education guide for disciplinary options. The chart provides that inappropriate/disorderly conduct relating to sexual misconduct is punishable by three days to discharge. It is recommended that LASD revise CDM, 3-04/025.45, Disciplinary Measures for Violating PREA Standards, to include language that states that termination is the presumptive disciplinary sanction for staff who engage in sexual abuse.

In the PAQ, LASD reported that there were no staff members in the last 12 months

who had violated sexual abuse and sexual harassment policies. The audit team conducted a search of LASD's Performance Recording and Monitoring System (PRMS) to determine if personnel files included any violations involving sexual abuse or sexual harassment. We reviewed personnel files for 20 randomly selected Lakewood Station employees and determined that there were no violations involving sexual abuse or sexual harassment within the past 12 months. The facility did not provide any policy or proof of practice demonstrating that termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. The facility did not demonstrate compliance with provision (b) of this standard.

115.176 (c)

The Guidelines for Discipline Handbook, Decision to Discipline (page 6 of 42), states the imposition of the proper discipline stems from a determination of the facts, an evaluation of whether the facts reflect employee misconduct, an assessment of the significance of the misconduct, and the proper disciplinary action response. The extent of the investigation is determined by the nature and seriousness of the allegations, performance problem, or misconduct involved. It further states that the judgment of whether discipline is appropriate should be based upon several factors, including (1) seriousness of the offense; the impact, actual or potential, upon the Department and/or the community; (2) the length of service and overall performance of the employee; (3) the attitude and culpability of the employee; (4) previous discipline and the length of time since imposed; and (5) harm to the public. The language of the Guidelines for Discipline is general and does not specifically speak to violations of agency policy relating to sexual abuse or sexual harassment. Further, the language does not address sanctions imposed for comparable offenses by other staff with similar history. As such, the facility did not demonstrate compliance with provision (c) of the standard.

In the Pre-Audit Questionnaire (PAQ), LASD reported that there were no staff members from the facility in the last 12 months who have been disciplined, short of termination, for violation of agency sexual abuse or harassment policies (other than engaging in sexual abuse). As stated above, a random sample of 20 employee personnel files were reviewed and there were no incidents found of employees who were disciplined short of termination for violation of agency sexual abuse or sexual harassment policies within the last 12 months.

115.176 (d)

The PAQ indicated that there were no incidents where staff were reported to law enforcement agencies or licensing boards following their termination or resignation. The audit team recognizes that LASD conducts its own investigations in its lockups, but the audit team was unable to locate policy language that addresses reporting to relevant licensing bodies. The Agency did not provide any additional documents and/or proof of practice demonstrating compliance with provision (d) of this standard.

The facility is not compliant with provisions (b)-(d) of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall provide proof of practice that demonstrates termination is the presumptive disciplinary sanction for staff who engage in sexual abuse.
2. LASD shall provide the audit team with proof of practice that staff disciplinary sanctions relating specifically to sexual abuse and sexual harassment that address violations of agency policy (other than engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offences by other staff with similar histories. This shall include records of disciplinary sanctions taken against staff for violations of the agency sexual abuse or sexual harassment policies. LASD shall provide the audit team with proof of practice that terminations for violations of agency sexual abuse and sexual harassment policies, or resignations by staff who have been terminated if not for their resignation, are reported to relevant licensing bodies. This shall include any departmental policy that includes such language, written procedures that describe the current process in place for reporting such conduct to relevant licensing bodies, or samples of such reports.
3. LASD shall provide policy or proof of practice that demonstrates that 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, unless the activity was clearly not criminal, and to any relevant licensing bodies.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. LASD revised CDM, 3-04/025.45, Disciplinary Measures for Violating PREA Standards to include, "[t]ermination shall be the presumptive disciplinary sanction for Department employees, contractors and volunteers who have been found to have substantiated allegations of sexual abuse of an inmate." The policy revision is consistent with Standard provision 115.176 (b). However, the draft policy has not yet been finalized, implemented, or institutionalized.
2. LASD revised CDM, 3-04/025.45 to include language that states, "[d]isciplinary sanctions for sexual abuse or sexual harassment, other than engaging in sexual abuse, shall be commensurate with the nature and circumstances of the acts committed, the personnel's disciplinary history, and the sanctions imposed for comparable offenses by previous personnel with similar histories." The policy revision is also consistent with Standard provision 115.176 (c). However, the draft policy has not yet been finalized, implemented, or institutionalized.
3. LASD further revised CDM, 3-04/025.45 to include language that states, "[d]epartment employees, contractors and volunteers who have been found to have substantiated allegations of sexual abuse of an inmate shall be investigated and reported to the appropriate law enforcement agency and to

relevant licensing bodies such as the Commission on Peace Officers Standards and Training, the State Bar of California, or the Contractor State License Board, unless the activity was clearly not criminal.” The policy revision is also consistent with Standard provision 115.176 (d). However, the draft policy has not been finalized, implemented, or institutionalized.

The Agency is not compliant with provisions (b)-(d) of this standard.

115.177	Corrective action for contractors and volunteers
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. LASD, CDM, 3-04/025.00, Prison Rape Elimination Act of 2003 (PREA) Zero Tolerance Policy, Revised May 20, 2013</li> <li>3. LASD, CDM, 3-04/025.45 Disciplinary Measures for Violating PREA Standards; Contractors and Volunteers, Revised April 3, 2018</li> <li>4. Facility Director Interview</li> </ol> <p>115.177 (a)</p> <p>In the PAQ, LASD reported that there were no reported incidences of sexual abuse that occurred at Lakewood Station involving contractors or volunteers in the last 12 months.</p> <p>CDM, 3-04/025.00, Prison Rape Elimination Act of 2003 (PREA) Zero Tolerance Policy, states that sexual assault shall not be tolerated at any custody facility operated by the Sheriff. Sexual abuse by an employee, vendor, contracted agency, volunteer, inmate or other non-Department member with a business association with the Department, shall be prohibited. No individual, no matter his or her title or position has the authority to commit or allow sexual abuse of inmates. In accordance with California Penal Code section 673, Department personnel are required to care and protect inmates remanded to the custody of the Sheriff. Violation of Penal Code section 673 is a misdemeanor. LASD conducts their own criminal investigations and would not report the sexual assault to an external law enforcement agency. However, the policy fails to include language on reporting sexual abuse to relevant licensing bodies.</p> <p>CDM, 3-04/025.45, Disciplinary Measures for Violating PREA Standards under Contractors and Volunteers, states any contractor or volunteer who is found to have engaged in sexual abuse or sexual harassment of an inmate shall be prohibited from any further contact with inmates. The policy language satisfies the standard</p>

	<p>requirement.</p> <p>115.177 (b)</p> <p>CDM, 3-04/025.45 Disciplinary Measures for Violating PREA Standards, states that any contractor or volunteer who is found to have engaged in sexual abuse or sexual harassment of an inmate shall be prohibited from any further contact with inmates. The PAQ stated that there is no documentation because there have been no contractors or volunteers disciplined. The Facility Director indicated that the contractor would immediately be prohibited from any further contact with detainees. LASD would follow their criminal investigation policies and would refer a substantiated case to District Attorney’s Office for prosecution. As a result, LASD takes appropriate measures to internally investigate a violation of agency sexual abuse or harassment policies involving contractors and volunteers. The Agency is compliant with provision (b) of this standard.</p> <p>Recommended Corrective Action as of October 14, 2022:</p> <ol style="list-style-type: none"> <li>1. LASD shall provide the audit team with proof of practice that any contractor or volunteer who engages in sexual abuse is reported to relevant licensing bodies. This shall include any departmental policy that includes such language, written procedures that describe the current process in place for reporting such conduct to relevant licensing bodies, or samples of such reports.</li> </ol> <p>Implemented Corrective Action as of April 12, 2023, and Final Reporting:</p> <ol style="list-style-type: none"> <li>1. LASD revised CDM, 3-04/025.45, Disciplinary Measures for Violating PREA Standards policy. A draft policy was provided to the audit team for review. The revised language states in part, “Department employees, contractors and volunteers found to have engaged in sexual abuse of an inmate shall be investigated and reported to relevant licensing bodies such as the Commission on Peace Officers Standards and Training, the State Bar of California, or the Contractors State License Board.” However, LASD did not finalize, implement, or institutionalize the revised policy.</li> </ol> <p>The Agency is not complaint with provision (a) of this standard.</p>
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<b>115.178</b>	<b>Referral for prosecution for detainee-on-detainee sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

The following evidence was analyzed in making the compliance determination:

1. Lakewood Station's PAQ Information
2. LASD, CDM, 3-04/025.15, Criminal and Administrative Investigations, Revised April 3, 2022
3. Incident Report and Supplemental Report
4. Facility Director Interview

115.178 (a)

The Agency did not provide the audit team with policy in the PREA Audit System stating that Lakewood Station refers cases to appropriate prosecuting authority when there is probable cause to believe that a detainee was sexually abused by another detainee while in a lockup facility. However, the audit team was able to locate policy that supports this standard. CDM, 3-04/025.15, Criminal and Administrative Investigations, states in part, substantiated allegations of sexual abuse that appear to be criminal shall be referred for prosecution. After an incident of sexual abuse has been referred for prosecution, if any additional interviews are required, investigators shall consult with prosecutors to review if they create an obstacle for subsequent criminal prosecution. The policy language is consistent with this standard.

The PAQ reflects that there have been zero allegations, supported by probable cause, that a detainee sexually abused another detainee in the facility. Thus, there were zero cases referred to an appropriate prosecuting authority. Less than a week before the on-site audit, there was an alleged sexual battery that occurred at the Lakewood Station, which was referred to the Jail Investigations Unit (JIU) for investigation. The audit team received a copy of the Incident Report and Supplemental Report. The case appears to be still under investigation, and at this time it is unknown if the case will be referred for criminal prosecution. The Facility Director indicated that LASD would follow their criminal investigation policies and would refer a substantiated case to the appropriate agency for prosecution.

LASD did not provide the audit team with proof of practice that when there is probable cause to believe that a detainee sexually abused another detainee in a lockup, the Agency refers the matter to the appropriate prosecuting authority.

Additionally, the audit team was not provided with requested agency investigative files for review. The Agency did not demonstrate compliance with provision (a) of this standard.

115.178 (b)

LASD is responsible for all administrative and criminal investigations of allegations of sexual abuse and does not utilize outside agencies to conduct their investigations in its lockups. As such, provision (b) is not applicable.

Recommended Corrective Action as of October 14, 2022:

	<p>1. LASD shall provide the audit team with proof of practice that when there is probable cause to believe that a detainee sexually abused another detainee in a lockup, the Agency refers the matter to the appropriate prosecuting authority. This shall include any investigative files requested by the audit team for review.</p> <p>Implemented Corrective Action as of April 12, 2023, and Final Reporting:</p> <p>1. The sexual abuse allegation that occurred at Lakewood Station one week prior to the on-site audit was submitted by LASD’s Jail Investigative Unit (JIU) to the Los Angeles County District Attorney’s Office for filing consideration. During the corrective action period, the Agency provided additional investigative files for the audit team to review. The audit team determined that when there is probable cause to believe that a detainee sexually abused another detainee, the Agency refers the matter to the appropriate prosecuting authority. On March 29, 2023, the audit team reviewed eight additional JIU investigative files that were referred to the appropriate prosecuting authorities involving inmate on inmate sexual abuse. LASD provided proof of practice and met the requirements of Standard 115.178 (a) during the corrective action period.</p> <p>The Agency is compliant with this standard.</p>
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<b>115.182</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. LASD, CDM, 304/025.20, PREA – First Responder Duties and Coordinated Response Protocol, Revised June 15, 2021</li> <li>2. PREA Allegation Alert</li> <li>3. LASD Incident Report</li> <li>4. Facility Director Interview</li> <li>5. Agency PREA Coordinator Interview</li> <li>6. Random staff Interviews</li> <li>7. Investigative Staff Interview</li> <li>8. Correspondence with Correctional Health Services</li> <li>9. California Penal Code section 13823.95</li> <li>10. The Sexual Assault Survivors’ Right Act of 2016</li> </ol> <p>115.82 (a)</p>

CDM, 3-04/025.20, PREA - Support Services for Inmate Victims of Sexual Abuse, requires all inmate victims of sexual abuse shall be provided with prompt emergency and crisis intervention services from medical and mental health providers, and victim advocates. The Facility Director and the Agency PREA Coordinator reported that access to emergency medical treatment is provided immediately, and detainees are transported to the hospital for a SART examination. Interviews with randomly selected staff all indicated that immediate medical treatment would be provided following a report of sexual abuse. The facility is compliant with provision (a) of this standard.

115.82 (b)

CDM, 3-04/025.20, PREA - Support Services for Inmate Victims of Sexual Abuse, further states that treatment services for victims shall be provided without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. The Facility Director confirmed that there would be no financial cost to the victim for medical services.

California Penal Code section 13823.95 states any costs incurred by a qualified health care professional, hospital, clinic, sexual assault forensic examination team, or other emergency medical facility for a medical evidentiary examination of a victim of a sexual assault shall not be charged directly or indirectly to the victim of the assault.

There was one sexual abuse allegation at the Lakewood Station involving detainees that occurred prior to the on-site audit. The audit team reviewed the PREA Allegation Alert and requested a copy of the Incident Report. The Incident Report documents that a SART examination and mental health support services were offered to victims involved in the incident but were declined. Correctional Health Services was contacted to determine if additional medical services were required for the individuals involved in the incident once they were processed at the Inmate Reception Center. It was determined that two of the involved individuals did not require further treatment after being transported to the Inmate Reception Center. However, the third individual involved in the incident was seen and evaluated in Urgent Care upon arrival to the Inmate Reception Center due to the alleged assault. Medical treatment was provided the day after the incident and was free of charge.

Upon interviewing an Internal Criminal Affairs Bureau (ICIB) Investigator, the investigator indicated that they have never in their career known of a victim to pay for any medical services due to a sexual assault and cited The Sexual Assault Survivors' Right Act of 2016 that provides statutory rights for sexual assault survivors, including the right to receive a forensic medical examination at no cost. The facility is compliant with provision (b) of this standard.

<b>115.186</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard



## Auditor Discussion

The following evidence was analyzed in making the compliance determination:

1. Station's PAQ Information
2. LASD, CDM, 3-04/025.25, PREA - Sexual Abuse Incident Review, Revised November 17, 2021
3. LASD, CDM, 3-04/025.00, Prison Rape Elimination Act of 2003 (PREA), Revised May 20, 2013
4. LASD's Sexual Abuse Incident Review and Report Form
5. Agency Head Designee Interview
6. Agency PREA Coordinator Interview
7. Facility Director Interview
8. Incident Review Team Interview

115.186 (a)-(b)

According to information provided by Lakewood Station in the PAQ, the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. The facility indicated in the PAQ that there were zero criminal and/or administrative investigations of sexual abuse completed at the facility in the 12 months preceding the audit. After the PAQ was submitted and prior to the onsite audit, an allegation of sexual abuse was reported at Lakewood Station lockup. The investigation of this allegation is still pending. Therefore, no sexual abuse incident reviews have been conducted for Lakewood Station.

The facility provided two policies regarding incident reviews for the audit team to review. CDM, 3-04/025.25, PREA - Sexual Abuse Incident Review, states a sexual abuse incident review shall be conducted at the conclusion of every sexual abuse investigation, unless the allegation has been determined unfounded. This policy states the review shall ordinarily occur within 30 days of the conclusion of the investigation to identify any recommendations for improvement. This policy also states a Sexual Abuse Incident Review and Report shall be completed for each review and maintained by the PREA Compliance Manager (PCM). CDM, 3-04/025.00, Prison Rape Elimination Act of 2003 (PREA), states the Custody division shall conduct a Sexual Abuse Incident Review as soon as possible after the conclusion of every sexual abuse investigation, unless the allegation has been determined to be unfounded. The audit team noted the timeframe in which the incident review is required to be completed is inconsistent within policies. While one policy states such reviews shall ordinarily occur within 30 days of the conclusion of the investigation, the other policy states the review shall be conducted as soon as possible at the conclusion of the investigation, unless the allegation is determined to be unfounded. LASD should revise CDM, 3-04/025.25, PREA - Sexual Abuse Incident Review and CDM, 3-04/025.00, Prison Rape Elimination Act of 2003 (PREA), so they are consistent with one another.

Interviews with the Agency Head Designee, Agency PREA Coordinator, Facility

Director, and Incident Review Team members indicated an understanding of the purpose and process of sexual abuse incident reviews. However, consistent and institutionalized policies and practices are required to demonstrate compliance with provision (a)-(b) of this standard.

115.186 (c)

According to information provided by Lakewood Station in the PAQ, the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors and investigators.

The facility provided two policies for the audit team to review. CDM, 3-04/025.00, Prison Rape Elimination Act of 2003 (PREA), states the Sexual Abuse Incident Review shall be attended by the following personnel:

- The executive PREA Coordinator
- Concerned facility Commander
- Jail Investigations Unit personnel
- Custody Support Services staff
- Medical and/or mental health practitioners

CDM, 3-04/025.25, Sexual Abuse Incident Review, states the sexual abuse incident shall be reviewed by the following personnel:

- PREA Coordinator (PC)
- Concerned facility's unit Commander and PREA Compliance Manager (PCM)
- Personnel who conducted the investigation, i.e., facility supervisor, Jail Investigation Unit (JIU), Internal Criminal Investigations Bureau (ICIB), etc.
- Correctional Health Services (CHS), medical and mental health personnel
- County Counsel

The audit team noted inconsistencies in the personnel listed in policy as being required to attend Sexual Abuse Incident Reviews. The Facility Director indicated the facility has not completed any incident reviews because there have never been any allegations or completed investigations of sexual abuse at the facility. Interviews with the Agency PREA Coordinator and Incident Review Team members indicate not all personnel listed as being required to attend Sexual Abuse Incident Reviews have attended recent incident reviews for other facilities within the Agency. Consistent and institutionalized policies and practices are needed to demonstrate compliance with provision (c) of this standard.

115.186 (d)-(e)

The Facility Director indicated the facility has not completed any incident reviews because there have never been any allegations or completed investigations of sexual abuse at the facility. Therefore, no reports for Lakewood Station were submitted to the audit team for review. The Facility Director indicated the facility would conduct a sexual abuse incident review at the conclusion of every future

criminal or administrative sexual abuse investigation unless the allegation has been determined to be unfounded.

CDM, 3-04/025.25, PREA – Sexual Abuse Incident Review, states a Sexual Abuse Incident Review and Report shall be completed for each review and maintained by the PREA compliance manager.

The facility provided the audit team with a blank Sexual Abuse Incident Review and Report form. The Facility Director indicated this form would be completed by the Sexual Abuse Incident Review Team during an incident review. The audit team reviewed the form and interviewed incident review team members and noted the incident review team considers the following:

- Whether the allegations or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.
- Whether the incident or allegation was motivated by race, ethnicity, gender identity, lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility.
- Examines the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
- Assess the adequacy of staffing levels that area during different shifts.
- Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.
- Includes a section for corrective action and/or recommendations.

The audit team requested the Agency PREA Coordinator provide incident reports recently completed by other facilities within the Agency to determine if the Agency has a system in place for incident review and ensures their facilities comply with provision (d) of this standard. The audit was provided with one completed Sexual Abuse Incident Review and Report form from another facility within the LASD. The audit team noted the form is a worksheet like document with check boxes and areas for narrative to be included. The form includes points from paragraphs (d)(1)-(d)(5) of this standard. However, the completed form provided for review included minimal narrative and the audit team was unable to ascertain the details or results of the incident review. The Agency did not demonstrate compliance with provisions (d)-(e) of this standard.

The facility/agency is not complaint with all provisions of this standard.

Corrective Action issued October 14, 2022:

1. Lakewood Station shall provide the audit team with any sexual abuse incident review reports that are completed during the corrective action period.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

	<p>1. The pending investigation of sexual abuse at Lakewood Station lockup concluded in December 2022. However, an incident review has not been conducted.</p> <p>The facility is not compliant with all provisions of this standard.</p>
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<b>115.187</b>	<b>Data collection</b>
	<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p> <p><b>Auditor Discussion</b></p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. LASD, CDM, 3-04/025.05, PREA – Sexual Abuse and Sexual Harassment, Revised April 3, 2018</li> <li>3. LASD’s PREA Allegation Alert Guide</li> <li>4. PREA Reports posted on LASD’s Transparency Website (<a href="https://lasd.org/transparency/custodyreports/">https://lasd.org/transparency/custodyreports/</a>)</li> <li>5. Agency PREA Coordinator Interview</li> </ol> <p>115.187 (a)-(d)</p> <p>According to information provided by Lakewood Station in the PAQ, the Agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</p> <p>The audit team was provided with CDM, 3-04/025.05, PREA – Sexual Abuse and Sexual Harassment, and a copy of LASD’s PREA Allegation Alert Guide for review. The policy provides definitions of sexual abuse and sexual harassment. LASD’s PREA Alert Guide is a table that includes directions for inputting a PREA allegation into the Department’s PREA Allegation Alert system.</p> <p>The PAQ referred the audit team to LASD’s Transparency Website for the Agency’s annually aggregated incident-based sexual abuse data. The audit team reviewed the website and noted reports for two quarters, quarter four of 2021 and quarter one of 2022. The audit team noted these reports included data related to the PREA Allegation Alerts, including the number of pending, unfounded, unsubstantiated, and substantiated allegations of sexual abuse. The audit team was not provided with any additional reports or data for review. The Agency did not demonstrate compliance with provisions (a)-(d) of this standard.</p> <p>115.187 (e)</p> <p>According to information provided by Lakewood Station in the PAQ, the facility and</p>

its parent agency, the LASD, do not contract with any private or public entities for the confinement of its detainees. The audit team confirmed with the Facility Director and Agency PREA Coordinator that the facility and agency do not contract with other entities for the confinement of its detainees. Therefore, provision (e) of this standard does not apply.

115.187 (f)

According to information provided by Lakewood Station in the PAQ, the Agency provided the Department of Justice with data from the previous calendar year upon request. However, the audit team's review indicates the Department does not consistently aggregate incident-based sexual abuse data. The Department did not provide completed Surveys of Sexual Victimization to the audit team for review. The Department's transparency website only included reports for two quarters and no additional reports were provided to the audit team for review. The Agency did not demonstrate compliance with provision (f) of this standard.

The Agency is not compliant with provisions (a) through (d) and (f) of this standard. Corrective action is recommended.

Recommended Corrective Action as of October 14, 2022:

1. LASD shall collect accurate, uniform data for every allegation of sexual abuse at lockups under its direct control using a standardized instrument and set of definitions. The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Local Jail Jurisdictions Survey of Sexual Violence conducted by the Department of Justice, or any subsequent form developed by the Department of Justice and designated for lockups.
2. LASD shall aggregate the incident-based sexual abuse data at least annually. LASD shall provide the Department of Justice with such data from the previous calendar year upon request.

Implemented Corrective Action as of April 12, 2023, and Final Reporting:

1. The audit team confirmed LASD utilizes a standardized set of definitions and instrument to collect uniform data for every allegation of sexual abuse occurring at its custody facilities. The audit team reviewed the LASD's PREA Allegation Alert database and noted it includes the data necessary to answer all questions from the most recent version of the Local Jail Jurisdictions Survey of Sexual Violence conducted by the Department of Justice. LASD provided a copy of the survey submitted for calendar year 2021. The Agency demonstrated compliance with provisions (a), (c), and (d).
2. LASD updated their transparency website to include data for quarter two of 2021 through quarter one of 2023. LASD provided a draft of LASD's 2022 PREA Annual Report. However, LASD did not finalize the report.

The Agency is not compliant with provisions (b) and (f) of this provision.

<b>115.188</b>	<b>Data review for corrective action</b>
	<p data-bbox="280 188 1104 221"><b>Auditor Overall Determination:</b> Does Not Meet Standard</p> <hr/> <p data-bbox="280 266 564 300"><b>Auditor Discussion</b></p> <p data-bbox="280 344 1398 378">The following evidence was analyzed in making the compliance determination:</p> <ol data-bbox="341 445 1398 602" style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. PREA Reports posted on LASD’s Transparency Website (<a href="https://lasd.org/transparency/custodyreports/">https://lasd.org/transparency/custodyreports/</a>)</li> <li>3. Agency PREA Coordinator Interview</li> </ol> <p data-bbox="280 647 497 680">115.188 (a)-(d)</p> <p data-bbox="280 725 1469 994">This standard correlates to standard 115.187. As indicated for standard 115.187, LASD does not consistently aggregate incident-based sexual abuse data. Therefore, LASD cannot be complaint with this standard. LASD did not demonstrate that uniform data, using a standardized instrument and definitions, was collected during the 12 months preceding the audit. The Agency PREA Coordinator indicated the agency is currently working on compiling an annual report. The Agency did not demonstrate compliance with provisions (a)-(d) of this standard.</p> <p data-bbox="280 1039 1469 1106">The Agency is not compliant with all provisions of this standard. Corrective action is recommended.</p> <p data-bbox="280 1151 1086 1184">Recommended Corrective Action as of October 14, 2022:</p> <ol data-bbox="341 1252 1477 1834" style="list-style-type: none"> <li>1. LASD shall review data collected and aggregated pursuant to standard 115.187 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas, taking corrective action on an ongoing basis, and preparing an annual report of its findings and corrective actions for each lockup, as well as the Agency as a whole.</li> <li>2. LASD’s annual report shall include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of the Agency’s progress in addressing sexual abuse. The report shall be approved by the Agency Head and made available through LASD’s website. LASD may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a lockup. However, LASD must indicate the nature of the material redacted.</li> </ol> <p data-bbox="280 1879 1307 1912">Implemented Corrective Action as of April 12, 2023, and Final Reporting:</p> <ol data-bbox="341 1980 1422 2047" style="list-style-type: none"> <li>1. LASD provided a draft of LASD’s 2022 PREA Annual Report. LASD did not finalize the report.</li> </ol>

	The Agency is not compliant with all provisions of this standard.
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115.189	Data storage, publication, and destruction
	<p><b>Auditor Overall Determination:</b> Does Not Meet Standard</p> <p><b>Auditor Discussion</b></p> <p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. Lakewood Station’s PAQ Information</li> <li>2. PREA Reports posted on LASD’s Transparency Website (<a href="https://lasd.org/transparency/custodyreports/">https://lasd.org/transparency/custodyreports/</a>)</li> <li>3. Agency PREA Coordinator Interview</li> </ol> <p>115.189 (a)-(c)</p> <p>This standard correlates to Standard 115.187. As indicated for standard 115.187, LASD does not consistently aggregate incident-based sexual abuse data. Therefore, LASD cannot be complaint with this standard. LASD did not demonstrate that uniform data, using a standardized instrument and definitions, was collected during the 12 months preceding the audit. The Agency PREA Coordinator indicated the agency is currently working on compiling an annual report. The Agency did not demonstrate compliance with provisions (a)-(c) of this standard.</p> <p>The Agency is not compliant with all provisions of this standard. Corrective action is recommended.</p> <p>Recommended Corrective Action as of October 14, 2022:</p> <ol style="list-style-type: none"> <li>1. LASD shall implement a secure system for retention of data collected pursuant to Standard 115.187.</li> <li>2. LASD shall make all aggregated sexual abuse data, from lockups under its direct control, readily available to the public at least annually through its website. Prior to making any aggregated sexual abuse data publicly available, LASD shall remove all personal identifiers.</li> <li>3. The Agency shall maintain sexual abuse data collected pursuant to §115.187 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</li> </ol> <p>Implemented Corrective Action as of April 12, 2023, and Final Reporting:</p> <ol style="list-style-type: none"> <li>1. The audit team confirmed LASD utilizes the PREA Allegation Alert database to collect uniform data for every allegation of sexual abuse occurring at its custody facilities. The Allegation Alert database is securely retained in</li> </ol>

	<p>SharePoint, a browser-based application. The PREA Alert database is only accessible to individuals that are granted access. LASD demonstrated compliance with provision (a) of this standard.</p> <p>2. LASD provided a draft of LASD’s 2022 PREA Annual Report. However, LASD did not finalize the report. LASD did not demonstrate compliance with provisions (b)-(d) if this standard.</p> <p>The Agency is not complaint with provisions (b)-(d) of this standard.</p>
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<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Does Not Meet Standard
	<b>Auditor Discussion</b>
	<p>The following evidence was analyzed in making the compliance determination:</p> <ol style="list-style-type: none"> <li>1. The Agency’s website</li> <li>2. Information from the Agency PREA Coordinator</li> <li>3. Random Staff Interviews</li> <li>4. Informal conversations with staff and observations made during the site review</li> </ol> <p>115.401 (a)</p> <p>This is the first audit for Lakewood Station.</p> <p>115.401 (b)</p> <p>This is the first audit for Lakewood Station.</p> <p>115.401 (h)</p> <p>During the onsite phase of the audit, the audit team was given access to, and observed, all areas of Lakewood Station. The agency/facility is compliant with provision (h) of this standard.</p> <p>115.401 (i)</p> <p>During the corrective action period, the audit team was provided with requested documentation and information required to perform a complete evaluation related to PREA standards. The agency/facility is compliant with provision (i) of this standard.</p> <p>115.401 (m)</p> <p>During the onsite phase of the audit, the audit team requested to interview a total</p>



	<p>of 10 detainees. Lakewood Station ensured privacy for the audit team to conduct these interviews. The agency/facility is compliant with provision (m) of this standard.</p> <p>115.401 (n)</p> <p>The Agency PREA Coordinator notified the audit team that audit notices had been posted through the facility beginning on July 20, 2022. On July 22, 2022, the Lead Auditor visited Lakewood Station and verified the audit notices were posted. Prior to the onsite audit, the audit team did not receive any correspondence from inmates or staff. During the onsite audit, staff indicated detainees are never provided with writing instruments and are not allowed to send mail. Staff indicated inmate workers have mail privileges. During the corrective action period, LASD created a training for staff on how to handle and process legal mail, and direction on providing detainees with pencils, paper, and envelopes. However, LASD did not finalize, implement, train, and institutionalize the new process. The agency/facility is not compliant with provision (n) of this standard.</p> <p>The Agency/facility has not met the requirements of Standard 115.401 (n) during the corrective action period.</p>
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<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	LASD does not have any final audit reports. Therefore, this standard is not applicable.

<b>Appendix: Provision Findings</b>		
<b>115.111 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	no
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	no
<b>115.111 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	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 lockups?	no
<b>115.112 (a)</b>	<b>Contracting with other entities for the confinement of detainees</b>	
	If this agency is law enforcement and it contracts for the confinement of its lockup detainees in lockups operated by private agencies or other entities, including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the law enforcement agency does not contract with private agencies or other entities for the confinement of detainees.)	na
<b>115.112 (b)</b>	<b>Contracting with other entities for the confinement of detainees</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 law enforcement agency does not contract with private agencies or other entities for the confinement of detainees OR the response to 115.112(a)-1 is "NO".)	na
<b>115.113 (a)</b>	<b>Supervision and monitoring</b>	

	Does the agency ensure that it has developed for each lockup a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect detainees against sexual abuse?	no
	Does the agency ensure that it has documented for each lockup a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect detainees against sexual abuse?	no
	Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The physical layout of each lockup?	no
	Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the detainee population?	no
	Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	no
	Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	no
<b>115.113 (b)</b>	<b>Supervision and monitoring</b>	
	In circumstances where the staffing plan is not complied with, does the lockup document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	no
<b>115.113 (c)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: 1. The staffing plan established pursuant to paragraph (a) of this section?	no
	In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	no
	In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: The lockup's	no

	deployment of video monitoring systems and other monitoring technologies?	
	In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to: The resources the lockup has available to commit to ensure adequate staffing levels?	no
<b>115.113 (d)</b>	<b>Supervision and monitoring</b>	
	If vulnerable detainees are identified pursuant to the screening required by § 115.141, does security staff provide such detainees with heightened protection, to include: Continuous direct sight and sound supervision?	no
	If vulnerable detainees are identified pursuant to the screening required by § 115.141, does security staff provide such detainees with heightened protection, to include: Single-cell housing or placement in a cell actively monitored on video by a staff member sufficiently proximate to intervene, unless no such option is determined to be feasible?	no
<b>115.114 (a)</b>	<b>Juveniles and youthful detainees</b>	
	Are juveniles and youthful detainees held separately from adult detainees? (N/A if the facility does not hold juveniles or youthful detainees (detainees <18 years old).)	yes
<b>115.115 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the lockup always refrain from conducting any cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.115 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the lockup document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
<b>115.115 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the lockup implement policies and procedures that enable detainees to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent	no

	circumstances or when such viewing is incidental to routine cell checks?	
	Does the lockup require staff of the opposite gender to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing?	no
<b>115.115 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the lockup always refrain from searching or physically examining transgender or intersex detainees for the sole purpose of determining the detainee's genital status?	yes
	If a detainee's genital status is unknown, does the lockup determine genital status during conversations with the detainee, 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
<b>115.115 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the agency train law enforcement 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
	Does the agency train law enforcement staff in how to conduct searches of transgender and intersex detainees in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	no
<b>115.116 (a)</b>	<b>Detainees with disabilities and detainees who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that detainees 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: Detainees who are deaf or hard of hearing?	no
	Does the agency take appropriate steps to ensure that detainees 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: Detainees who are blind or have low vision?	no

	Does the agency take appropriate steps to ensure that detainees 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: Detainees who have intellectual disabilities?	no
	Does the agency take appropriate steps to ensure that detainees 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: Detainees who have psychiatric disabilities?	no
	Does the agency take appropriate steps to ensure that detainees 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: Detainees who have speech disabilities?	no
	Does the agency take appropriate steps to ensure that detainees 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 the overall determination notes.)	no
	Do such steps include, when necessary, ensuring effective communication with detainees who are deaf or hard of hearing?	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?	no
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees who: Have intellectual disabilities?	no
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees who: Have limited reading skills?	no
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees who: are blind or have low vision?	no
<b>115.116</b>	<b>Detainees with disabilities and detainees who are limited</b>	

<b>(b)</b>	<b>English proficient</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 detainees who are limited English proficient?	no
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	no
<b>115.116 (c)</b>	<b>Detainees with disabilities and detainees who are limited English proficient</b>	
	Does the agency always refrain from relying on detainee interpreters, detainee readers, or other types of detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety, the performance of first-response duties under §115.164, or the investigation of the detainee's allegations?	no
<b>115.117 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with detainees 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
	Does the agency prohibit the hiring or promotion of anyone who may have contact with detainees 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
	Does the agency prohibit the hiring or promotion of anyone who may have contact with detainees who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with detainees who: o 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
	Does the agency prohibit the enlistment of services of any contractor who may have contact with detainees who: Has been	yes

	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?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with detainees who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
<b>115.117 (b)</b>	<b>Hiring and promotion decisions</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 detainees?	yes
<b>115.117 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with detainees, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with detainees, 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
<b>115.117 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with detainees?	yes
<b>115.117 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with detainees or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.117 (f)</b>	<b>Hiring and promotion decisions</b>	



	Does the agency ask all applicants and employees who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with detainees 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
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.117 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.117 (h)</b>	<b>Hiring and promotion decisions</b>	
	Unless prohibited by law, 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
<b>115.118 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new lockup or planned any substantial expansion or modification of existing lockups, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect detainees 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.)	na
<b>115.118 (b)</b>	<b>Upgrades to facilities and technologies</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	no

	agency's ability to protect detainees 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.)	
<b>115.121 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse in its lockups, 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.)	no
<b>115.121 (b)</b>	<b>Evidence protocol and forensic medical examinations</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.)	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. )	no
<b>115.121 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes

	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
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.121 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the detainee is transported for a forensic examination to an outside hospital that offers victim advocacy services, does the agency permit the detainee to use such services to the extent available, consistent with security needs?	yes
<b>115.121 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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 any form of criminal or administrative sexual abuse investigations.)	na
<b>115.122 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	no
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	no
<b>115.122 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If another law enforcement agency is responsible for conducting investigations of allegations of sexual abuse and sexual harassment in its lockups, does the agency have a policy in place to ensure that such allegations are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? (N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).)	na

	Has the agency published such policy, including a description of responsibilities of both the agency and the investigating entity, on its website or, if it does not have one, made the policy available through other means? (N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).)	na
	Does the agency document all such referrals? (N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).)	na
<b>115.131 (a)</b>	<b>Employee and volunteer training</b>	
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: Its zero-tolerance policy and detainees' right to be free from sexual abuse and sexual harassment?	no
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: The dynamics of sexual abuse and sexual harassment in confinement, including which detainees are most vulnerable in lockup settings?	no
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: The right of detainees and employees to be free from retaliation for reporting sexual abuse or harassment?	no
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to detect and respond to signs of threatened and actual sexual abuse?	no
	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to communicate effectively and professionally with all detainees?	no

	Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	no
<b>115.131 (b)</b>	<b>Employee and volunteer training</b>	
	Have all current employees and volunteers who may have contact with detainees received such training?	no
	Does the agency provide each employee and volunteer with annual refresher information to ensure that they know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
<b>115.131 (c)</b>	<b>Employee and volunteer training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.132 (a)</b>	<b>Detainee, contractor, and inmate worker notification of the agency's zero-tolerance policy</b>	
	During the intake process, do employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	no
<b>115.132 (b)</b>	<b>Detainee, contractor, and inmate worker notification of the agency's zero-tolerance policy</b>	
	Does the agency ensure that, upon entering the lockup, all contractors and any inmates who work in the lockup are informed of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
<b>115.134 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees and volunteers pursuant to §115.131, 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	no

	conduct any form of administrative or criminal sexual abuse investigations. See 115.121(a.)	
<b>115.134 (b)</b>	<b>Specialized training: Investigations</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 115.121(a).)	no
	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 115.121(a).)	no
	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 115.121(a).)	no
	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 115.121(a).)	no
<b>115.134 (c)</b>	<b>Specialized training: Investigations</b>	
	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 115.121(a).)	no
<b>115.141 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	If the lockup is not utilized to house detainees overnight, before placing any detainees together in a holding cell do staff consider whether, based on the information before them, a detainee may be at a high risk of being sexually abused? (N/A if the lockup is utilized to house detainees overnight.)	na
	When appropriate, do staff take necessary steps to mitigate such danger to the detainee? (N/A if the lockup is utilized to house detainees overnight.)	na
<b>115.141</b>	<b>Screening for risk of victimization and abusiveness</b>	

<b>(b)</b>		
	If the lockup is utilized to house detainees overnight, are all detainees screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees? (N/A if lockup is NOT used to house detainees overnight.)	no
<b>115.141 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In lockups described in paragraph (b) of this section, do staff always ask the detainee about his or her own perception of vulnerability? (N/A if lockup is NOT used to house detainees overnight.)	no
<b>115.141 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: Whether the detainee has a mental, physical, or developmental disability. (N/A if lockup is NOT used to house detainees overnight.)	no
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The age of the detainee? (N/A if lockup is NOT used to house detainees overnight.)	no
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The physical build and appearance of the detainee? (N/A if lockup is NOT used to house detainees overnight.)	no
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: Whether the detainee has previously been incarcerated? (N/A if lockup is NOT used to house detainees overnight.)	no
	Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The nature of the detainee's alleged offense	no

	and criminal history? (N/A if lockup is NOT used to house detainees overnight.)	
<b>115.151 (a)</b>	<b>Detainee reporting</b>	
	Does the agency provide multiple ways for detainees to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple ways for detainees to privately report: Retaliation by other detainees or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple ways for detainees to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	no
<b>115.151 (b)</b>	<b>Detainee reporting</b>	
	Does the agency also provide at least one way for idetainees to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that entity or office able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the detainee to remain anonymous upon request?	yes
<b>115.151 (c)</b>	<b>Detainee reporting</b>	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	no
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment ?	yes
<b>115.151 (d)</b>	<b>Detainee reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of detainees?	yes
<b>115.154 (a)</b>	<b>Third-party reporting</b>	



	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment in its lockups?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a detainee?	yes
<b>115.161 (a)</b>	<b>Staff and agency reporting duties</b>	
	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 an agency lockup?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against detainees or staff who reported such an incident?	yes
	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?	no
<b>115.161 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, do 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, and investigation decisions?	yes
<b>115.161 (c)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.161 (d)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency report all allegations of sexual abuse, including third-party and anonymous reports, to the agency's designated investigators?	yes
<b>115.162</b>	<b>Agency protection duties</b>	

<b>(a)</b>		
	When the agency learns that a detainee is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the detainee?	no
<b>115.163 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that a detainee 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?	no
<b>115.163 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.163 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.163 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.164 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement 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
	Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement 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,	no

	defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	
	Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement 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?	no
<b>115.164 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a law enforcement staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify law enforcement staff?	no
<b>115.165 (a)</b>	<b>Coordinated response</b>	
	Has the agency 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 a lockup incident of sexual abuse?	no
	If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law and unless the victim requests otherwise, inform the receiving facility of the incident and the victim's potential need for medical or social services?	no
<b>115.165 (b)</b>	<b>Coordinated response</b>	
	If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law, inform the receiving facility of the incident unless the victim requests otherwise? (N/A if the agency is not permitted by law to inform a receiving facility, where a victim is transferred from the lockup to a jail, prison, or medical facility as a result of an allegation of sexual abuse of the incident and the victim's potential need for medical or social services.)	no
	If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law, inform the	no

	receiving facility of the victim's potential need for medical or social services unless the victim requests otherwise? (N/A if the agency is not permitted by law to inform a receiving facility, where a victim is transferred from the lockup to a jail, prison, or medical facility as a result of an allegation of sexual abuse of the incident and the victim's potential need for medical or social services.)	
<b>115.166 (a)</b>	<b>Preservation of ability to protect detainees from contact with abusers</b>	
	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 detainees pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.167 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff?	no
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	no
<b>115.167 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for detainee victims or abusers, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for detainees or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
<b>115.167 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Monitor the conduct and treatment of detainees or staff who have reported sexual abuse?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Monitor the conduct and treatment of detainees who were reported to have suffered sexual abuse?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Act promptly to remedy any such retaliation?	yes
<b>115.167 (d)</b>	<b>Agency protection against retaliation</b>	
	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
<b>115.171 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	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 115.121(a).)	no
	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 115.121(a).)	no
<b>115.171 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.134?	no
<b>115.171 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	no
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	no
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	no

<b>115.171 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.171 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	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 detainee or staff?	no
	Does the agency investigate allegations of sexual abuse without requiring a detainee who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	no
<b>115.171 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	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?	no
<b>115.171 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	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?	no
<b>115.171 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.171 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.171(f)	no

	and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	
<b>115.171 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the lockup or agency does not provide a basis for terminating an investigation?	no
<b>115.171 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When outside agencies investigate sexual abuse, does the agency 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 115.121(a). )	na
<b>115.172 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	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?	no
<b>115.176 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.176 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	no
<b>115.176 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	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?	no

<b>115.176 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	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: o Law enforcement agencies, unless the activity was clearly not criminal?	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?	no
<b>115.177 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with detainees?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	no
<b>115.177 (b)</b>	<b>Corrective action for contractors and volunteers</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 detainees?	yes
<b>115.178 (a)</b>	<b>Referral for prosecution for detainee-on-detainee sexual abuse</b>	
	When there is probable cause to believe that a detainee sexually abused another detainee in a lockup, does the agency refer the matter to the appropriate prosecuting authority?	yes
<b>115.178 (b)</b>	<b>Referral for prosecution for detainee-on-detainee sexual abuse</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, does the agency inform the investigating entity of this policy? (N/A if the agency/facility is responsible for administrative and criminal investigations. See	na



	115.121(a.)	
<b>115.182 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do detainee victims of sexual abuse in lockups receive timely, unimpeded access to emergency medical treatment?	yes
<b>115.182 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	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
<b>115.186 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the lockup 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
<b>115.186 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	no
<b>115.186 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors and investigators?	yes
<b>115.186 (d)</b>	<b>Sexual abuse incident reviews</b>	
	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?	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 was motivated or otherwise caused by other group dynamics at the lockup?	no
	Does the review team: Examine the area in the lockup where the incident allegedly occurred to assess whether physical barriers in	no

	the area may enable abuse?	
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	no
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	no
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.186(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the lockup head and agency PREA coordinator?	no
<b>115.186 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the lockup implement the recommendations for improvement, or document its reasons for not doing so?	no
<b>115.187 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at lockups under its direct control using a standardized instrument and set of definitions?	yes
<b>115.187 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	no
<b>115.187 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Local Jail Jurisdictions Survey of Sexual Violence conducted by the Department of Justice, or any subsequent form developed by the Department of Justice and designated for lockups?	yes
<b>115.187 (d)</b>	<b>Data collection</b>	
	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

<b>115.187 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its detainees? (N/A if the agency does not contract for the confinement of its detainees.)	na
<b>115.187 (f)</b>	<b>Data collection</b>	
	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.)	no
<b>115.188 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.187 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?	no
	Does the agency review data collected and aggregated pursuant to § 115.187 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?	no
	Does the agency review data collected and aggregated pursuant to § 115.187 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 lockup, as well as the agency as a whole?	no
<b>115.188 (b)</b>	<b>Data review for corrective action</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?	no
<b>115.188 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it	no

	does not have one, through other means?	
<b>115.188 (d)</b>	<b>Data review for corrective action</b>	
	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 lockup?	no
<b>115.189 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.187 are securely retained?	yes
<b>115.189 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from lockups under its direct control and any private agencies 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?	no
<b>115.189 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	no
<b>115.189 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.187 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	no
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	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.)	no
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	

	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	yes
	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.)	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.)	na
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	no
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. 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	na

	single facility agencies, there has never been a Final Audit Report issued.)	
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