

PREA AUDIT REPORT Interim Final
ADULT PRISONS & JAILS

Date of report: 10/1/2020

Auditor Information			
Auditor name: DeShane Reed			
Address: 2760 Fortune Circle E. Ste. #421424; Indianapolis, IN 46241-9998			
Email: drbconsultinggroup@gmail.com			
Telephone number: (501) 777-3102			
Date of facility visit: October 28, 2018 through October 29, 2018			
Facility Information			
Facility name: Correctional Institution 384 Sabana Hoyos			
Facility physical address: Carr # 682. KM. 3.9, Sector Jobales, Sabana Hoyos PR. 00688			
Facility mailing address: (if different from above) PO Box 1673 Sabana Hoyos PR 00688-1673			
Facility telephone number: 1 (787) 333-2270 Ext. 221, 222			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input checked="" type="checkbox"/> X Prison	<input type="checkbox"/> Jail	
Name of facility's Chief Executive Officer: Ana N. Lopez-Perez			
Number of staff assigned to the facility in the last 12 months: 96			
Designed facility capacity: 384			
Current population of facility: 296			
Facility security levels/inmate custody levels: Maximum Security/Custody			
Age range of the population: 18 and above			
Name of PREA Compliance Manager: Juan Perez-Perez		Title: Correctional Officer	
Email address: JPPerez@dcr.pr.gov		Telephone number: 1 (787) 333-2270 ext. 224	
Agency Information			
Name of agency: Department of Correction and Rehabilitation-Puerto Rico			
Governing authority or parent agency: (if applicable) Estado Libre Asociado de PR (Free Associated State of Puerto Rico)			
Physical address: Juan Calaf Avenue, Urb. 3 Nuns, Hato Rey P.R. 00917 (Avenida Juan Calaf, Tres Monjitas, Hato Rey P.R. 00917)			
Mailing address: (if different from above) Section 71308, San Juan, P.R. 00936 (Apartado 71308, San Juan P.R. 00936)			
Telephone number: (787) 273-6464			
Agency Chief Executive Officer			
Name: Erik Y. Rolon Suarez		Title: Secretary	
Email address: erolon@dcr.pr.gov		Telephone number: (787) 273-6464	
Agency-Wide PREA Coordinator			
Name: Sinaira Camacho Heredia		Title: Head of Rehabilitation and Treatment-DOCR	
Email address: scamher@dcr.pr.gov		Telephone number: (787) 273-6464	

AUDIT FINDINGS

NARRATIVE

On October 28, 2018, in coordination and cooperation with the Puerto Rico Department of Correction and Rehabilitation (DCR-PR), USDOJ Certified PREA Auditor DeShane Reed conducted a facility audit of the DCR-PR Arecibo-384 Corrections Institution. The audit commenced with Pre-Audit Briefing meeting (8:30am) consisting of DCR-PR Arecibo-384 Corrections Institution administration and supervisory security staff. In attendance was the following from DCR-PR Arecibo-384 Corrections Institution: Superintendent, PREA Compliance Manager-384, Lieutenant II-384, North Region PREA Manager, Puerto Rico PREA Liaison/Translator, DCR-Puerto Rico PREA Coordinator. The PRE-Audit meeting commenced with introductions, review of the PREA audit schedule and agenda, on-site document requests, lists of inmates for interviewing and a tour of the entire DCR-PR Arecibo-384 Corrections Institution.

The PREA audit (October 28, 2018 to October 29, 2018) commenced with a full tour of DCR-PR Arecibo-384 Corrections Institution multiple open dormitory housing locations, program locations, visitation area, cafeteria, food prep kitchen, library, laundry, showering locations, offices, recreation and educational locations within DCR-PR Arecibo-384 Corrections Institution. After a complete tour and initial on-site documentation review, the PREA Auditor moved into interviewing a selecting a random sample of inmates. A total of 21 inmates were interviewed, with a specific selection focused on the following category of inmates, based on PREA audit requirements: (Inmates with prior victimization, LGBTI, disability, current PREA allegation(s), limited English proficiency, and inmates in segregation). The PREA Audit also consisted of 16 interviews of a random selection of DCR-PR Arecibo-384 Corrections Institution staff including: Arecibo-384 PREA Compliance Manager, Investigation/Retaliation Team, Contractors, Volunteers, Medical/Mental Health Practitioners, Intake and Classification, Contracted Medical Personnel, Psychologist and other DCR-PR Arecibo-384 Corrections Institution specialized staff. The PREA Auditor also reviewed multiple files and physical documents while on-site, which allowed the PREA auditor to verify if DCR-PR Arecibo-384 Corrections Institution was in compliance with PREA facility standards and/or confirm any areas of non-compliance.

On October 28, 2018, the PREA Audit of DCR-PR Arecibo-384 Corrections Institution concluded with a Post-Audit Debriefing. The same representatives from the Pre-Audit Briefing meeting were in attendance. The PREA Auditor shared that the information presented by the auditor within this Post-Audit Debriefing did not depict a final audit reporting. The PREA Auditor continued by sharing several highlights of the DCR-PR Arecibo-384 Corrections Institution. The staff was welcoming and pleasant to the PREA Auditor. Staff seemed to be very positive and eager to learn more about PREA, as well as share their current knowledge of PREA. The open bay housing dormitory was clean and organized. The facility seemed to have limited program options for inmates to participate (due to maximum/high security offender status). The PREA Auditor also thanked DCR-PR Arecibo-384 Corrections Facility for allowing this auditor unimpeded access to the entire facility, through tour, document access, inmate access, and flexibility of interviews. The PREA Auditor also shared any observable areas that were not meeting standards and likely require a Corrective Action.

As it pertains to PREA Physical Plant observations, DCR-PR Arecibo-384 Corrections Institution does not have access to camera use within the facility. The 4 housing locations are open dormitory single level buildings, containing 96 total beds (48 beds each side; separated by separating wall and control room). Though open dormitory posed a clear sight path for Correctional Officers and allowed observation with proper vigilant supervision. Arecibo-384 has 4 buildings containing 8 48-bed open dormitory housing units which consists of general population inmates. One housing unit is a "transitory" housing unit for inmates with medical related issues (requiring containment). The PREA Auditor observed that the locations of the showers had good separating walls to allow for privacy during showers. However, the toilets on each housing unit were separated by a ¾ wall to provide separation between stalls, but inmates could easily be seen due to no doors for privacy in the front of each stall. The inmates created mini-curtains (¾ height) on the front of many toilet stalls to create their own privacy. Additionally, at the time of the visit, the Superintendent informed this PREA Auditor that Arecibo-384 is required to have 111 staff, however staffing was at 70 to supervise inmates. This accounted for the reasons why there was not a staff to physically and consistently monitor each dayroom floor. Arecibo-384 Superintendent further stated that they compensate for this deficiency in staff by conducting more rounds. There's constantly 1 staff in the Control Room to monitor both dayrooms in each housing unit building (96 total inmates; 48 each side) When this PREA Auditor walked into each Control Room on each housing location, there was limited ability for the Control Room officer to see activity on the housing unit's dayroom floor and shower/toilet areas. This lack of proper supervision and limited Control Room visibility in each inmate housing unit could lend itself to potential PREA-related incidents. Additionally, Arecibo-384's library had bookshelves which were suspended from the walls, which created blind spots behind. Furthermore, this PREA Auditor found an office hidden behind the bookshelves. Due to the bookshelves being suspended from the wall, this becomes a blindspot issue and could lend itself to potential PREA-related incidents. Finally, the "Administrative Remedy" (inmate grievance and written reporting box) box was only in the entry hallway, leading towards to the Main Control Room (nearest the visitation area). If an inmate was disallowed access to visitation, the inmate would not have any other location to submit and "Administrative Remedy."

The Post-Audit Debriefing concluded with the Auditor thanking the DCR-PR Arecibo-384 Corrections Institution staff for their cooperation, efficiency and coordination in allowing the audit to move along in an even flow. The PREA Auditor also informed the DCR-PR Arecibo-384 Corrections Institution staff that a PREA Interim Audit report will be submitted 45-60 days from the conclusion of the facility audit.

DESCRIPTION OF FACILITY CHARACTERISTICS

DCR-PR Arecibo-384 Corrections Institution is a 384-inmate capacity Maximum Custody Correctional Institution. DCR-PR Arecibo-384 Corrections Institution houses only male inmates ages 18 and older. According to the facility, they do not house youthful inmates. The physical plant consists of approximately 5 total buildings, 4 of which is housing units and 1 Central building which houses Arecibo-384's main Central Control Room, dining room, kitchen, chapel, classrooms, recreation room, and visitation room. Each of Arecibo-384's four housing units has two 48-bed sleeping locations (side-by-side) separated by a full cemet wall and a Control Room. Inmates are monitored through a rotations of security staff, who are expected to conduct and document "rounds" a minimum of one hour per round. Additionally, supervisory staff are required to conduct unannounced rounds throughout their daily shifts. Additional services and programs provided within the Arecibo-384 Corrections Institution consists of education, vocational training, outdoor recreation, maintenance, and dining hall.

Due to not having no camera technology for video monitoring assistance, DCR-PR Arecibo-384 Corrections Institution rely heavily on staff supervision through sight/sound supervision by Correctional Officers, as well as predictable and random unannounced rounds per shift by Supervisory security staff (Sergeant or higher). To make up for blind spots, DCR-PR Arecibo-384 Corrections Institution relies heavily on consistent, vigilant and unpredictable staff sight and sound supervision. At the time of the PREA Facility Audit, DCR-PR Arecibo-384 Corrections Institution had approximately 70 staff employed, as well as approximately 18 volunteers and contracted individuals who have contact with inmates within their daily roles at DCR-PR Arecibo-384 Corrections Institution. Finally, DCR-PR Arecibo-384 Corrections Institution works in cooperation with the Office of Investigations of the Correctional System (OISC) regarding institution-related PREA Investigations. Arecibo's PREA Investigation Team works in collaboration with Puerto Rico's OISC by gathering institutional evidence, conducting interviews, and retrieving documents relevant to the PREA Investigations.

Finally, DCR-PR Arecibo-384 Corrections Institution's emergency medical services are largely provided by their Medical Center located at DCR-PR Arecibo-384. Arecibo-384 medical services are largely provided through a contractual relationship partnership with "Physicians Correctional Group." "Physicians Correctional Group" provides 24 hour emergency triage services for DCR-PR Arecibo-#384, #216, and #728 Corrections Institutions. Any inmate requiring medical care beyond the scope of "Physicians Correctional Group," is transported to Centro Medical in San Juan, Puerto Rico. Centro Medico's Certified SANE Nurses also conducts any forensic sexual assault medical exams.

SUMMARY OF AUDIT FINDINGS

The PREA site audit of DCR-PR Arecibo-384 Corrections Institution consisted of a comprehensive assessment (October 28, 2018 to October 29, 2018), related to PREA's mission of prevention, detection, responding to instances of sexual abuse/sexual harassment, and the freedom from retaliation when reporting sexual abuse/harassment. The PREA Institution Audit also consisted of assessing the 43 PREA standards. The assessment of the DCR-PR Arecibo-384 Corrections Institution included an exhaustive facility tour, review of electronic and on-site documents, reviewing investigations and retaliation follow-up documentation, comprehensive interviews with inmates, staff, volunteers, and DCR-PR Arecibo-384 Corrections Superintendents.

Based on the audit findings of 43 total PREA Standards, there were 28 PREA Standards in Compliance, 0 PREA Standard which were Non-Applicable, and 15 PREA Standards which were non-compliant and requiring Corrective Action. DCR-PR Arecibo-384 Corrections Institution PREA Standards requiring Corrective Action are as follows: 115.13, 115.15, 115.16, 115.17, 115.32, 115.33, 115.51, 115.53, 115.54, 115.63, 115.67, 115.72, 115.76, 115.78, 115.81. The above-mentioned identified PREA standard areas requiring Corrective Action were either non-existent, in their beginning stages of compliance and require procedural consistency over time to be considered in compliance, or the institution's policy language did not align with the specific PREA standard.

With technical assistance from this PREA Auditor, throughout the Corrective Action period, DCR-PR Arecibo-384 coordinated a plan of action steps to mitigate each *Non-Compliant* Standard area and bring each into *Compliance*. DCR-PR Arecibo-384 was able to successfully adjust/revise their policies and procedures, conduct trainings, and establish a consistency of institutional practices to bring them into compliance with the 43 PREA Standards.

Number of standards exceeded: 0

Number of standards met: 28

Number of standards not met: 15

Number of standards not applicable: 0

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

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

Auditor 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.

This PREA Auditor reviewed pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for Standard 115.11. DCR-PR Arecibo-384 Corrections Facility submitted DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions” as evidence of compliance with PREA Standard 115.11. DCR-PR’s “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions” (VII-A, B, C) states, *“The Nominating Authority will appoint a “PREA Coordinator” who has the authority to implement and oversee the Agency’s efforts in complying with the PREA standards in all correctional institutions. “Regional Compliance Manager” (North, South, and NJJ) will be employees appointed by the Nominating Authority, who have the authority to coordinate efforts in the correctional institutions, for the implementation of the PREA Standards. The Superintendent of each institution appoints a “Compliance Officer” to serve as the institution’s PREA Liaison. The PREA “Compliance Officers” verify that their institution has posters and information leaflets about PREA, ensure that the established protocol is followed when an incident of sexual violence occurs, and notify the Regional Compliance Manager about any allegations or incidents of sexual violence and complete required reports.”*

Also, DCR-PR’s Organizational Chart identified their PREA Coordinator who oversees the DCR-PR’s efforts to comply with PREA standards in all DCR-PR Correctional Institutions.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.11.

Standard 115.12 Contracting with other entities for the confinement of inmates

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

Auditor 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.

According to DCR-PR Arecibo-384 Corrections Facility’s Pre-Audit Questionnaire, the institution does contract with any entities for confinement of its inmates. Arecibo-384 has submitted electronic verification of DCR-PR contracting for the confinement of inmates at Arecibo-384 in the past 12-months.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.12

Standard 115.13 Supervision and monitoring

- Exceeds Standard (substantially exceeds requirement of standard)

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

Auditor 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.

This PREA Auditor reviewed pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for Standard 115.13. This PREA Auditor reviewed DCR-PR’s institution-wide “Policy for Rounds of Supervision; Article VIII” which states, “*Regional Security Director visits their respective institutions twice a month randomly. The Institution’s Superintendent should make rounds throughout their facility and the living quarters twice a week. Chief of Guards should randomly make rounds of the all their respective institution’s living quarters three time a week. The Shift Supervisor is mandated to randomly visit all the living quarters at least once on every shift 7 days a week (plus any situation which is required).*” This PREA Auditor also reviewed “Documents Rounds Logs” submitted through the Pre-Audit Questionnaire’s electronic documentation and while conducting the on-site audit, which verified unannounced rounds of Supervisory Staff. The auditor also was present on site to observe four unannounced rounds conducted by supervisory staff.

However, this PREA Auditor was unclear of the consistency of the minimum and maximum times which could lapse between rounds conducted by non-supervisory security Correctional Officers. This PREA auditor observed documented rounds which were less than 1-hour between documented rounds. This auditor also observed multiple rounds which exceeded 1 hour before the next documented round. This auditor was able to review on-site and discuss DCR-PR Arecibo-384 Corrections Institution’s staffing plan with Arecibo-384 Superintendent and PREA Coordinator. Each shared the mandatory overtime policy currently in place and temporary reassigning of other institution’s staff to address and staffing shortages.

This auditor recommended that due to no camera/video assistance to monitor inmate activity, “Documented Rounds” for non-supervisory security Correctional Officers should be clearly defined. This PREA Auditor also recommended that DCR-PR add a section in their “Policy for Rounds of Supervision” to comply with PREA Standards which states, “*DCR-PR Correctional Institutions prohibit staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility.*” Due to inconsistencies in “Documented Rounds Logs” and Policy Adjustment needed, this PREA auditor concluded this standard was not in compliance with the above-mentioned PREA Standard. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 submitted their adjusted rounds sheets to demonstrate a clearer picture of supervisory unannounced rounds. Additionally, the Department of Correction and Rehabilitation-Puerto Rico (DCR-PR) adjusted their “PREA Standards Regulations” policy to bring Arecibo’s language into alignment with PREA Standard 115.13.

After this auditor’s review of policy adjustments and review of consistency in practice, Arecibo-384 is in compliance with PREA Standard 115.13.

Standard 115.14 Youthful inmates

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.14. DCR-PR Arecibo-384 Corrections PREA Audit Report

Facility also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XVII-Information Gathering) as evidence of compliance with PREA Standard 115.14 which states, “*Keep separate the members of the young adult population from the members of the adult corrections population.*” Additionally, this auditor reviewed classification documentation submitted by Arecibo-384, where youthful inmates were redirected to other DCR-PR institutions which housed youth (under 18 years old) and those institutions which housed young adults (ages 18-21).

Moreover, during the on-site visit, this PREA Auditor did not observe nor reviewed documentation submitted within the “Daily Population Report” (12-month report) that any youthful inmates resided at DCR-PR Arecibo-384 Corrections Facility.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.14

Standard 115.15 Limits to cross-gender viewing and searches

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

Auditor 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.

This PREA Auditor reviewed pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for Standard 115.15. This PREA Auditor reviewed DCR-PR “Administrative Order 2016 Respect and Interaction with the LGBTQ Population” which stated, “*Security personnel should be trained to perform the pat-searches or records the transgender population in a professional manner, and less invasive as possible, without neglecting safety aspects.*” Additionally, “DCR-Administrative Order Procedures” (VIII, Page 8), submitted electronically by Arecibo-384 stated, “*DCR Correctional Officials may not under any circumstance search an inmate solely to determine their sex or genital status. If this is unknown, it can be determined during talks with the inmate or through private medical exams with a medical practitioner.*” Finally, DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions” states, “*Members of the LGBTIN correctional population will have the same opportunities and access to the programs as others. It will be provided with facilities that allow the inmate to provide the same level of security as the rest of the correctional population. Physically examining members of the intersectional or transgender correctional population for the sole purpose of determining their genital status will not be allowed.*”

Though there were sections in various DCR-PR Policies, Administrative Orders, and Documents submitted, the PREA-Standards and its language was not captured in one location. Additionally, during interviews, it was a consensus that staff of opposite gender consistently announces when entering a housing location. However, there were inconsistencies in staff responses regarding procedures and training in cross-gender pat-searches. Furthermore, through inmate interviews, there was consistency in inmates stating that they can shower or use the toilet without being viewed by staff of the opposite gender viewing them (barring exigent security procedures).

This PREA Auditor clearly observed that many pieces of this Standard were present, however the Policies and Procedures were not located in easily accessible locations. All PREA-Related Policies and Procedures should be located together in case needed for reference. Additionally, when interviewed many staff had different responses when asked about Cross-Gender Pat-Search procedures.

This auditor recommended a refresher training of all institutional security staff in Cross-Gender Searches and Transgender Searches. Additionally, all PREA-Related Policies, Regulations, and Procedures should be captured in the submitted DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions” Furthermore, the specific PREA Standard’s 115.15 wording should be utilized in this policy adjustment. Finally, this Auditor also recommended that DCR-PR adjust their policy by adopting specific language from PREA Standard 115.15. This PREA auditor concluded that this standard is not in compliance with PREA Standard 115.15. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 adjusted their Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “*Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions*” to bring Arecibo 384 into alignment with PREA Standard 115.15. DCR-PR also adopted policy language which aligns with PREA Standard 115.15.

After this auditor's review of policy adjustments and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.15.

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

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

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

This PREA Auditor reviewed pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.16. This PREA Auditor reviewed DCR-PR's electronically submitted "Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions" (Guidance and Education for Members of the Correctional Population-Page 17) which stated, "*Members of the correctional population will receive guidance on the Agency's policy of zero tolerance for sexual violence and will sign the Certification of Orientation form on the PREA Law (Annex A), certifying that they understood the educational material. During the admission process, the members of the newly admitted correctional population will be guided on the zero-tolerance policy of the Agency, through written material, video and poster publication in visible places. All information will be provided in English and Spanish. The orientation video will also have a sign language interpreter.*"

Additionally, during this PREA Auditor's interviews with staff and inmates, there was no consistency answers in the institution's response to Limited-Spanish proficient inmates. Most responded that inmates to assist with interpretations. None knew of interpreters available or systems in place to translating. This is not aligned with PREA Standard 115.16, which prohibits the use of inmate interpreters except in limited circumstances.

DCR's "Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions" language did not align with PREA Standard 115.16. This PREA Auditor recommended that DCR-PR adopt language from PREA Standard 115.16. Additionally, this PREA Auditor recommended for DCR-PR consider identifying an interpretive service hotline. "Pacific Interpreters" can be used as resources for LEP inmate translation services. They can be contacted by calling by calling 1(866) 425-0217, then typing in a facility-specific access code and selecting the appropriate language. This PREA auditor concluded that this standard was not in compliance with PREA Standard 115.16. A Corrective Action was required.

During Arecibo-384's Corrective Action period, Arecibo-384 made adjustments to their Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) "*Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions*" to bring Arecibo-384 into alignment with PREA Standard 115.16. Arecibo-384 leadership also shared that their new hiring practices includes targeting prospective candidates who are bilingual. Furthermore, more than 95% of their inmates and staff are Spanish-speaking or Spanish-English bilingual.

After this auditor's review of policy adjustments and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.16.

Standard 115.17 Hiring and promotion decisions

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

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

This PREA Auditor was unable to review pre-audit documentation, due to DCR-PR Arecibo-384 Corrections Facility, submitting no evidence in its electronic folder. This Auditor was also unable to conducted on-site interviews with DCR’s Human Resources personnel, due to DCR-PR’s HR scheduling conflict. Though DCR-PR Arecibo-384 Corrections Facility’s Pre-Audit Questionnaire, stated that DCR-PR’s Hiring and Promotion Policy meets all the components of PREA Standard 115.17, no evidence was available to confirm.

This PREA Auditor, recommended that DCR-PR submit “policy evidence” which has language which aligns with PREA Standard 115.17. This auditor also requested “examples of random employee files” which demonstrates that DCR-PR practice aligns with PREA Standard 115.17. This PREA auditor concluded that Arecibo-384 was not in compliance with PREA Standard 115.17. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 adjusted their Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “*Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions*” to bring Arecibo-384 into alignment with PREA Standard 115.17. DCR-PR also submitted background checks and screening conducted prior to hiring, promoting, contracting, as well as checks completed current staff (within 5 years).

After this auditor’s review of policy adjustments and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.17.

Standard 115.18 Upgrades to facilities and technologies

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

Auditor 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.

This PREA Auditor reviewed documentation submitted by DCR-PR Arecibo-384 Corrections Institution, which showed a solicitation to purchase 16 cameras for Arecibo-384. The date of the solicitation was on July 2016. Additionally, this auditor observed the limited camera use, with access for viewing from Arecibo-384’s Master Control Room.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.18.

Standard 115.21 Evidence protocol and forensic medical examinations

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.21. DCR-PR Arecibo-384 Corrections Facility also submitted the DCR-PR “Rules to Prevent, Detect, Report, and Respond to Violence in Corrections Institutions (Page 24; #5-#6) as evidence of compliance with PREA Standard 115.21 which states, *“If the abuse occurs within a period of 72 hours, to collect the physical evidence, the alleged victim and aggressor to be separated and not to take action to destroy any evidence by: not brushing teeth, changing clothing, urinating, defecating, smoking, drinking or eating.”*

Additionally, while conducting the on-site audit, this Auditor was able interview DCR-PR Arecibo’s Medical Emergency Services contractor “Physicians Correctional Group” Emergency room supervisor (housed in DCR-PR Arecibo-384 Corrections Institution), who provided evidence of Sexual Assault and Forensic Examinations Protocol. Additionally, this PREA Audit interviewed security staff at Arecibo-384. Each staff a had the same or similar response, when asked about the institution’s protocol on obtaining and preserving using evidence when a sexual abuse is alleged.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.21.

Standard 115.22 Policies to ensure referrals of allegations for investigations

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.22. DCR-PR Arecibo-384 Corrections Facility also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIV-Page 27) as evidence of compliance with PREA Standard 115.22 which states, *“All sexual violence complaints and allegations, including those referred by third parties and anonymous, will be subject to administrative investigation. The same will be carried out in an objective, exhaustive manner and within a term of forty-five (45) calendar days. The Office of Investigation of the Correctional System (OISC), will carry out the investigations of the incidents of sexual violence that occurred in the correctional facilities. The investigation process that is detailed in this Regulation, will not be in conflict with the Guide of Norms and Procedure for the Investigations of the OISC, nor with the norm 13.1.2 of the Manual of Norms, Policies and Procedures of the Bureau of Youth Institutions.”*

Additionally, this PREA auditor verified through documentation and an interview the DCR-PR’s PREA Coordinator and PREA Investigation Team that all DCR-PR institutional sexual abuse investigations are assigned to OISC. DCR-PR institution’s investigators team collaboratively works with OICS to gather and evidentiary information to determine conclusion of the sexual abuse allegation.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.22.

Standard 115.31 Employee training

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

- Does Not Meet Standard (requires corrective action)

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.31. DCR-PR Arecibo-384 Corrections Facility also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X-Page 16-18) as evidence of compliance with PREA Standard 115.31 which states, “All officials who have direct contact with members of the correctional population will be trained on the policy of zero tolerance for sexual violence. Officials must comply with their responsibilities as established by PREA. Subsequently, the training will be offered every two (2) years. The training of the officials will consist of and will include the following:

1. Responsibilities and role of personnel in the prevention, detection, report and response procedure of the Agency.
2. The right of members of the correctional population to be free from sexual violence.
3. The right of members of the correctional population and officials to be free from retaliation for reporting allegations or incidents of sexual violence.
4. Dynamics of sexual violence in confinement and the most common reactions of victims of sexual violence.
5. Professional behavior and methods of effective communication with members of the correctional population, including individuals from the LGBTIN community, with some type of impairment by language or race.
6. How to avoid inappropriate relationships with members of the correctional population.
7. Comply with related laws to report incidents of sexual violence to outside authorities and appropriate ways to respond.

Through educational material in the form of booklets, pamphlets, signs and videos, it will be published on the official website of the Department of Correction and Rehabilitation, for use as PREA reference. The training must be signed to be documented by officials, volunteers or contractors, which will show if there was compression of the information they received. The security personnel will receive training in how to perform the searches and records to the members of the correctional population and transgressors of the opposite gender. The registries to members of the correctional population, transgender and intersex transgressors, will be made in the least invasive way possible, respectful and professionally.”

Additionally, this PREA auditor verified through reviewing sign-in sheets submitted electronically, as well as on-site. DCR-PR Arecibo-384 Corrections Institution also submitted a copy of their Power Point training slides to verify training material.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.31.

Standard 115.32 Volunteer and contractor training

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.32. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X-Page 16-18) as evidence of compliance with PREA Standard 115.32 which did not have any policy language related to PREA Standard 115.32.

Additionally, DCR-PR Arecibo-384 Corrections Institution submitted their “Employee Training Guide” as evidence of compliance. However, no sign-in sheets or attendance records were submitted as evidence that employee or volunteer training occurred. This PREA auditor concluded that this standard was not in compliance with PREA Standard 115.32. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 submitted their adjusted Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions” to bring Arecibo-384 into alignment with PREA Standard 115.32. Arecibo-384 also submitted verification of providing PREA training to volunteers and contractors.

After this auditor’s review of policy adjustments and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.32.

Standard 115.33 Inmate education

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.33. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X-D; Page 19) as evidence of compliance with PREA Standard 115.33. The DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X-D; Page 19) did not have all of the necessary language to be concluded as compliant with PREA Standard 115.33. Additionally, this PREA Auditor received copies of completed “Annex A” Inmate Orientation Forms, where inmates signed off certifying their receiving PREA orientation. However, ALL submitted “Annex-A” Inmate Orientation Forms were dated 8/3/2018 and this onsite audit was commenced 10/28/2018.

During onsite inmate and staff interviews it was evident that the PREA practices at Arecibo-384 was in its beginning stages, due to inconsistencies during inmate and staff interviews. More the 90% of the inmates was unable to recall if they received orientation upon arrival to Arecibo-384 or if PREA-related literature was given to them. It was a common response from the inmates that they did not view a video or have an in-person education session regarding their PREA rights and reporting.

This PREA Auditor recommended that DCR-PR adopt similar language from PREA Standard 115.33 in their policy to align with this standard. This auditor also recommended that Arecibo-384 engage in a consistency of Inmate Education practice, over a period, to be considered compliant with PREA Standard 115.33. This PREA auditor concluded that Arecibo-384 is not in compliance with the PREA Standard 115.33. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 submitted their adjusted Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions” to bring Arecibo-384 into alignment with PREA Standard 115.33. Additionally, Arecibo-384 submitted a copy of their inmate training curriculum. This auditor also received Arecibo-384’s PREA-related brochure which all inmates now receive upon their arrival to Arecibo-384.

After this auditor’s review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.33.

Standard 115.34 Specialized training: Investigations

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.34. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X-C; Page 18) as evidence of compliance with PREA Standard 115.34 which states, “All investigators will receive specialized training in the following topics: techniques of interviewing victims of sexual violence in the correctional environment, correct use of the Miranda and Garrity warnings, compilation of evidence in incidents of sexual violence, criteria and evidence necessary to support a case that requires administrative action. A record will be kept of the assistance to the trainings where the signatures of the officials will be evidenced. Physical and mental health professionals who work as regular employees, either full-time or part-time, will be trained in the following topics: how to detect and evaluate signs of sexual violence, how to preserve physical evidence, how to respond effectively and professionally to victims, and procedures to report incidents of sexual violence. The health provider hired by the Department of Correction and Rehabilitation, will be responsible for offering these training to their employees.”

This PREA auditor also verified through onsite interviews with DCR-PR Arecibo-384 institution internal investigation team that Office of Investigation of the Correctional System (OISC) carries out the investigations of the incidents of sexual violence for DCR-PR facilities. This auditor also reviewed 3 random Arecibo-384’s internal investigation team training records while on-site, and verified that their specialized trainings were current, followed DCR-PR’s policy and PREA Standard 115.34.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.34

Standard 115.35 Specialized training: Medical and mental health care

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.35. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X-C; Page 18) as evidence of compliance with PREA Standard 115.35 which states, “Physical and mental health professionals who work as regular employees, either full-time or part-time, will be trained in the following topics: how to detect and evaluate signs of sexual violence, how to preserve physical evidence, how to respond effectively and professionally to victims, and procedures to report incidents of sexual violence. The health provider hired by the Department of Correction and Rehabilitation, will be responsible for offering these training to their employees.” Furthermore, Policy (XIII; Section 5) states, “The company contracted by the Agency to provide health services in the Correctional Institutions will provide medical services to both the victim and the aggressor. All necessary measures will be taken so that qualified personnel in sexual assault (SAFE-Sexual Assault Forensic Examiners / SANE-Sexual Assault Nurse Examiners) provide these services.”

Additionally, this PREA auditor conducted onsite interviews with DCR-PR Corrections Institution contracted Emergency Medical Services Provider (Physicians Correctional Group housed at Arecibo #728) who verified documented medical staff trainings. Moreover, the Emergency Medical Services Supervisor and two random medical practitioners on her team, were able to clearly demonstrate the medical procedures taken when an allegation of sexual abuse occurs, up to sending an inmate to Centro Medical for forensics examinations conducted by a SANE/SAFE practitioner.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.35.

Standard 115.41 Screening for risk of victimization and abusiveness

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.41. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X1; Page 19) as evidence of compliance with PREA Standard 115.41 which states, “*All members of the correctional population will be evaluated by a Correctional Social Worker to determine the risk of being a victim of sexual violence by other members of the correctional population, and / or to determine the risk of being a sexual aggressor of other members of the population. correctional. The process must be completed within a period of seventy-two (72) hours, from the entry into prison of the member of the correctional population. For this procedure, the instrument entitled: Form to Detect Risk of Sexual Violence will be used (Annex B). If necessary, the information obtained will be shared with the Medical Services Area. This ensures that members of the correctional population are properly evaluated and identified, for their safety and provide the necessary support services. The health provider will establish its own procedure protocol.*

Prior placing members of the correctional population together in a detention cell, staff should consider whether, based on the information and findings, a member of the correctional population may be at high risk of being a victim of sexual violence and, if it were the case, adopt the necessary measures to mitigate any danger to the member of the correctional population. The PREA Compliance Manager must be informed in case of having to segregate it.

The interview for the custody classification will include, but not be limited to, the following factors: physical characteristics (conditions and appearance), age, previous assignment in specialized facilities, crime, criminal record and concerns expressed by the member of the correctional population. No member of the correctional population will be sanctioned for refusing to provide information or answer questions.”

Additionally, this PREA auditor verified through onsite interviews with five DCR-PR Arecibo-384 Corrections Institution Social Workers that DCR-PR Arecibo-384 do actively use an objective *Screening for Risk of Sexual Victimization and Abusiveness* tool (Annex B). This auditor also verified that the (Annex B) screening tool contained all the components as identified in PREA Standard 115.41. Additionally, while onsite, this PREA Auditor requested to review 5 random inmate social files and verified that each file had an (Annex B) risk assessment in it.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.41.

Standard 115.42 Use of screening information

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

relevant review period)

- Does Not Meet Standard (requires corrective action)

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.42. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X1-A; Pages 20-21) as evidence of compliance with PREA Standard 115.42 which states, “*After having evaluated all housing alternatives and demonstrating that there are no other means of protection for the member of the victim correctional population, segregation will be used as location. The member of the correctional population must have every possibility of access to programs and services for which he is eligible. The Correctional Social Workers must document every twenty-four (24) hours the reasons why the member of the correctional population will continue in the area of protective custody and certify the services provided. This process must not exceed thirty (30) days.*

If the member of the correctional population is part of the LGBTI community, it will be located and offered the programs according to the individual evaluation. These members of the correctional population will not be classified in the housing units, exclusively because of their gender identification, unless there is a unit of this type designed to protect this population.

The Correction Social Workers will evaluate each case, at least two (2) times a year to identify any threat to their safety that the member of the correctional population has or may have experienced. Members of the LGBTI correctional population will have the same opportunities and access to the programs as others. It will be provided with facilities that allow the inmate to provide the same level of security as the rest of the correctional population.”

This PREA Auditor also verified through onsite interviews with 4 DCR-PR Arecibo-384 Corrections Institution Social Workers. Each Social Worker was able to clearly demonstrate how DCR-PR Arecibo-384 utilizes the (Annex B) risk screening tool to determine placement, housing, programs, etc. Additionally, while onsite, this PREA Auditor reviewed 5 random inmate social files and verified that each file had a risk assessment in it and recommendations regarding housing location and program-type.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.42.

Standard 115.43 Protective custody

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.43. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X1-A; Page 20-21) as evidence of compliance with PREA Standard 115.43 which states, “*After having evaluated all housing alternatives and demonstrating that there are no other means of protection for the member of the victim correctional population, segregation will be used as location. The member of the correctional population must have every possibility of access to programs and services for which he is eligible. The Correctional Social Workers must document every twenty-four (24) hours the reasons why the member of the correctional population will continue in the area of protective custody and certify the services provided. This process must not exceed thirty (30) days.*

If the member of the correctional population is part of the LGBTI community, it will be located and offered the programs according to the individual evaluation. These members of the correctional population will not be classified in the housing units, exclusively because of their gender identification, unless there is a unit of this type designed to protect this population.

The Correction Social Workers will evaluate each case, at least two (2) times a year to identify any threat to their safety that the member of the correctional population has or may have experienced. Members of the LGBTI correctional population will have the same opportunities and access to the programs as others. It will be provided with facilities that allow the inmate to provide the same level of security as the rest of the correctional population.”

This PREA Auditor also interviewed the Superintendent and other supervisory staff, who stated that the use of protective custody is determined by multiple factors and limited. This auditor also viewed the temporary segregation location, which was located across from the Master Control room. This space was open and had large window for observations from Master Control room or any other staff for safety. This auditor verified the same through onsite interviews with DCR-PR Arecibo-384 Correctional Officers. Each shared that DCR-PR Arecibo-384 limits the use of any segregation. Rather each explained that they find alternative housing placement or request for facility relocation. This auditor also interviewed 21 inmates who also verified that they have not been placed in any segregation location/setting while at Arecibo-384.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.43

Standard 115.51 Inmate reporting

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.51. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X and XII; Pages 17, 18, 21, and 22) as evidence of compliance with PREA Standard 115.51. PREA Standard 115.51 states, “*The agency shall provide **multiple** internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff...*” DCR-PR’s policy did not mention any of the above-mentioned PREA language in their policy. DCR-PR’s policy only aligns with a portion of PREA Standard 115.51.

Additionally, while onsite, this PREA Auditor observed and verified through inmate interviews, by testing the phones while onsite, and through correctional staff interviews that inmates are unable to use the telephone on their housing units to report PREA-related incidents free of charge. Each inmate would need to use their own personal phone code and be personally charged for the PREA-related call (phone number posted on wall). Additionally, Arecibo-384’s confidential “Administrative Remedy” box is only located in a breezeway near the Master Control room, which only allows limited access to submit an anonymous written PREA-related incident.

This PREA Auditor recommended that DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X and XII; Pages 17, 18, 21, and 22), adjust their policy to align with PREA Standard 115.51. This auditor also recommended that DCR-PR add aligning language with PREA Standard 115.51 within their own policy, then establish a consistency of practice around such language within the standard. Finally, this auditor recommended that DCR-PR identify a way for inmates to make free calls on the telephones on their housing units report a PREA-related incident or find another clearly defined avenue for inmates to privately to report a PREA incident to a public or private entity that is not a part of the agency. This PREA auditor concluded that Arecibo-384 is not in compliance with PREA Standard 115.51. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 submitted their adjusted Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “*Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions*” to bring Arecibo-384 into alignment with PREA Standard 115.51. Additionally, in DCR-PR adjusted regulations where inmates are made aware that

they have multiple avenues to report a PREA incident. Arecibo-384 also submitted documentation verifying that PREA-related reporting on telephones on housing units are now free calls.

After this auditor's review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.51.

Standard 115.52 Exhaustion of administrative remedies

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.52. DCR-PR Arecibo-384 Corrections Institution also submitted the DCR-PR "Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions and DCR-PR's "Regulation to Manage the Request for Administrative Remedies Filed by Inmates" as evidence of compliance with PREA Standard 115.52.

While onsite this PREA auditor also interviewed the Correctional Security and Supervisory staff, PREA Compliance Manager, both Superintendents, Correctional Social Workers, and inmates. There was a consensus that "Administrative Remedy" procedures are followed when inmates file grievances for sexual abuse. Each understood DCR-PR's administrative procedures to address inmate grievances regarding sexual abuse or sexual harassment. Additionally, each understood that there is no time limit on grievances regarding sexual abuse or sexual harassment.

This PREA Auditor also interviewed 21 inmates and asked about Arecibo-384's grievance procedure. Each inmate was able to clearly share their ability to submit administrative grievances, however several inmates stated that they would like to have more "Administrative Remedy" boxes around the institution. Many inmates stated that many times they attempt to give or share their grievances with a social worker when available.

This PREA Auditor also observed one "Administrative Remedy" box in the breezeway near the Master Control room, in which the Social Workers and Superintendents have sole access.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.52

Standard 115.53 Inmate access to outside confidential support services

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.53. This auditor cannot conclude that Arecibo-384 is compliant with this PREA Standard, due to the only supporting documents submitted was a PREA-related pamphlet in which all inmates receive upon arrival to the institution. However, the pamphlet did not contain information about outside victim advocates or external emotional support resources.

Also, when inmates were interviewed onsite, only 3 out of 21 responded that they had knowledge of outside advocacy and resources for victims of sexual abuse (their information received from another institution). These same interviewed inmates stated that they have not been informed or received education by Arecibo-384 staff, regarding external access to victim’s advocates and external emotional support for victims.

This auditor recommended that DCR-PR establish or submit their policy as evidence to show compliance with PREA Standard 115.53. If, no policy was in place, DCR-PR should adopt language related to PREA Standard 115.53. Additionally, DCR-PR’s Arecibo-384 Institution should develop procedures to properly educate inmates on the rights to access to external victim advocates and external emotional support for victims of sexual abuse. This PREA auditor also recommends that Arecibo-384 identify and establish a “Memorandum of Understanding” with a Community-based victim advocate agency to partner with, to meet compliance with PREA Standard 115.53. This PREA auditor concluded that Arecibo-384 was not in compliance with PREA Standard 115.53. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 submitted their revised Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “*Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions*” to bring Arecibo-384 into alignment with PREA Standard 115.53. Additionally, Arecibo-384 submitted a copy of their inmate training curriculum, which included information about inmate access to internal and external advocacy for emotional support. Finally, DCR-PR PREA Coordinator informed this auditor that due the institutions limited proximity to services, access has been an obstacle. DCR-PR is still attempting to identify and establish a “Memorandum of Understanding” for external emotional support for inmate victims however, in the meanwhile, Arecibo institutions are utilizing their onsite social services providers to provide emotional support.

After this auditor’s review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.53.

Standard 115.54 Third-party reporting

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.54 This auditor cannot conclude that Arecibo-384 is compliant with this PREA Standard, due to no policy presented as evidence within the electronic folder submitted.

During the onsite Audit, this auditor did see an “End the Silence” PREA-related pamphlet in which all inmates receive upon their arrival to the institution. Inside this pamphlet’s HOW TO REPORT section it stated, “*DCR offers multiple ways to report sexual abuse and sexual harassment:*

- Telephone (787) 332-7732
- Email: prea@dcr.pr.gov
- Report to any staff, volunteer, contractor, or medical or mental health staff.
- Submit a grievance or sick call slip

- *Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on your behalf by calling (787) 332-7732*
- *You can also submit a report on someone's behalf, or someone at the facility can report for you using the ways listed here."*

Also, during inmate interviews, all inmates knew that a third party could report sexual abuse or sexual harassment on their behalf. However, Arecibo-384 did not submit any policy as evidence related to "third-party reporting" to review and verify alignment with PREA Standard 115.54. This auditor recommended that DCR-PR establish by adopting similar language to PREA Standard 115.54 -or- submit their current policy for this auditor to review as evidence to show compliance with PREA Standard 115.54. Additionally, DCR-PR's Arecibo-Institution should develop procedures to properly orient inmates on the rights to have third-party report reporting. This PREA auditor concluded that Arecibo-384 was not in compliance with PREA Standard 115.54. A Corrective Action was required.

During Arecibo-CTRA's Corrective Action period, Arecibo-CTRA submitted their adjusted Department of Corrections and Rehabilitation- Puerto Rico (DCR-PR) *Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions* as evidence of alignment with PREA Standard 115.54. Additionally, Arecibo-CTRA submitted a copy of their inmate training curriculum, which included information about third-party reporting of PREA-related incident.

After this auditor's review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-CTRA is in compliance with PREA Standard 115.54.

Standard 115.61 Staff and agency reporting duties

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

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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.61. DCR-PR Arecibo-384 also submitted the DCR-PR "Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIII; Pages 22-23) as evidence of compliance with PREA Standard 115.61 which states, "*Any official or person who comes in knowledge of any allegation or incident of sexual violence will become the Primary Response Person. Once it comes to knowledge and following the chain of command, the following necessary actions will be taken: Report Protocol and Intervention in Incident of Sexual Violence. (See Annex G)*

1. *Protect the victim and preserve the evidence. Keep the area restricted and under continuous observation. The incident of sexual violence must be reported immediately and secure the crime scene until adequate measures can be taken to obtain any evidence. In addition, the victim will be asked if he retains any evidence of sexual assault (dirty bedding, clothing, etc.). All evidence will remain in its original state.*
2. *Notify the Commander Guard of the shift, following the chain of command (Superintendent, Commander, Lieutenant 1, Lieutenant 2 and Sergeant).*
3. *Complete the PREA Incident Initial Notification she. (See Annex C)*
4. *The victim will be separated from the identified aggressor.*
5. *The company contracted by the Agency to provide health services in the Correctional Institutions will provide medical services to both the victim and the aggressor. All necessary measures will be taken so that qualified personnel in sexual assault (SAFE - Sexual Assault Forensic Examiners / SANE - Sexual Assault Nurse Examiners) provide these services.*
6. *If the abuse occurred within a period of time (72 hours), which still allows the collection of physical evidence, ensure that the alleged victim and the aggressor, do not take any action that could destroy physical evidence, including: bathing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating*
7. *The supervisor will notify the incident within twenty-four (24) hours by telephone to the Puerto Rico Police Department.*
8. *The Commander of the Guard will immediately notify the incident to the Superintendent. When the allegation of incident is*

reported in a juvenile institution, the supervisor will give immediate knowledge to the Institutional Head. In both cases, the PREA Compliance Officer will be notified.

- a. *If the incident arises in a protective security institution, it will be transferred to another institution of protective security.*
- b. *If the transfer cannot be made, the Correctional Social Worker technician must submit a daily follow-up report, documenting and justifying the reasons why it could not be relocated, and the and the services provided. This process must not exceed thirty (30) calendar days."*

Additionally, this PREA auditor verified through interviews with correctional staff, medical, volunteers and other support staff that staff PREA reporting duties were aligned with PREA Standard 115.61. Inmate interviews also showed staff's immediate response to PREA-related incident reporting. This auditor also reviewed DCR-PR's Annex C and Annex G forms to determine compliance. Finally, DCR-PR also submitted a copy of their Power Point training slides to verify training material.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.61.

Standard 115.62 Agency protection duties

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

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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.62. DCR-PR Arecibo-384 also submitted the DCR-PR "Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section VIII; Page 13) as evidence of compliance with PREA Standard 115.62 which states, *"The Agency will take the following actions, aimed at preventing any incident of sexual violence in correctional institutions:*

1. *Once it becomes known that a member of the correctional population is at considerable risk, immediate physical, health and support measures will be established to protect the victim.*
2. *Use a human resource plan that provides the appropriate number of staff and supervision through video surveillance to protect members of the correctional population.*
3. *Keep members of the correctional population separated young adults and members of the adult correctional population. 4. Recognize vulnerable people, either because of their sexual gender/orientation, appearance or physical limitation or language. (Refer to Annex B, Form to Detect Risk of Sexual Violence)."*

Additionally, this PREA auditor verified through interviews with correctional staff, medical, volunteers and other support staff that staff PREA reporting duties were aligned with PREA Standard 115.62. Inmate interviews also showed staff's immediate response to PREA-related incident reporting. This auditor also reviewed DCR-PR's Annex C and Annex G forms to determine compliance. Finally, DCR-PR also submitted a copy of their Power Point training slides to verify training material.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.62.

Standard 115.63 Reporting to other confinement facilities

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

- Does Not Meet Standard (requires corrective action)

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.63. DCR-PR Arecibo-384 also submitted the DCR-PR *Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions* (Section X) as evidence of compliance with PREA Standard 115.63. Arecibo-384’s policy did not have any language related to PREA Standard 115.63.

Additionally, DCR-PR Arecibo-384 Corrections Institution did not submit documentation or physical evidence of reporting any PREA-related incidents to other confinement facilities. During interview, the Superintendent was unable to provide evidence of reporting or receiving PREA-related allegations report to Arecibo-384 from other facilities. DCR-PR also previously submitted a copy of their employee Power Point training slides to verify training material, however no verification that any training on reporting to other confinement facilities occurred.

This PREA auditor recommended that clear language is adopted into DCR-PR’s *Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions*, to show compliance with PREA Standard 116.63. This PREA auditor also recommended that staff training, and practice follows their recommended policy adjustment. This PREA auditor concluded that Arecibo-384 was not in compliance with PREA Standard 115.63. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 submitted their adjusted Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “*Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions*” as evidence of alignment with PREA Standard 115.63. Additionally, Arecibo-384 submitted their staff training curriculum, which included procedures for reporting PREA information related to transferred inmates to other facilities.

After this auditor’s review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.63.

Standard 115.64 Staff first responder duties

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

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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.64. DCR-PR Arecibo-384 also submitted the DCR-PR “*Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions* (Section XIII; Pages 22-23) as evidence of compliance with PREA Standard 115.64 which states, “*Any official or person who comes in knowledge of any allegation or incident of sexual violence will become the Primary Response Person. Once it comes to knowledge and following the chain of command, the following necessary actions will be taken: Report Protocol and Intervention in Incident of Sexual Violence. (See Annex G)*

1. *Protect the victim and preserve the evidence. Keep the area restricted and under continuous observation. The incident of sexual violence must be reported immediately and secure the crime scene until adequate measures can be taken to obtain any evidence. In addition, the victim will be asked if he retains any evidence of sexual assault (dirty bedding, clothing, etc.). All evidence will remain in its original state.*
2. *Notify the Commander Guard of the shift, following the chain of command (Superintendent, Commander, Lieutenant 1, Lieutenant*

- 2 and Sergeant).
3. Complete the PREA Incident Initial Notification she. (See Annex C)
 4. The victim will be separated from the identified aggressor.
 5. The company contracted by the Agency to provide health services in the Correctional Institutions will provide medical services to both the victim and the aggressor. All necessary measures will be taken so that qualified personnel in sexual assault (SAFE - Sexual Assault Forensic Examiners / SANE - Sexual Assault Nurse Examiners) provide these services.
 6. If the abuse occurred within a period of time (72 hours), which still allows the collection of physical evidence, ensure that the alleged victim and the aggressor, do not take any action that could destroy physical evidence, including: bathing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating
 7. The supervisor will notify the incident within twenty-four (24) hours by telephone to the Puerto Rico Police Department.
 8. The Commander of the Guard will immediately notify the incident to the Superintendent. When the allegation of incident is reported in a juvenile institution, the supervisor will give immediate knowledge to the Institutional Head. In both cases, the PREA Compliance Officer will be notified.
 - a. If the incident arises in a protective security institution, it will be transferred to another institution of protective security.
 - b. If the transfer cannot be made, the Correctional Social Worker technician must submit a daily follow-up report, documenting and justifying the reasons why it could not be relocated, and the and the services provided. This process must not exceed thirty (30) calendar days.”
 - c. The incident of sexual violence will not be documented in the Institution's Book of News to protect the confidentiality of the victim.
 9. All persons identified as involved in the alleged situation: victim (s), offender (s), witness (s), must complete the PREA Incident Statement form. (See Annex E)
 10. Officials who must complete the PREA Incident Initial Report (Annex C), or the PREA Incident Statement (Annex E), will prepare and submit them before withdrawing from their workday.
 11. If, for a just cause, the official who become in knowledge of the situation does not complete the sheet, PREA Initial Notice of Incident (Annex C), the Supervisor of the official must complete it. It will also write a communication explaining the reasons why the official did not complete the form.
 12. The Superintendent will be responsible for completing the PREA Sexual Violence Incident Institutional Report. (See Annex D) This document will be completed in full and delivered to the PREA Compliance Officer, within a term not exceeding seventy-two (72) hours after having become aware of the incident.
 13. In cases where the supervisor of the shift is involved in the alleged incident, the presence of the PREA Compliance Officer will be required to comply with the established procedures described above (Annex G). In this case, the supervisor has to inhibit the process.
 14. In the event that the alleged allegation arises in a juvenile institution, the actions detailed above shall not conflict with the Referral Protocol of Alleged Maltreatment or Negligence and / or Institutional Negligence established in Chapter 13 of the Policies, Rules and Procedures Manual of the Youth Institutions.

Additionally, this PREA auditor verified through interviews with correctional staff, medical, volunteers and other support staff that staff PREA reporting duties were aligned with PREA Standard 115.64. Inmate interviews also verified staff's immediate response to PREA-related incident reporting. This auditor also reviewed DCR-PR's Annex C and Annex G forms to determine compliance. Finally, DCR-PR also submitted a copy of their Power Point training slides to verify training material.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.64.

Standard 115.65 Coordinated response

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.65. DCR-PR Arecibo-384 also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIII; Pages 22) as evidence of compliance with PREA Standard 115.65 which states, “Any official or person who comes in knowledge of any allegation or incident of sexual violence will become the Primary Response Person. Once it comes to knowledge and following the chain of command, the following necessary actions will be taken: “Report Protocol and Intervention in Incident of Sexual Violence” (See Annex G).

Additionally, this PREA auditor verified through interviews with the PREA Coordinator, PREA Compliance Manager, Superintendents, and Correctional that each level of supervision and security at the institution understands their role and the overall Coordinated Response to a PREA-Related incident. Staff PREA reporting duties and protocol understanding was aligned with PREA Standard 115.65. This auditor also reviewed and received a copy of DCR-PR’s Annex G form to determine compliance. The Annex G form is DCR-PR’s “Sexual Violence Coordinated Response Protocol (visual roadmap)” for all DCR-PR Institutions. Finally, DCR-PR also submitted a copy of their Power Point training slides to verify training material.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.65.

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

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.64. This PREA auditor interviewed with DCR-PR’s PREA Federal Contracts Manager, PREA Coordinator, PREA Compliance Manager, Superintendents, who all stated that their entering into “Collective Bargaining Agreements do not limit DCR-PR Institutions from “the ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted, as stated in PREA Standard 115.66. According to DCR-PR, all “Collective Bargaining Agreements” do not impede DCR-PR Institutions from complying with USDOJ PREA Standards. This auditor was able to review DCR-PR’s (2012-2015) “Collective Bargaining Agreements” submitted electronically, in combination with interview with key DCR-PR personnel to verify compliance.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.66.

Standard 115.67 Agency protection against retaliation

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.67. DCR-PR Arecibo-384 also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section X-Page 15) as evidence of compliance with PREA Standard 115.67 which did not have any policy language related to PREA Standard 115.67.

Only, one sentence of DCR-PR’s Policy refers to “protection from retaliation.” No other places in the DCR-PR *Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions* is there a mention about the agency’s protection against retaliation. Additionally, Arecibo-384 did submit their agency’s PREA Follow-Up Report Form (Annex F) as evidence of compliance. However, this auditor did not review onsite or receive electronic evidence that this form is used consistently as a practice.

This PREA auditor recommended that clear language is adopted into DCR-PR’s “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions, to show compliance with PREA Standard 115.67. This PREA auditor also recommended that staff training, and a consistency of practice follows this recommended policy adjustment. This PREA auditor concluded that Arecibo-384 was not in compliance with PREA Standard 115.67. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 submitted their adjusted Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “*Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions*” as evidence of alignment with PREA Standard 115.67. Additionally, DCR-PR submitted their institution-wide staff training curriculum which included the agency’s protection against retaliation, as well as staff attendance documentation.

After this auditor’s review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.67.

Standard 115.68 Post-allegation protective custody

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.68. DCR-PR Arecibo-384 also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIII-8A) as evidence of compliance with PREA Standard 115.68 which states, “*a) If the incident arises in a protective security institution, it will be transferred to another institution of protective security.*”

- b. If the transfer cannot be made, the Correctional Social Worker technician must submit a daily follow-up report, documenting and justifying the reasons why it could not be relocated, and the services provided. This process must not exceed thirty (30) calendar days.*

This PREA also auditor verified that DCR-PR’s “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIII-8A) which addresses “Post-Allegation Protective Custody” is aligned with their policy (Section X1-A; Page 20-21) which addresses “Protective Custody Protocols for Inmates at high risk for sexual victimization.” DCR-PR’s policy which aligns with PREA Standard 115.43 (Section X1-A; Page 20-21) states, “*After having evaluated all housing alternatives and demonstrating that there are no other means of protection for the member of the victim correctional population, segregation will be used as location. The member*

of the correctional population must have every possibility of access to programs and services for which he is eligible. The Correctional Social Workers must document every twenty-four (24) hours the reasons why the member of the correctional population will continue in the area of protective custody and certify the services provided. This process must not exceed thirty (30) days.

- a. If the member of the correctional population is part of the LGBTI community, it will be located and offered the programs according to the individual evaluation. These members of the correctional population will not be classified in the housing units, exclusively because of their gender identification, unless there is a unit of this type designed to protect this population.
- b. The Correction Social Workers will evaluate each case, at least two (2) times a year to identify any threat to their safety that the member of the correctional population has or may have experienced. Members of the LGBTI correctional population will have the same opportunities and access to the programs as others. It will be provided with facilities that allow the inmate to provide the same level of security as the rest of the correctional population.”

This PREA Auditor also verified through onsite interviews with DCR-PR Arecibo-384 Correctional Officers, Supervisors, and inmate interviews. Each shared that DCR-PR Arecibo-384 Correctional Institution limits the use of any segregation. Rather each explained that they find alternative housing placement or request for facility relocation. This auditor also interviewed inmates who stated that segregation of inmates is seldomly used, and segregating inmates for long periods of time is not a common practice at Arecibo-384.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.68.

Standard 115.71 Criminal and administrative agency investigations

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.71. DCR-PR Arecibo-384 also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIV) as evidence of compliance with PREA Standard 115.71 which states, “All sexual violence complaints and allegations, including those referred by third parties and anonymous, will be subject to administrative investigation. The same will be carried out in an objective, exhaustive manner and within a term of forty-five (45) calendar days.

The Office of Investigation of the Correctional System (OISC), will carry out the investigations of the incidents of sexual violence that occurred in the correctional facilities. The investigation process that is detailed in this Regulation, will not be in conflict with the Guide of Norms and Procedure for the Investigations of the OISC, nor with the norm 13.1.2 of the Manual of Norms, Policies and Procedures of the Bureau of Youth Institutions.

1. All investigative agents working on these investigations must have completed specialized training in investigations of incidents of sexual violence in confinement.
2. Files of completed investigations will be kept digitally in the database of the OISC, while the presumed victimizer member of the correctional population is under the custody of the Agency, and five (5) additional years, after compliance with his sentence. In the case of minors identified as aggressors, the digital file will remain in the OISC until the latter or they have reached the twenty-six (26) years of age.
If the alleged victimizer is an employee of the Agency or its agencies, the digital file will remain in the database of the OISC while employed by the Agency, and five (5) additional years.
3. Secure the physical evidence, and that the electronic surveillance data have been delivered to the corresponding authorities that conduct the criminal investigations.
4. During the administrative investigation the criminal process will be consulted. It will be ensured that the administrative process does not interfere with criminal prosecution.
5. The credibility of the alleged victim, of the suspect or witness, will be assessed individually, and will not be determined by their position (official) or classification (member of the correctional population).

6. No member of the correctional population who alleges sexual violence shall undergo a polygraph examination or other device for the detection of lies as a condition to continue the investigation of the alleged incident.
7. As part of the administrative investigations, the possible commission of negligence or omission in the fulfillment of duty will be considered. This should be documented in the written reports and include a description of the physical, testimonial or circumstantial evidence, the reasoning behind the credibility assessments, fact determinations and conclusions of law. The investigative report should include, among its findings, if the collected evidence in the investigative process of a sexual violence was sustained, unsupported or unfounded.
8. The departure or leave from the employment or the Agency, will not be grounds to close or conclude the investigation.

After the investigation process, the member of the correctional population must be notified about the determination of his allegation. If it was sustained, not sustained or unfounded. In those cases, in which the determination of the complaint has been sustained or not sustained, and it identifies an official as an aggressor, the Agency must inform the victim the following:

1. If the official was relocated from a position to another that does not have contact with the member of the injured correctional population.
2. If the Agency became aware that the official has been charged with a criminal charge related to the situation under investigation.
3. If the Agency is aware that the official has been convicted of related charges.

When the complaint of the member of the correctional population identified as an aggressor to another member of the correctional population, the Agency will inform the alleged victim when:

1. To become in knowledge of the filing of criminal charges against the alleged aggressor.
2. Become aware of the conviction of the alleged aggressor.

All notifications described above must be documented. On the other hand, the obligation of the Agency ends when the member of the victim correctional population fulfills his sentence or dispositive measure or is released by order of the court.”

This PREA auditor verified that DCR-PR’s “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIV) is aligned with their policy (Section X-C; Page 18) which is compliant with PREA Standard 115.34 (“Specialized Training”). This PREA auditor also verified through onsite interviews with DCR-PR Arecibo-384 internal investigation team (who are the institution’s liaison for OISC) that Office of Investigation of the Correctional System (OISC) carries out the investigations of the incidents of sexual violence in all DCR-PR Correctional facilities. This auditor also verified the facility internal investigation training records while on-site.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.71.

Standard 115.72 Evidentiary standard for administrative investigations

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.72. DCR-PR Arecibo-384 Corrections Facility did not submit any electronic evidence for this standard. However, this PREA Auditor reviewed DCR-PR’s “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIV-Investigations), which did not have policy language related to PREA Standard 115.72. Though interviews with Arecibo-384’s Administrative PREA Investigators (OISC) verified that “Preponderance of Evidence” is their standard in determining substantiation in investigations, this auditor was unable to find aligning language written in DCR-PR’s institution-wide policy.

This PREA auditor recommended that DCR-PR adjust their “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions, to align with PREA Standard 115.72. This PREA auditor concluded that Arecibo-384 was not in compliance with

PREA Standard 115.72. A Corrective Action was required.

During Arecibo-384's Corrective Action period, Arecibo-384 submitted their revised Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) "*Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions*" as evidence of alignment with PREA Standard 115.72. Arecibo-384 also submitted updated and signed training documents, as evidence of PREA Investigators receiving training on "Preponderance of Evidence."

After this auditor's review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibi-384 is in compliance with PREA Standard 115.72.

Standard 115.73 Reporting to inmates

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.73. DCR-PR Arecibo-384 also submitted the DCR-PR "Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XIV-8) as evidence of compliance with PREA Standard 115.73 which states, "*After the investigation process, the member of the correctional population must be notified about the determination of his allegation. If it was sustained, not sustained or unfounded. In those cases, in which the determination of the complaint has been sustained or not sustained, and it identifies an official as an aggressor, the Agency must inform the victim the following:*

1. *If the official was relocated from a position to another that does not have contact with the member of the injured correctional population.*
2. *If the Agency became aware that the official has been charged with a criminal charge related to the situation under investigation.*
3. *If the Agency is aware that the official has been convicted of related charges.*

When the complaint of the member of the correctional population identified as an aggressor to another member of the correctional population, the Agency will inform the alleged victim when:

1. *To become in knowledge of the filing of criminal charges against the alleged aggressor.*
2. *Become aware of the conviction of the alleged aggressor.*

All notifications described above must be documented. On the other hand, the obligation of the Agency ends when the member of the victim correctional population fulfills his sentence or dispositive measure or is released by order of the court."

This PREA auditor also verified through onsite interviews with DCR-PR Arecibo-384 facility internal investigation team (who are the institution's liaison for OISC) that at the conclusion of the Office of Investigation of the Correctional System (OISC) investigations of the incidents of sexual violence in all DCR-PR Correctional facilities, alleged victims are notified of their case and it is documented. Further facility PREA Compliance Manager shared with this auditor that, if substantiated, the victim receives further notification of the status of the perpetrator and it is documented. While on site, this auditor verified the two post-investigation documentation to verify compliance.

Finally, this auditor viewed the DCR-PR "Notification Form" used to inform victims of the conclusion/outcome of the investigation.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.73.

Standard 115.76 Disciplinary sanctions for staff

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.76. DCR-PR Arecibo-384 Corrections Institution Facility also submitted the DCR-PR *“Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XV-Discipline)”* as evidence of compliance with PREA Standard 115.76. In reviewing this excerpt from DCR-PR’s *“Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions,”* this auditor concluded that though some of its language aligned with PREA Standard 115.76, DCR-PR’s policy did not contain all the necessary language to confirm compliance with PREA standard 115.76.

Additionally, while onsite, this PREA Auditor interviewed Arecibo-384’s Superintendent to gain insight into disciplinary sanctions for staff PREA violations. Arecibo-384’s Superintendent informed this auditor that disciplinary actions for staff PREA violations range from reassignment, suspension, termination, up to legal action taken. This Superintendent also referred this auditor to DCR-PR’s *“Manual for the Application of Corrective or Disciplinary Measures to Employees of the Department of Correction and Rehabilitation sections 13.2.1 and 13.2.2 of the Policy Manual Standards and Procedures of the Bureau of Youth Institutions”* (as told to refer to in DCR-PR’s policy section XV-Discipline). This manual gave a roadmap of corrective action steps for employee violations and disciplinary actions within *DCR-PR and Bureau of Youth Institutions*.

This PREA Auditor recommended that DCR-PR adjust their policy to align with PREA Standard 115.76. This PREA auditor concluded that Arecibo-384 was not in compliance with the PREA Standard 115.76. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 adjusted their Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) *“Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions”* to bring Arecibo-384 into alignment with PREA Standard 115.76.

After this auditor’s review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.76.

Standard 115.77 Corrective action for contractors and volunteers

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.77. DCR-PR Arecibo-384 Corrections Facility also submitted the DCR-PR *“Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XV-Discipline)”* as evidence of compliance with PREA Standard 115.77 which states, *“Any contractor or volunteer who has been found for engaging in any sexual act, the Agency will take the required measures to ensure that they do not have direct contact with*

members of the correctional population. In addition, termination of the contractual or volunteer relationship will be considered, and criminal charges will be applied. In reviewing this excerpt from DCR-PR's "Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions, this auditor concludes that the language aligns with PREA Standard 115.77.

Additionally, while onsite, this PREA Auditor interviewed Arecibo-384's Superintendent to gain insight into disciplinary sanctions for staff PREA violations. Superintendent informed this auditor that disciplinary action for PREA violations are subject to removal from volunteer or contractual assignments up to legal action taken. This auditor was also referred to DCR-PR's "Manual for the Application of Corrective or Disciplinary Measures to Employees of the Department of Correction and Rehabilitation sections 13.2.1 and 13.2.2 of the Policy Manual Standards and Procedures of the Bureau of Youth Institutions" (as told to refer to in DCR-PR's policy section XV-Discipline). This manual gives a roadmap of corrective action steps for employee, contractor, and volunteer violations, as well as disciplinary actions within DCR-PR and Bureau of Youth Institutions.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.77.

Standard 115.78 Disciplinary sanctions for inmates

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.78. DCR-PR Arecibo-384 Corrections Facility only submitted their DCR-PR "Disciplinary Policy for the Correctional Population" (Page 35) as evidence of compliance with PREA Standard 115.78. Additionally, this PREA auditor reviewed DCR-PR's "Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions" to verify any policy language related to PREA Standard 115.78. This auditor did not find language in both policies which aligned with PREA Standard 115.78.

This PREA auditor recommended that DCR-PR adjust their policy language to align with PREA Standard 115.78. This auditor also recommended that Arecibo-384 train all institution staff in the adjusted policy, then monitor practice over a period to verify consistency. This PREA auditor concluded this standard was not in compliance with PREA Standard 115.78. A Corrective Action was required.

During Arecibo-384's Corrective Action period, Arecibo-728 adjusted their Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) "Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions" to bring Arecibo-384 into alignment with PREA Standard 115.78. DCR-PR PREA Coordinator submitted training documentation as evidence of training.

After this auditor's review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.78.

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

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance

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

The PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.81. This auditor reviewed DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions” (Section X1; Page 19) as evidence of compliance with PREA Standard 115.81. Though some of its language aligned with PREA Standard 115.81, DCR-PR’s policy did not contain all the necessary language to confirm compliance with PREA standard 115.81.

This PREA auditor recommended that DCR-PR adjust their “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions” to include timelines of assessment, follow-up with medical and/or mental health practitioners, and informed consents. These adjustments to verbiage would align Arecibo-384 with PREA Standard 115.81. Additionally, Arecibo-728 should facilitate a training of all medical and mental health staff on adjustments to the policy, as well as monitor their consistency of practice over a period. This PREA auditor concluded this standard was not in compliance with PREA Standard 115.81. A Corrective Action was required.

During Arecibo-384’s Corrective Action period, Arecibo-384 revised their Department of Corrections and Rehabilitation-Puerto Rico (DCR-PR) “Regulations to Prevent, Detect, Report, and Respond to Sexual Violence in the Correctional Institutions” to bring Arecibo-384’s policy into alignment with PREA Standards 115.41 and 115.81. Additionally, DCR-PR PREA Coordinator submitted training verification as evidence of medical training on PREA Standard 115.81 policy adjustments.

After this auditor’s review of policy adjustments, resubmitted documents, and review of consistency in practice, DCR-PR Arecibo-384 is in compliance with PREA Standard 115.81.

Standard 115.82 Access to emergency medical and mental health services

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.82. DCR-PR Arecibo-384 also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XVI-Medical Treatment and Mental Health) as evidence of compliance with PREA Standard 115.82 which states, “Victims and sexual violence offenders will receive immediate access, without restrictions, to emergency medical and psychological treatment. In addition, they will receive crisis intervention services. When an incident of sexual violence occurs, and there are no qualified medical personnel or mental health professionals, the Agency, through the security personnel, will endeavor to refer and transport the member of the correctional population to any hospital medical facility that provides the free services. The services will include: follow-up plan, treatment plan; and when necessary, referred for continuous care. If you are transferred or located in another facility, as well as if you are released, this service must be of equal quality to those of the rest of the community.

In addition, they will receive crisis intervention services. When an incident of sexual violence occurs, and there are no qualified medical personnel or mental health professionals, the Agency, through the security personnel, will endeavor to refer and transport the member of the correctional population to any hospital medical facility that provides the free services. The services will include: follow-up plan, treatment plan; and when necessary, referred for continuous care. If you are transferred or located in another facility, as well as if you are released, this service must be of equal quality to those of the rest of the community.

If the sexual violence is against a female and leads to penetration, the Agency must perform pregnancy tests. If the victim becomes pregnant, the Agency will provide timely and complete information about access to all legal medical services related to pregnancy. Any member of the correctional population who is a victim of sexual violence will be offered screening tests for sexually transmitted diseases. The medical care

and mental health services must be offered by Correctional Health Services Corp., a company hired by the Agency for such purposes. The services will not be conditioned to the cooperation of the victim with any investigation of the incident

All correctional institutions will conduct a mental health assessment to all members of the aggressor correctional population, within sixty (60) days of becoming aware of such history of sexual violence, and offer treatment when deemed appropriate and recommended by a mental health professional

In those cases, reported in juvenile institutions, every offender involved in any incident of sexual violence will receive immediate medical services. The above process will work as long as it does not conflict with the protocol established in Rule 12.1.37 Sexual Assault of the Policy, Rules and Procedures Manual of the Youth Institutions Bureau”

This PREA auditor also verified through onsite interviews with DCR-PR’s contracted “Physician Correctional Group” Psychologist and Emergency Room Supervisor (located at Arecibo-728). Both verified that all alleged inmate victims of sexual abuse receive immediate/unimpeded access to medical treatment, psychological treatment, and contraception education at no cost to the inmate. This auditor also observed the “Physician Correctional Group’s” operations and random patient files (barring confidentiality regulations). Moreover, all inmates interviewed by this auditor verified that medical care/services at DCR-PR Arecibo facilities are highly responsive.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.82.

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

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Institution pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.83. DCR-PR Arecibo-384 also submitted the DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XVI-Medical Treatment and Mental Health) as evidence of compliance with PREA Standard 115.83 which states, “*Victims and sexual violence offenders will receive immediate access, without restrictions, to emergency medical and psychological treatment. In addition, they will receive crisis intervention services. When an incident of sexual violence occurs, and there are no qualified medical personnel or mental health professionals, the Agency, through the security personnel, will endeavor to refer and transport the member of the correctional population to any hospital medical facility that provides the free services. The services will include: follow-up plan, treatment plan; and when necessary, referred for continuous care. If you are transferred or located in another facility, as well as if you are released, this service must be of equal quality to those of the rest of the community.*

In addition, they will receive crisis intervention services. When an incident of sexual violence occurs, and there are no qualified medical personnel or mental health professionals, the Agency, through the security personnel, will endeavor to refer and transport the member of the correctional population to any hospital medical facility that provides the free services. The services will include: follow-up plan, treatment plan; and when necessary, referred for continuous care. If you are transferred or located in another facility, as well as if you are released, this service must be of equal quality to those of the rest of the community.

If the sexual violence is against a female and leads to penetration, the Agency must perform pregnancy tests. If the victim becomes pregnant, the Agency will provide timely and complete information about access to all legal medical services related to pregnancy. Any member of the correctional population who is a victim of sexual violence will be offered screening tests for sexually transmitted diseases. The medical care and mental health services must be offered by Correctional Health Services Corp., a company hired by the Agency for such purposes. The services will not be conditioned to the cooperation of the victim with any investigation of the incident

All correctional institutions will conduct a mental health assessment to all members of the aggressor correctional population, within sixty (60) days of becoming aware of such history of sexual violence, and offer treatment when deemed appropriate and recommended by a mental health professional

In those cases, reported in juvenile institutions, every offender involved in any incident of sexual violence will receive immediate medical services. The above process will work as long as it does not conflict with the protocol established in Rule 12.1.37 Sexual Assault of the

This PREA auditor also verified through onsite interviews with DCR-PR's contracted "Physician Correctional Group" Psychologist and Emergency Room Supervisor (located at Arecibo-728). Both verified that all alleged inmate victims of sexual abuse receive immediate/unimpeded access to medical treatment, psychological treatment, and contraception education at no cost to the inmate. This auditor also observed the "Physician Correctional Group's" operations and random patient files (barring confidentiality regulations). Moreover, all inmates interviewed by this auditor verified that medical care/services at DCR-PR Arecibo facilities were highly responsive.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.83.

Standard 115.86 Sexual abuse incident reviews

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.86. DCR-PR Arecibo-384 Corrections Facility also submitted the DCR-PR *"Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions"* (Section XVII-A-Review Committee) as evidence of compliance with PREA Standard 115.86 which states, *"This Committee will be composed of officials from the area of Security, Programs and Services, Office of Legal Affairs, Office of Correctional System Investigation (OISC), Bureau of Youth Institutions, and medical and mental health professionals. These officials will be people with authority to make decisions. Once the OISC concludes an investigation of sexual violence, a review of this incident will be conducted. Only the allegations that were classified as sustained and not sustained will be reviewed. Revisions must be made within thirty (30) days after the investigation is completed."*

The PREA Incident Review Committee will have the following functions:

- 1. Consider whether the accusation or investigation indicates the need to change the policy or practice to prevent, detect, inform or respond better to incidents of sexual violence*
 - 2. Identify if the incident or allegation was motivated by race, ethnicity, gender identity, LGBTIN status, or the perception of status, gang affiliation or if, on the contrary, it was caused by other dynamics of groups belonging to the correctional population.*
 - 3. Examine the area in which the incident allegedly occurred to determine if the physical barriers in the area allowed the incident to happen.*
 - 4. To observe if the number of officials assigned in that area are enough during the different shifts.*
 - 5. Evaluate if the video surveillance system, provided evidence in the resolution of the alleged facts and contemplate specific recommendations aimed at the best use of this technology for the supervision of members of the correctional population*
 - 6. Prepare a report with the result of the revision detailing the corrective actions to follow.*
 - 7. Direct the report to the Superintendent of the Institution or Institutional Head where the act of sexual violence occurred. The Superintendent or Institutional Head who receives the report will be responsible for applying the corresponding corrective actions."*

DCR-PR's *"Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions,"* language is aligned with PREA Standard 115.86. This PREA auditor also verified through onsite interviews with Arecibo-384's Superintendent, PREA Coordinator, PREA Compliance Manager, and Supervisory Security staff that Arecibo-384 Institution has "Incident Review" team meetings established, where PREA is actively on the agenda and PREA-related prevention/interventions are discussed and documented. This auditor reviewed meeting agendas, data collection reports, as well as institution-specific incident tracking documentation to confirm consistent incident review meetings are occurring.

This PREA auditor concludes Arecibo-384 is in compliance with PREA Standard 115.86.

Standard 115.87 Data collection

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.87. DCR-PR Arecibo-384 Corrections Facility also submitted their DCR-PR *"Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions"* (Section XVII-Information Gathering) as evidence of compliance with PREA Standard 115.87. This auditor verified that the language in DCR-PR's policy aligns with PREA Standard 115.87.

This PREA auditor was able to verify through onsite interviews with DCR-PR's Director of Federal Programs, Arecibo-384's Superintendents, DCR-PR's PREA Coordinator and Arecibo-384's PREA Compliance Manager that DCR-PR make public annual reports (including data) of incidents of sexual violence within its institutions. Each interviewee also stated that the data collected is used at the time of collection to guide decisions to prevent/decrease PREA-related incidents in respective DCR-PR institutions. DCR-PR did submit their 2017 and 2018 Annual PREA-Program report, as well as monthly institution data reporting of PREA incidents (by institution, incident-type, and by gender) for 2016 through 2018.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.87.

Standard 115.88 Data review for corrective action

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

Auditor 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.

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.87. DCR-PR Arecibo-384 Corrections Facility also submitted their DCR-PR *"Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions"* (Section XVII-Information Gathering) as evidence of compliance with PREA Standard 115.88. This auditor verified that the language in DCR-PR's policy aligns with PREA Standard 115.88.

This PREA auditor was able to verify through onsite interviews with DCR-PR's Director of Federal Programs, Arecibo-384's Superintendents, DCR-PR's PREA Coordinator and Arecibo-384's PREA Compliance Manager that DCR-PR make public annual reports (including data) of incidents of sexual violence within its institutions. Each interviewee also stated that the data collected is used at the time of collection to guide decisions to prevent/decrease PREA-related incidents in respective DCR-PR institutions. DCR-PR did submit

their 2017 and 2018 Annual PREA-Program report, as well as monthly institution data reporting of PREA incidents (by institution, incident-type, and by gender) for 2016 through 2018.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.88.

Standard 115.89 Data storage, publication, and destruction

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

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

This PREA Auditor reviewed DCR-PR Arecibo-384 Corrections Facility pre-audit documents submitted via electronic source, conducted on-site interviews, as well as on-site observations to determine compliance for PREA Standard 115.89. DCR-PR Arecibo-384 Corrections Facility also submitted their DCR-PR “Policy to Prevent, Detect, Report, and Respond to Sexual Violence in Correctional Institutions (Section XVII-Information Gathering) as evidence of compliance with PREA Standard 115.89. This auditor verified that the language in DCR-PR’s policy aligns with PREA Standard 115.89.

This PREA auditor was able to verify through onsite interviews with DCR-PR’s Director of Federal Programs, Arecibo-384’s DCR-PR’s PREA Coordinator and Arecibo-384’s Superintendent, and Arecibo-384’s PREA Compliance Manager that DCR-PR make public annual reports (including data) of incidents of sexual violence within its institutions. Each interviewee also stated that the data collected is used at the time of collection to guide decisions to prevent/decrease PREA-related incidents in respective DCR-PR institutions. Additionally, this auditor reviewed DCR-PR collected data from 2008, which served as evidence of data storage for a minimum of 10 years. DCR-PR did submit their 2017 and 2018 Annual PREA-Program report, as well as monthly institution data reporting of PREA incidents (by institution, incident-type, and by gender) for 2016 through 2018.

This PREA auditor concludes that Arecibo-384 is in compliance with PREA Standard 115.89.

AUDITOR CERTIFICATION

I certify that:

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

DeShane Reed, USDOJ Certified PREA Auditor (#P2190)

October 1, 2020

Auditor Signature

Date