

Prison Rape Elimination Act (PREA) Audit Report Juvenile Facilities

Interim Final

Date of Interim Audit Report: N/A

Date of Final Audit Report: May 7, 2021

Auditor Information

Name: Christy Slauson-Vincent

Email: vncntchrsty@gmail.com

Company Name: Click or tap here to enter text.

Mailing Address: 770 County Road 26

City, State, Zip: Roanoke, AL. 36274

Telephone: 706-668-1969

Date of Facility Visit: March 29, 2021

Agency Information

Name of Agency: Clarke County Sheriff's Office

Governing Authority or Parent Agency (If Applicable): Clarke County Commission

Address: 114 Court Street

City, State, Zip: Grove Hill, AL. 36451

Mailing Address: P.O. Box 913

City, State, Zip: Grove Hill, AL. 36451

The Agency Is:

Military

Private for Profit

Private not for Profit

Municipal

County

State

Federal

Agency Website with PREA Information: Click or tap here to enter text.

Agency Chief Executive Officer

Name: Sheriff Ray Norris

Email: raynorris1601@yahoo.com

Telephone: 251-275-4254

Agency-Wide PREA Coordinator

Name: Jennifer Robertson

Email: jnjr98@yahoo.com

Telephone: 251-275-4254

PREA Coordinator Reports to:
Sheriff Ray Norris

Number of Compliance Managers who report to the PREA
Coordinator:
1

Facility Information

Name of Facility: Clarke County Short Term Juvenile Detention Facility

Physical Address: 149 Clarke Street

City, State, Zip: Grove Hill, AL. 36451

Mailing Address: P.O Box 913

City, State, Zip: Grove Hill, AL. 36451

The Facility Is:

Military

Private for Profit

Private not for Profit

Municipal

County

State

Federal

Facility Website with PREA Information: www.clarkecounty.com

Has the facility been accredited within the past 3 years? Yes No

If the facility has been accredited within the past 3 years, select the accrediting organization(s) – select all that apply (N/A if the facility has not been accredited within the past 3 years):

ACA

NCCHC

CALEA

Other (please name or describe: [Click or tap here to enter text.](#))

N/A

If the facility has completed any internal or external audits other than those that resulted in accreditation, please describe:
[Click or tap here to enter text.](#)

Facility Administrator/Superintendent/Director

Name: Jennifer Robertson

Email: jnjr98@gmail.com

Telephone: 251-275-4254

Facility PREA Compliance Manager

Name: Renee Davis

Email: reneechapman2005@yahoo.com

Telephone: 251-275-8132

Facility Health Service Administrator N/A

Name: QCHC, Inc.

Email: NA

Telephone: 251-275-8132

Facility Characteristics

Designated Facility Capacity:

2

Current Population of Facility:	0
Average daily population for the past 12 months:	1
Has the facility been over capacity at any point in the past 12 months?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Which population(s) does the facility hold?	<input type="checkbox"/> Females <input type="checkbox"/> Males <input checked="" type="checkbox"/> Both Females and Males
Age range of population:	13-17
Average length of stay or time under supervision	72 hours or less
Facility security levels/resident custody levels	minimum
Number of residents admitted to facility during the past 12 months	3
Number of residents admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more:	0
Number of residents admitted to facility during the past 12 months whose length of stay in the facility was for 10 days or more:	0
Does the audited facility hold residents for one or more other agencies (e.g. a State correctional agency, U.S. Marshals Service, Bureau of Prisons, U.S. Immigration and Customs Enforcement)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Select all other agencies for which the audited facility holds residents: Select all that apply (N/A if the audited facility does not hold residents for any other agency or agencies):	<input type="checkbox"/> Federal Bureau of Prisons <input type="checkbox"/> U.S. Marshals Service <input type="checkbox"/> U.S. Immigration and Customs Enforcement <input type="checkbox"/> Bureau of Indian Affairs <input type="checkbox"/> U.S. Military branch <input type="checkbox"/> State or Territorial correctional agency <input type="checkbox"/> County correctional or detention agency <input type="checkbox"/> Judicial district correctional or detention facility <input type="checkbox"/> City or municipal correctional or detention facility (e.g. police lockup or city jail) <input type="checkbox"/> Private corrections or detention provider <input type="checkbox"/> Other - please name or describe: Click or tap here to enter text. <input type="checkbox"/> N/A
Number of staff currently employed by the facility who may have contact with residents:	6
Number of staff hired by the facility during the past 12 months who may have contact with residents:	0
Number of contracts in the past 12 months for services with contractors who may have contact with residents:	1
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	0
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0

Physical Plant

Number of buildings: Auditors should count all buildings that are part of the facility, whether residents are formally allowed to enter them or not. In situations where temporary structures have been erected (e.g., tents) the auditor should use their discretion to determine whether to include the structure in the overall count of buildings. As a general rule, if a temporary structure is regularly or routinely used to hold or house residents, or if the temporary structure is used to house or support operational functions for more than a short period of time (e.g., an emergency situation), it should be included in the overall count of buildings.	1
Number of resident housing units: Enter 0 if the facility does not have discrete housing units. DOJ PREA Working Group FAQ on the definition of a housing unit: How is a "housing unit" defined for the purposes of the PREA Standards? The question has been raised in particular as it relates to facilities that have adjacent or interconnected units. The most common concept of a housing unit is architectural. The generally agreed-upon definition is a space that is enclosed by physical barriers accessed through one or more doors of various types, including commercial-grade swing doors, steel sliding doors, interlocking sally port doors, etc. In addition to the primary entrance and exit, additional doors are often included to meet life safety codes. The unit contains sleeping space, sanitary facilities (including toilets, lavatories, and showers), and a dayroom or leisure space in differing configurations. Many facilities are designed with modules or pods clustered around a control room. This multiple-pod design provides the facility with certain staff efficiencies and economies of scale. At the same time, the design affords the flexibility to separately house residents of differing security levels, or who are grouped by some other operational or service scheme. Generally, the control room is enclosed by security glass, and in some cases, this allows residents to see into neighboring pods. However, observation from one unit to another is usually limited by angled site lines. In some cases, the facility has prevented this entirely by installing one-way glass. Both the architectural design and functional use of these multiple pods indicate that they are managed as distinct housing units.	1
Number of single resident cells, rooms, or other enclosures:	2
Number of multiple occupancy cells, rooms, or other enclosures:	0
Number of open bay/dorm housing units:	0
Number of segregation or isolation cells or rooms (for example, administrative, disciplinary, protective custody, etc.):	0
Does the facility have a video monitoring system, electronic surveillance system, or other monitoring technology (e.g. cameras, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has the facility installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology in the past 12 months?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Medical and Mental Health Services and Forensic Medical Exams	
Are medical services provided on-site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are mental health services provided on-site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>Where are sexual assault forensic medical exams provided? Select all that apply.</p>	<input type="checkbox"/> On-site <input checked="" type="checkbox"/> Local hospital/clinic <input type="checkbox"/> Rape Crisis Center <input type="checkbox"/> Other (please name or describe: Click or tap here to enter text.)
<p>Investigations</p>	
<p>Criminal Investigations</p>	
<p>Number of investigators employed by the agency and/or facility who are responsible for conducting CRIMINAL investigations into allegations of sexual abuse or sexual harassment:</p>	<p>2</p>
<p>When the facility received allegations of sexual abuse or sexual harassment (whether staff-on-resident or resident-on-resident), CRIMINAL INVESTIGATIONS are conducted by: Select all that apply.</p>	<input type="checkbox"/> Facility investigators <input checked="" type="checkbox"/> Agency investigators <input type="checkbox"/> An external investigative entity
<p>Select all external entities responsible for CRIMINAL INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for criminal investigations)</p>	<input type="checkbox"/> Local police department <input checked="" type="checkbox"/> Local sheriff's department <input type="checkbox"/> State police <input type="checkbox"/> A U.S. Department of Justice component <input type="checkbox"/> Other (please name or describe: <input type="checkbox"/> N/A
<p>Administrative Investigations</p>	
<p>Number of investigators employed by the agency and/or facility who are responsible for conducting ADMINISTRATIVE investigations into allegations of sexual abuse or sexual harassment?</p>	<p>3</p>
<p>When the facility receives allegations of sexual abuse or sexual harassment (whether staff-on-resident or resident-on-resident), ADMINISTRATIVE INVESTIGATIONS are conducted by: <i>Select all that apply</i></p>	<input checked="" type="checkbox"/> Facility investigators <input checked="" type="checkbox"/> Agency investigators <input type="checkbox"/> An external investigative entity
<p>Select all external entities responsible for ADMINISTRATIVE INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for administrative investigations)</p>	<input type="checkbox"/> Local police department <input checked="" type="checkbox"/> Local sheriff's department <input type="checkbox"/> State police <input type="checkbox"/> A U.S. Department of Justice component <input type="checkbox"/> Other (please name or describe: Click or tap here to enter text.) <input type="checkbox"/> N/A

Audit Findings

Audit Narrative (including Audit Methodology)

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-onsite audit, onsite audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

The Prison Rape Elimination Act (PREA) on-site audit for the Clarke County Short-Term Juvenile Detention Facility was conducted on March 29, 2021 in Grove Hill, AL. The audit was conducted to determine compliance with the Prison Rape Elimination Act (2003) and its' standards for zero tolerance of sexual abuse in juvenile correctional and residential facilities. Please refer to the National Prison Rape Elimination Act Resource Center for additional information at www.prearesourcecenter.org. The audit was conducted by Christy Slauson Vincent, United States Department of Justice (DOJ) PREA dual certified juvenile and adult facilities auditor, operating as an independent contractor with no conflict of interest with respect to her ability to conduct an audit of the facility under review.

The audit process consisted of documentation review, staff interviews, and an on-site tour of the Clarke County Short-Term Juvenile Detention Facility. The pre-audit preparation included a thorough review of all documentation and material submitted by the facility along with data included in the completed Bureau of Justice Assistance (BJA) Pre-Audit Questionnaire for Juvenile Facilities. The auditor received primary documentation which consisted of policies and secondary documentation which also consisted of procedures on a flash drive for review prior to the on-site phase of the audit process. The documentation reviewed consisted of facility policies, procedures, forms, education materials, training curriculum, organization chart, posters, brochures, resident population reports, memorandums of agreement, signed training rosters, community-based contact information, facility schematic, juvenile intake records and signed acknowledgments, and other PREA related materials that were provided to demonstrate compliance with the PREA standards. This review prompted a series of questions that were written and submitted to the facility PREA Coordinator. Answers to the auditor's follow-up questions, along with supporting documentation were submitted by the facility PREA Coordinator and reviewed by the auditor prior to the on-site phase of the audit process. During the first and second review of material, the auditor and PREA Coordinator worked diligently to obtain all material necessary to meet the standards for PREA compliance.

A schematic layout of the facility was provided to the auditor prior to the on-site portion of the audit. The auditor met with the PREA Coordinator, PREA Compliance Manager, and Facility Head upon arrival for the on-site portion of the audit. The auditor was allowed access to the facility to conduct the audit. After the initial meeting, the auditor toured the facility accompanied by the PREA Coordinator. During the on-site tour of the facility, the auditor reviewed compliance with the PREA standards based upon practice, daily activities, documentation, observation, and interviews with staff. The auditor contact information was

posted throughout the facility prior to the on-site phase of the audit, dated March 9, 2021, and was able to verify posting of notification during the on-site tour. A list of staff and contractors to include assignments and roles was provided to the auditor on the day of the on-site visit. There were no juveniles being held at the Clarke County Short-Term Juvenile Detention Facility on the day of the on-site visit; therefore, there were no random and objective selection of residents for interviews.

Interviews were conducted with the Head of the Facility, PREA Coordinator, PREA Compliance Manager, Human Resources, Investigator, the contracted on-site nurse and other pertinent personnel and/or agencies. Staff were interviewed using the recommended Department of Justice audit interview protocols for juvenile facilities. This included questioning that was included but not limited to: purpose, meaning, protections provided by the act, how to report (methods available for reporting), when to report, rights, responsibilities, etc. Staff were also questioned concerning their PREA training and overall knowledge of the agency's zero tolerance policy, the response protocols when a juvenile alleges abuse, and first responder duties. All staff interviewed could articulate the facility's zero-tolerance policy and First Responder Duties. A total of 6 facility staff and 12 specialized staff were interviewed by the auditor. The auditor received no inquiries or requests for an interview from the auditor posted contact information. There were no juveniles being held at the Clarke County Short-Term Juvenile Detention Facility on the day of the on-site visit; therefore, there were no random and objective selection of residents for interviews.

An exit interview was conducted at the end of the on-site visit by the auditor with the PREA Coordinator. Recommendations were made by the auditor to the facility PREA Coordinator to complete within 30 days of the on-site visit to be fully compliant with the PREA standards. Those recommendations included: adding the SANE Center address to all posters, pamphlets, and flyers; change the wording on the Housing Placement Form, provide signed and dated non-occurrence and non-applicable statements for any standard that applies; create an Institutional Plan, create an annual report for the previous year in review and upload it to the agency website; provide medical personnel certification of Specialized Sexual Abuse training, train all staff on transgender and intersex pat search requirements and provide staff signatures proving acknowledgment of such training; and provide a completed background checks log for staff and contractors. The listed recommendations were completed and provided to the auditor within the required 30 days.

The post-audit review consisted of the auditor evaluating all documentation gathered throughout the audit process, reviewing staff interview protocols, and reviewing the BJA Pre-Audit Questionnaire. The auditor used the PREA Audit Compliance Tool for Juvenile Facilities and the National Juvenile PREA Standards as a guide to determine compliance. The auditor determined that Clarke County Short-Term Juvenile Detention Facility is fully compliant with all 42 PREA standards. The auditor also issued a finding of Exceed Standard for four (4) standards: 115.313, *Supervision and Monitoring*, 115.318, *Upgrades to Facility and Technology* and 115.364, *First Responder Duties*, and 115.382, *Emergency Access to Medical and Mental Health Care*.

Facility Characteristics

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate, resident or detainee population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

Clarke County Short-Term Juvenile Detention Facility has a maximum stay of 72-hour for juveniles between the ages of 13-17. The purpose of this juvenile facility is to provide temporary care for delinquent juveniles or juveniles alleged to be delinquent, in a secure custodial environment pending court disposition, and/or transfer to a long-term residential facility or for the juvenile to be returned to his/her home.

The Mission of Clarke County Short-Term Juvenile Detention Facility is to protect the interest and safety of the community and juvenile(s) by providing a secure and safe environment. To accomplish the mission, the facility states "a secure and orderly environment will be maintained through direct supervision by well-trained staff". As an agency, the Clarke County Sheriff's Office is committed to operating efficiently, effectively, and with accountability. Clarke County Sheriff's Office in conjunction with Clarke County Short-Term Juvenile Detention Facility promotes and affirms the following:

1. Safety and security are the top priorities of our decision-making;
2. Juveniles can understand the impact of crime on others;
3. Juveniles can understand the ability to choose to be responsible and accountable for their behavior;
4. Juveniles deserve to be treated with dignity and respect;
5. The most effective services are individualized;
6. We value and support well-trained staff;
7. We value ethical, competent, and committed employees;
8. Personnel are involved in the decision-making process of the agency; and
9. Provide safe keeping of the juveniles pending a 72-hour hearing and transportation to the juvenile's court-designated location stays.

The Clarke County Sheriff's Office and Clarke County Short-Term Juvenile Detention Facility are housed within one building complex. The juvenile detention facility is sight and sound separated from the adult inmates by a steel framed door and a small corridor. The two (2) juvenile living quarters are individual cell units in design, with an adjoining eating/dayroom area directly in front of the living quarters. The population at the time of the PREA on-site portion of the audit was zero (0). The juvenile facility has several staff offices, a central control room with video surveillance, electronic doors, intake area, visitation area and a shower.

Summary of Audit Findings

The summary should include the number and list of standards exceeded, number of standards met, and number and list of standards not met.

Auditor Note: *No standard should be found to be "Not Applicable" or "NA". A compliance determination must be made for each standard.*

Standards Exceeded

Number of Standards Exceeded: 4

List of Standards Exceeded: 115.313, 115.18, 115.64, 115.82

Standards Met

Number of Standards Met: 39

Standards Not Met

Number of Standards Not Met: 0

List of Standards Not Met: 0