



Sam Brownback, Governor
Joe Norwood, Secretary of Corrections

Annual PREA Report

**A comparative analysis of PREA data from
CY2011 - CY2015
Facilities Management – PREA Unit**

This document serves as an annual review to assess and improve the effectiveness of sexual abuse prevention, detection, and response policies, practices, and training as outlined in §115.87 and §115.387 Data collection; §115.88 and §115.388 Data review for corrective action.

Executive Summary

The Kansas Department of Corrections (KDOC) is making significant progress toward full PREA compliance in the areas of prevention, detection and response to incidents of sexual abuse and harassment. The Prison Rape Elimination Act (PREA) Federal Standard §115.88 and §115.388 requires that each facility collect and review data "...in order to assess and improve the effectiveness of sexual abuse prevention, detection, and response policies, practices and training." This report works to meet this standard as well as:

- Identify action taken to address problem areas in the past year (§115.89 and §115.389)
- Compare PREA related data to previous year's data
- Share positive steps the Kansas Department of Corrections (KDOC) has taken to implement PREA in collaboration with other agencies
- Identify problem areas to be addressed in the future

KDOC has interpreted the federal PREA standards as a foundation rather than best practices. The goal is to develop strategies and practices that build on that foundation, continuously improving prevention, detection, response, investigation across the agency, not just in the facilities that are specifically addressed by the standards. Any level of sexual abuse anywhere within the agency is not acceptable.

KDOC has worked diligently to incorporate PREA into the culture of the department and will continue this important work. KDOC will endeavor to keep people safe – those who work within the correctional system, those who are housed within the correctional system, and those who live in Kansas communities.

KDOC is proud of these accomplishments and is confident that established strategies coupled with staff dedication will continue to enhance these efforts.



SECTION ONE

Overview and Background

History

PREA legislation has been in place for over a decade. The Prison Rape Elimination Act (PREA) was enacted in 2003 by President George W. Bush. It is important to note that even though PREA was passed in 2003; correctional professionals within the Kansas Department of Corrections have been working hard to address staff sexual misconduct before the law was passed. It was only in 2012 that specific standards were codified to ensure corrections operations are compliant with expectations of the law. The standards cover prevention planning, responsive planning, training and education, screening for risk, reporting, policy for official response, investigations, discipline, medical and mental health care, data collection and audits.

The Kansas Department of Corrections (KDOC) works to implement PREA as part of the overall mission to "...contributes to public safety and supports victims of crime..." and the vision of "A safer Kansas through effective correctional services." Throughout the PREA implementation process in KDOC's eight adult and two juvenile correctional facilities, staff has worked to make clear connections between the overall safety and security of facilities and the inclusion of PREA policies and practices.

Demonstration Grants

Prison Rape Elimination Act: Demonstration Projects to Establish "Zero Tolerance" Cultures for Sexual Assault Program FY2011 Competitive Grant

In 2009, the KDOC received technical assistance from the National Institute of Corrections (NIC) at the request of then-Kansas Governor Mark Parkinson to review the KDOC's policies and training procedures related to staff sexual misconduct and cross gender supervision. In the resulting report, the NIC commended the KDOC for its commitment to addressing the issue of sexual abuse and acknowledged that the KDOC has undertaken a number of progressive strategies. These strategies include training investigations staff in proper investigatory techniques and processes, changing the investigative processes and response timetables, developing an inmate orientation DVD, implementing a new Prison Rape Elimination Act (PREA) policy, developing training for volunteers, working with community organizations, implementing a sexual assault hotline, instituting a critical incident review process, implementing a medical protocol that includes a sexual assault nurse examiner, working to develop gender responsive

training materials and exploring the creation of a risk-needs assessment to identify vulnerable and aggressive inmates.¹

The NIC criminal justice consultants wrote, “All of these efforts demonstrate the Department’s awareness of this important issue, and their attention to continual improvement.” However, the NIC also identified several areas where the KDOC must focus more time and resources to improve the sexual safety of its inmates. Among the NIC’s recommendation were:

- Review the amount of time and delivery strategy for Prison Rape Elimination Act (PREA)-related training; and ensure that all staff participates in annual refresher training on the topic, including the prevention and detection of staff sexual misconduct;
- Develop a gender responsive training curriculum;
- Clearly define for staff the behaviors that would constitute undue familiarity, as well as those behaviors that would not;
- More extensive reviewing of inmate perceptions and behavior regarding reporting staff sexual misconduct, as well as any barriers to reporting incidents when they occur;
- More extensive reviewing of staff perceptions regarding reporting incidents of staff sexual misconduct;
- Review the grievance process to determine whether changes may be necessary to promote greater inmate confidence in the process, including additional means of providing assurances that there will be no retaliation for the filing of grievances;
- Build upon the KDOC’s process for reviewing sexual abuse incidents and emphasize the importance of the strategy; and,
- Ensure long-term inmates have the opportunity to receive PREA orientation training.

The KDOC began acting on the NIC recommendations while also examining the KDOC’s compliance with PREA standards. However, the KDOC’s ability to enact necessary improvements has been stymied by budget cuts, programming loss and a growing inmate population. The KDOC sought funding to strengthen the department’s existing Sexual Assault Prevention and Intervention Program to improve staff training and the quality and continuity of services for inmates.²



BJA Bureau of
Justice Assistance
RIV RESEARCH AND
INTEGRATION

In October 2011, the Kansas Department of Corrections was awarded a Prison Rape Elimination Act: Demonstration Projects to Establish “Zero Tolerance” Cultures for Sexual Assault Programs in the amount of \$599,862.00 with a

¹ 2011-RP-BX-0021, Project Abstract, page 2

² 2011-RP-BX-021, Project Narrative, pages 3 - 4

\$260,439.00 match from state general funds. With funding, the KDOC would implement an internal classification instrument/system and create a full-time PREA coordinator position, hire a Corrections Counselor II for the Reception & Diagnostic Unit at El Dorado Correctional Facility, and hire a Corrections Counselor II position for the Enhanced Management Unit at Hutchinson Correctional Facility³.

This grant allowed KDOC sufficient time to undertake a comprehensive review of policies, protocols and practices, and work toward a culture of compliance and reporting. The following table reflects the timeline behind the comprehensive policy reviews and updates the KDOC has taken since 2011.

PREVENTION PLANNING	
Standard	Action
Zero tolerance of sexual abuse and sexual harassment, PREA Coordinator §§115.11 and §§115.311	2011: The Kansas Department of Corrections (KDOC) hired a fulltime PREA Coordinator in December 2011. This position has the responsibility for developing, implementing and overseeing the department's efforts to comply with PREA standards in all state operated facilities.
	2013: In October 2013, GAN #15 was approved to move this position from being funded by this grant to state general funds as an in-kind match by KDOC.
	2014: IMPP 10-103D, "Coordinated Response to Sexual Abuse and Harassment" went into effect April 4, 2014 department wide (includes juvenile and adult facilities). This policy included the following language: <i>The KDOC shall designate a KDOC PREA Coordinator to oversee agency efforts to comply with PREA standards and each Warden/Superintendent shall assign one staff member as the facility PREA Compliance Manager (PCM) with overall responsibility for coordinating all elements of the Coordinated Response.</i>
Supervision and monitoring §§115.13; §115.313	2011: KDOC is currently in the process of drafting a department wide policy that will ensure that each facility is sufficiently and efficiently staffed, and that staffing is adequate to protect incarcerated offenders against sexual abuse. This will include a systematic staff analysis being conducted annually at each facility.
	2014: IMPP 12-137D "Staffing Analysis, Operational Staffing and Roster Management" went into effect July 1, 2014. This policy also included the requirement that facilities must send a copy of their report to the Deputy Secretary of Facilities Management (adults) and the Deputy Secretary of Juvenile Services (juveniles) as well as the PREA Coordinator.

³ 2011-RP-BX-0021, Project Abstract, page 1

<p>Juvenile/youthful inmates/residents/detainees §§115.14 and §§115.314</p>	<p>2011: KDOC has entered into agreements with two other states to house male and female youthful inmates per IMPP 11-104 “Interstate Corrections Compact – Facilities Transfers”.</p> <p>2014: IMPP 10-103D, “Coordinated Response to Sexual Abuse and Harassment” went into effect April 4, 2014. On page 3 of this policy it states. <i>“While housed at any KDOC facility, youthful offenders shall have sight and sound separation from other adult offenders or have direct staff supervision.”</i></p> <p>2015: In March 2015, House Bill 2382 went into effect. This bill amends Kansas law relating to placement of certain juvenile offenders in the custody of the Secretary of Corrections to permit the Secretary to place juveniles between 16 and 18 years of age who are convicted as adults or under extended jurisdiction juvenile prosecutions either in a juvenile correctional facility or an adult correctional facility. IMPP11-104 and IMPP 10-103D will soon be updated to reflect the language in the new Kansas law.</p>
<p>Limits to cross-gender viewing and searches §§115.15 and §§115.315</p>	<p>2011: KDOC is currently in the process of updating policy for its state operated juvenile and adult facilities that outlines the limitations of cross-gender viewing and searches of offenders.</p> <p>2013: On January 4 2013, KDOC-Juvenile Services put into effect IMPP 12-103 “Searches and Contraband Control.” On Page 6 of this policy outlines that any pat down search of a juvenile shall be by the same gender staff, except in exigent circumstances. It also outlines that any cross-gender searches shall be documented in writing with a report filed with the superintendent and the JJA chief attorney. On page 9 of the same policy strip searches are also outlined; specifically stating that it must be done by the same gendered staff, witnessed by an additional same gendered staff and documented in writing. – KDOC also has an adult policy (IMPP 12-103 “Offender and Facility Searches”) that outlines the procedure for any cross gender pat down searches and viewing. IMPP 12-103 was amended March 20, 2013 to reflect the following language of staff conducting pat down/strip searches of offenders must be the same gender as the offender. This includes any remote camera viewing of strip searches. Language was also included on pat searches of transgender and intersex offenders.</p> <p>2014: IMPP 10-103D “Coordinated Response to Sexual Abuse and Harassment” went into effect April 4, 2014 department wide (includes juvenile and adult facilities). It includes the following language, <i>“Staff shall be aware of offender’s state of undress. The presence of staff of the opposite gender shall be announced prior to entering a housing unit where an offender would normally be undressed. An offender shall be able to shower and perform bodily functions without nonmedical staff</i></p>

	<i>of opposite gender viewing them, except in exigent circumstances or when such viewing is incidental to routine security checks.</i>
Inmates/residents with disabilities §§115.16 and §§115.316	2012: KDOC currently has in place IMPP 10-138 "Assistance for Offenders and/or Victims with Limited English Proficiency" which was last updated May 5, 2012. This policy requires that the department to maintain a listing of frequently encountered languages. In order to be on this list the language must be spoken by more than 5% of the offender population. The policy also outlines interpretive procedures which include the use of a bilingual KDOC employee; use of a friend/family member of the offender only if specifically requested by that offender and after they have been informed that the outside services are available at no cost; and outside interpreters. IMPP 01-103 "Inmate Rule Book Distribution" is in effect (last updated May 7, 2004) which states, <i>"when literacy or language problems prevent an inmate from understanding the rule book a staff member or translator shall assist the inmate in understanding the rules."</i>
	2013: In 2013, KDOC began placing PREA-related posters in English and in Spanish in all of its state operated facilities.
	2014: In April 2014 IMPP 10-103D "Coordinated Response to Sexual Abuse and Harassment" was implemented with the following language, "Facilities shall provide offender education, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills."
	2015: In 2015, IMPP 10-138 is under review to include more PREA-related language.
Hiring and promotion decisions §§115.17 and §§115.317	2011: KDOC currently has in place IMPP 02-126 "Recruitment and Selection Process". This policy includes language that forbids the promotion of employees with formal disciplinary actions. It also covers background checks for new hires and promotions. These background checks will include, at a minimum, checking NCIC and III.
	2013: In 2013, this policy was amended to include language that forbid the hiring of new staff or the promotion of new staff who have engaged in sexual abuse of offenders in an institutional setting; been convicted of engaging in sexual activity in community facilities by force; civilly or administratively adjudicated to have engaged in sexual abuse of an offender. Language was also added that prior institutional employers will be contacted for information on substantiated allegations.
	2015: In 2015, IMPP 02-126 was revoked and IMPP 02-126D began into effect. The language remained the same; however, it now included both juvenile and adult state operated facilities.

TRAINING AND EDUCATION	
<p>Employee and volunteer training §§115.31 and §§115.331</p>	<p>2011: KDOC currently has in place IMPP 03-104 “Minimum Department Training Standards” which was last updated August 2008. In this policy it outlines the required course for all staff and volunteers inside our facilities and in the community. Part of the required courses for all new hires/volunteers and annual refresher courses for all staff/volunteers includes undue familiarity and unlawful sexual relations. All training rosters are maintained by KDOC Staff Development Division.</p> <p>2014: In August 2014 IMPP 03-103 was revoked and reissued as 03-103D. This policy now includes juvenile facilities as well as outlines the requirements for taking the following class: Offender Sexual Assault Prevention/PREA. By the end of 2014 all current staff and volunteer had received this course which included topics (per IMPP 10-103D “Coordinated Response to Sexual Abuse and Harassment) on how to fulfill their responsibilities under sexual abuse and sexual harassment prevention, detection, reporting, and response, offenders rights to be free from sexual abuse and sexual harassment; the offenders rights to be free from retaliation for making a report, dynamics of sexual abuse and sexual harassment in confinement, common reactions of sexual abuse and sexual harassment victims, how to detect and respond to signs of threatened and actual sexual abuse; how to avoid inappropriate relationships with offender, how to effectively communicate with LGBTI populations, and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. In the spring of 2014, the annual PREA refresher course became part of the required annual training for all staff/volunteers.</p>
<p>Volunteer and contractor training/Detainee, contractor, and inmate worker notification of agency’s zero-tolerance policy [§§115.32 and §§115.332</p>	<p>2011: KDOC currently has in place IMPP 13-101 “Volunteer Basic and Annual Training” and IMPP 13-103 “Volunteer Orientation Requirements.” Both of the IMPP’s outline the required training that includes the topics of undue familiarity and unlawful sexual relations with offenders. All volunteers are required to sign an acknowledgement form showing they received the training.</p> <p>2014: In 2014, both IMPP’s were revoked. They were reissued as IMPP 13-101D and IMPP 13-103D. The reissued policies included updated language that reflected the zero-tolerance culture of KDOC. All volunteers/contractors are required to take an introductory PREA course and sign an acknowledgement that they understood the course and they are aware of KDOC’s zero-tolerance policy against the sexual abuse of offenders. Volunteers/contractors were also notified that annual refresher trainings on PREA will be required.</p>

	<p>Since 2002, KDOC has had written policy mandating a zero-tolerance toward all forms of sexual abuse and offenders are informed of this policy through orientation.</p>
<p>Inmate/Resident education [§§115.33 and §§115.333</p>	<p>2014: In April 2014, IMPP 10-103D “Coordinated Response to Sexual Abuse and Harassment” was implemented statewide. On page 5 of this policy, offender education is outlined to include how the department’s policy and procedure regarding sexual abuse/harassment in each facility orientation program; obtaining offender’s acknowledgement of receiving this information; providing a timeframe on when each offender is to receive comprehensive education about their rights to be free from sexual abuse and sexual harassment, free from retaliation for reporting such incidents; and how to report such incidents. The policy outlines how this education is to be documented and how to provide this education to those individuals who are limited English proficient, deaf, visually impaired or otherwise disabled. The policy also states that each facility is to make this information readily available to all offenders even after they receive it during the orientation process.</p>
	<p>2011: KDOC currently has in place IMPP 03-104 “Minimum Department Training Standards” which was last updated August 2008. In this policy it outlines the required course for all staff and volunteers inside our facilities and in the community. Part of the required courses for all new hires/volunteers and annual refresher courses for all staff/volunteers includes undue familiarity and unlawful sexual relations. All training rosters are maintained by KDOC Staff Development Division.</p>
<p>Specialized training: Investigations [§§115.34 and §§115.334</p>	<p>2014: In August 2014 IMPP 03-103 was revoked and reissued as 03-103D. This policy now includes juvenile facilities as well as outlines the requirements for taking the following class: Offender Sexual Assault Prevention/PREA. By the end of 2014 all current staff and volunteer had received this course which included topics (per IMPP 10-103D “Coordinated Response to Sexual Abuse and Harassment”) on how to fulfill their responsibilities under sexual abuse and sexual harassment prevention, detection, reporting, and response, offenders rights to be free from sexual abuse and sexual harassment; the offenders rights to be free from retaliation for making a report, dynamics of sexual abuse and sexual harassment in confinement, common reactions of sexual abuse and sexual harassment victims, how to detect and respond to signs of threatened and actual sexual abuse; how to avoid inappropriate relationships with offender, how to effectively communicate with LGBTI populations, and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. In the spring of 2014, the annual PREA refresher course became part of the required annual training for all staff/volunteers. IMPP 10-103D also</p>

	<p>outlines specialized training for investigators. This training includes how to conduct such investigations in confinement settings and techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collections in confinement settings, and the criteria and evidence required to substantiate a case for administration action or prosecution referral. This also required the facility to maintain documentation of this specialized training. IMPP 22-103 "Investigation Procedures" effective April 1, 2014 also makes reference to this specialized training requirement.</p>
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SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

<p>Screening for risk of victimization and abusiveness/Obtaining information from residents [§§115.41 and §§115.341</p>	<p>2011: KDOC currently has in place an Inmate Custody Classification system. This procedure was updated in 2008 to include looking these special considerations when determining placement and custody levels: history of disciplinary reports, criminal history; history of violent behavior, are they required to be separated from other inmates, and are they a sexual predator. In 2011, KDOC used grant funds to hire an applications developer to design and implement an internal classification system that would identify those offenders who are at an increased risk to be sexually victimized and those who may be potentially aggressive towards other inmates. This individual was only with KDOC for a few months. In 2012, KDOC created an automated form for adult offenders and included it in TOADS (Total Offender Activity Documentation System).</p>
	<p>2013: In 2013 an Internal Classification Manual was created and training went statewide to train Administration, Classification Administrators, Unit Team Managers and Corrections Counselors in the use of the this screening tool. IMPP 10-139 "Screening for Sexual Victimization and Abusiveness" was also created and implement on April 26, 2013. This policy outlined how to use the tool, timeframes, re-assessments and override procedures. A juvenile version was also created in 2013; however, while their staff attended this training, this form was not automated.</p>
	<p>2014: All training for identified staff that will be using this tool was completed in 2014.</p>
	<p>2015: In 2015, the ICC (adult) and SVA (juvenile) is in the process of being moved over to a web-based application. This policy is currently under review to include juvenile procedures.</p>
	<p>2013: In 2013 an Internal Classification Manual was created and training went statewide to train Administration, Classification Administrators, Unit Team Managers and Corrections Counselors in the use of the this screening tool. IMPP 10-139 "Screening for Sexual Victimization and Abusiveness" was also created and implement on April 26, 2013. This policy outlined how to use the tool, timeframes, re-</p>

<p>Use of screening information/Placement of residents in housing, bed, program, education, and work assignments [§§115.42 and §§114.342</p>	<p>assessments and override procedures. This policy also included the following language; <i>“The scores and information obtained from the Intake/Multi-Occupancy House form and the Internal Classification Instrument will then be used to make determinations regarding housing, bed, and work, education, and program assignments. The parameters of these determinations will be specified at the facility level, per General Order.”</i></p> <p>2015: This policy is currently under review to include juvenile procedures.</p>
<p>INVESTIGATIONS</p>	
<p>Reporting to inmates/residents [§§115.73 and §§115.373</p>	<p>2014: On April 4, 2014, KDOC implemented IMPP 10-103D “Coordinated Response to Sexual Abuse and Harassment.” This policy outlined the procedures to report back to offenders the results of sexual abuse investigations. It states, <i>“Following an investigation of sexual abuse, EAI, or designated facility staff, shall inform the offender of the disposition of the investigation (substantiated, unsubstantiated, or unfounded)...At the conclusion of the investigation, these status updates shall be completed by the special agent and formalized on the Notification of Status form (IMPP 22-103, Attachment H).</i></p>
<p>DATA COLLECTION AND REVIEW</p>	
<p>Sexual abuse incident reviews §§116.86 and §§115.386</p>	<p>2011: KDOC currently has IMPP 12-118 “Serious Incident Review Board Actions Pending and Subsequent to Incident Reviews, Sexual Incident Review.” This policy states, <i>“When, in the judgment of the Serious Incident Review Board Executive Committee, a review of a serious incident is necessary, a Serious Incident Review Board shall be convened at the direction and under the supervision of the Chief Legal Counsel or designee to inquire into the facts and circumstances of any serious incident as may involve departmental staff, occur within the Department, on KDOC properties, or during KDOC sanctioned activities.”</i></p> <p>2014: This policy was amended in May of 2014 to update its language to match national PREA standards. IMPP 10-103D “Coordinated Response to Sexual Abuse and Harassment” also addresses sexual abuse incident reviews. It states, <i>“All instances where sexual abuse which is not unfounded (whether substantiated or unsubstantiated) through an appropriate investigation, shall be reviewed by a Sexual Abuse Incident Review Team pursuant to IMPP 12-118.”</i> All copies of Sexual Abuse Incident Review forms are forwarded to the Statewide PREA Coordinator and also become a part of the investigative case file.</p>



***PREA Program: Demonstration Projects to Establish
"Zero Tolerance" Cultures for Sexual Assault in
Correctional Facilities, FY2014 Competitive Grant***

On September 16, 2014, the KDOC was awarded another Demonstration Projects to Establish 'Zero Tolerance' Cultures for Sexual Assault in Correctional Facilities" grant in the amount of \$499,100.00.

On July 1, 2013, the former Juvenile Justice Authority was merged by the Governor's Executive Order with the KDOC, and is now the Juvenile Division of the KDOC. Thus, KDOC has also taken on the responsibility of the two juvenile facilities and 18 youth residential centers being in compliance with PREA.

The funding from this grant allowed the KDOC to accomplish the following:

- Hire a dedicated PREA Compliance Manager for KDOC's largest adult male facility
- Hire a PREA Specialist
- Hire an Application Developer to develop a web-based application to automate all PREA forms including:
 - Adult and Juvenile Internal Risk Assessment
 - PREA Notification Checklist
 - SAIR Forms
- Purchase mesh windows for Topeka Correctional Facility

All goals outlined in this grant have been accomplished.

SECTION TWO:

Audits

§ 115.401 Frequency and scope of audits.

(a) During the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once.

Audit Summary



The Prison Rape Elimination Act (PREA) was passed in 2003 with unanimous support from both parties in Congress. Eliminating prison rape is a priority of the U. S. Department of Justice (DOJ) because they believe that sexual abuse is a crime, and should not be the punishment for a crime. On June 20, 2012, after extensive notice-and-comment rulemaking and consultation with State and local corrections officials and other stakeholders, DOJ published a final rule adopting national standards for the detection, prevention, reduction, and punishment of prison rape as directed by PREA. The National PREA Standards, which are found at 28 C.F.R. Part 115, took effect on August 20, 2012, and apply to DOJ, State, and local confinement facilities, including adult prisons and jails, juvenile facilities, police lockups, and community corrections facilities⁴.

Federal PREA standards mandate all agencies conduct audits in one-third of their facilities each year of a three-year audit cycle by Department of Justice (DOJ) certified auditors. Please note that the standards require that any public agency that contracts for the confinement of its inmates with private agencies or other entities, including other government agencies, (1) include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards, and (2) provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards: 28 C.F.R. §§ 115.12, 115.112, 115.212, 115.312. A State confinement agency that fails to comply with these requirements is, by the terms of the standards, not PREA compliant.⁵

The first audit cycle began on August 20, 2013. During that first year KDOC focused on preparing for the DOJ audits by:

⁴ The National PREA Resource Center's website is www.prearesourcecenter.org. The final rule, including the National Standards, can be found at <http://www.prearesourcecenter.org/sites/default/files/library/2012-12427.pdf>.

⁵ Frequently asked questions dated November 27, 2013 for standard 115.501 is maintained on the PREA Resource Center website at www.prearesourcecenter.org. This frequently asked question; "In determining whether to certify that my State is in "full compliance" with the National PREA Standards, how do I determine which facilities are "under the operational control of the State's executive branch?" can be found at <https://www.prearesourcecenter.org/frequently-asked-questions#ec-faq>.

- Completing a comprehensive review of KDOC policies;
- Completing a pre-audit by members of the Central Office PREA team to evaluate compliance, conduct interviews of staff and offenders/residents to gauge their understanding of PREA, and evaluate physical plant barriers and areas of risk;
- Assisting state-operated facilities scheduled to have their audits in 2014 and 2015 in gathering documentation requested by certified DOJ auditors followed by an onsite review of procedures and physical plant couple with interviews of staff and offenders.

In order to defray auditing costs, in May 2014 the KDOC became member of a five state circular audit consortium to audit adult state-operated facilities. The members included: Iowa, Kansas, Kentucky, Missouri, Louisiana and South Dakota. Facilities audited in 2014 were conducted by certified DOJ auditors from the Iowa Department of Corrections (IDOC). Facilities audited in 2015 were conducted by the IDOC and the Kentucky Department of Corrections. For KDOC's state-operated juvenile facilities, KDOC joined a similar consortium consisting of Indiana, Kansas and South Dakota. In 2015, Indiana replaced South Dakota in the consortium.

In 2014 and 2015 eight of KDOC's ten state-operated adult facilities and two state-operated juvenile facilities were audited. At the completion of the audit process they were found to be in full compliance with national PREA standards. In addition, eight of the twelve contracted youth residential facilities were also audited in 2015. Five of these facilities also reached full compliance with the national standards. The remaining facilities, as well as the five county jail contracted placements will be audited in 2016.

Audits Completed in 2014

Facility Name	Facility Type	Agency	Completion Date	Compliance Determination
Topeka Correctional Facility	Prison – Women	KDOC	August 2014	Full Compliance
Larned Juvenile Correctional Facility	Juvenile – Male	KDOC	September 2014	Full Compliance
Winfield Correctional Facility/Wichita Work Release Center	Prison – Male	KDOC	December 2014	Full Compliance
Hutchinson Correctional Facility	Prison – Male	KDOC	December 2014	Full Compliance ⁶

⁶ Final PREA audit reports for all KDOC state operated facilities can be located at <http://www.doc.ks.gov/publications/kdoc-facilities-management/prea/audits>

Audits Completed in 2015

Facility Name	Facility Type	Agency	Completion Date	Compliance Determination
Larned Mental Health Correctional Facility	Prison – Male	KDOC	May 2015	Full Compliance
Kansas Juvenile Correctional Complex	Juvenile – Male and Female	KDOC	June 2015	Full Compliance
Riverside Academy	Juvenile – Male	Contracted Placement	June 2015	Full Compliance
Lakeside Academy	Juvenile – Female	Contracted Placement	June 2015	Full Compliance
Ellsworth Correctional Facility	Prison – Male	KDOC	July 2015	Full Compliance
O’Connell Youth Ranch	Juvenile – Male	Contracted Placement	August 2015	Full Compliance
Sedgwick County Youth Placement Program	Juvenile – Male	Contracted Placement	September 2015	Full Compliance
El Dorado Correctional Facility – Main Unit	Prison – Male	KDOC	September 2015	Full Compliance
Elm Acres	Juvenile – Male	Contracted Placement	September 2015	Full Compliance
El Dorado Correctional Facility – South Unit	Prison – Male	KDOC	December 2015	Full Compliance ⁷

The following contracted placements have had their audits started in 2015; however, they are currently under a corrective action plan. It is anticipated their audits will be completed in 2016 and they will have reached full PREA compliance.

2015 Audits in Progress

Facility Name	Facility Type	Agency	Onsite Review
The Villages, Inc.	Juvenile – Male, Female	Contracted Placement	July 13 – 14, 2015

⁷ Final PREA audit reports for all KDOC state operated facilities can be located at <http://www.doc.ks.gov/publications/kdoc-facilities-management/prea/audits>

Barton County Young Men's Organization	Juvenile – Male	Contracted Placement	October 26 – 27, 2015
Home Ties	Juvenile – Male	Contracted Placement	November 18 – 20, 2015

Audits Scheduled in 2016

Facility Name	Facility Type	Agency	Tentative Date
Lansing Correctional Facility	Prison – Male	KDOC	March 2016
New Directions	Juvenile--Male	Contracted Placement	June 2016
Cloud County Law Enforcement Center	Jail –Male, Female	Contracted Placement	June 2016
Pratt County Achievement Place	Juvenile -- Male	Contracted Placement	July 2016
Norton Correctional Facility	Prison -- Male	KDOC	July 2016
Labette County Sheriff's Department	Jail – Male, Female	Contracted Placement	July 2016
Jackson County Sheriff's Department	Jail – Male, Female	Contracted Placement	July 2016
Butler County Detention Center	Jail – Male, Female	Contracted Placement	August 2016
Washington County Sheriff's Department	Jail – Male, Female	Contracted Placement	August 2016
Foundations	Juvenile – Male	Contracted Placement	August 2016

Audits assess operational compliance with standard requirements, and how well PREA prevention, reporting, response, and investigation strategies are engrained into the culture of each facility. This is only accomplished through the work and dedication of staff at all levels within the facility; each embracing the agency's zero tolerance of sexual abuse and sexual harassment. It also recognizes that staff understand an offender's/resident's right to be free from sexual abuse as well as well as retaliation for reporting allegations or cooperating with investigators in related investigations.

Governor's Certification

Pursuant to PREA Standard 115.501(a), Governors shall make their certification of compliance taking into consideration the result of the most recent audit results. DOJ intends audits to be a primary, but not the only, factor in determining compliance. For example, audit results for a particular period may show the selected one-third of audited facilities in compliance; however, the Governor may have determined that other facilities under his/her control are, in fact, not in compliance with the standards. Neither the PREA statute nor the PREA standards restrict the sources of information Governors may use in deciding whether or how to certify compliance.⁸

The National PREA Standards state that "The Governor's certification [of full compliance with the PREA standards] shall apply to all facilities in the State under the operational control of the State's executive branch, including facilities operated by private entities on behalf of the State's executive branch." (28 C.F.R. § 115.501(b)) A "facility" is defined as "a place, institution, building (or part thereof), set of buildings, structure, or an area (whether or not enclosing a building or set of buildings) that is used by an agency for the confinement of individuals." Some standards apply specifically at the facility level, while others apply at the agency level.

The definition of facility includes local detention and correctional facilities as well as State correctional facilities; however, not all facilities within a State are subject to the Governor's certification. The Governor's certification does not encompass those facilities outside the operational control of the Governor; namely, those facilities that are under the operational control of counties, cities, or other municipalities, or privately-operated facilities not operated on behalf of the State's executive branch.

The term "operational control" is not defined in the National PREA Standards. The determination of whether a facility is under the operational control of the executive branch is left to a Governor's discretion, subject to the following guidance.

- Generally, there are several factors that may be taken into consideration in determining whether a facility is under the "operational control" of the executive branch:
- Does the executive branch have the ability to mandate PREA compliance without judicial intervention?
- Is the State a unified correctional system? Does the State agency contract with a facility to confine inmates/residents on behalf of the State agency, other than inmates being temporarily held for transfer to, or release from, a State facility?

⁸ Frequently asked questions dated February 7, 2013 for standard 115.501 is maintained on the PREA Resource Center website at www.prearesourcecenter.org. This frequently asked question; "On what basis can the governor make a certification decision? Is the audit finding alone, or should the governor base certification on other items? If other items are applicable for a certification, what are some examples of these items?" can be found at <https://www.prearesourcecenter.org/frequently-asked-questions#ec-faq>.

The above list is not exhaustive but it covers the majority of the situations that Governors may face in determining whether a facility or contractual arrangement is subject to the Governor's certification.⁹

For the years 2014 and 2015, Governor Brownback signed assurances that Kansas will not use less than 5 percent of its covered DOJ grant funds for the next fiscal year to enable Kansas to adopt, and achieve full compliance with the National Standards to prevent, detect, and respond to Prison Rape (28 C.F.R Part 115), so as to ensure that a certification of full compliance may be submitted in future years.



⁹ Frequently asked questions dated November 27, 2013 for standard 115.501 is maintained on the PREA Resource Center website at www.prearesourcecenter.org. This frequently asked question; "In determining whether to certify that my State is in "full compliance" with the National PREA Standards, how do I determine which facilities are "under the operational control of the State's executive branch?" can be found at <https://www.prearesourcecenter.org/frequently-asked-questions#ec-faq>.

SECTION THREE:

Data

§ 115.87 and § 115.387 Data collection

(a) The agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.

(b) The agency shall aggregate the incident-based sexual abuse data at least annually.

(c) The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

(d) The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

(e) The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.

(f) Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

Research and Data

Data included in this report was collected from many sources. The Enforcement, Apprehension and Investigation database provided data on unfounded, unsubstantiated and substantiated PREA cases in KDOC's state-operated adult and juvenile correctional systems.

This section represents an overall review of PREA allegations made to the Kansas Department of Corrections. Reports are received from anonymous phone hotlines, inmates/residents, staff and third party (family, other inmates/residents, attorneys, etc.) The KDOC investigates all allegations of sexual abuse and/or assault even if the identity of the victim and/or perpetrator is unknown. The amount of data available regarding PREA in the KDOC is growing and more avenues are being created to ensure the most accurate up-to-date data is being shared statewide.

Statewide Population

The following is a snapshot of the offender population within the KDOC as of December 31, 2010 and each year following to December 31, 2015.

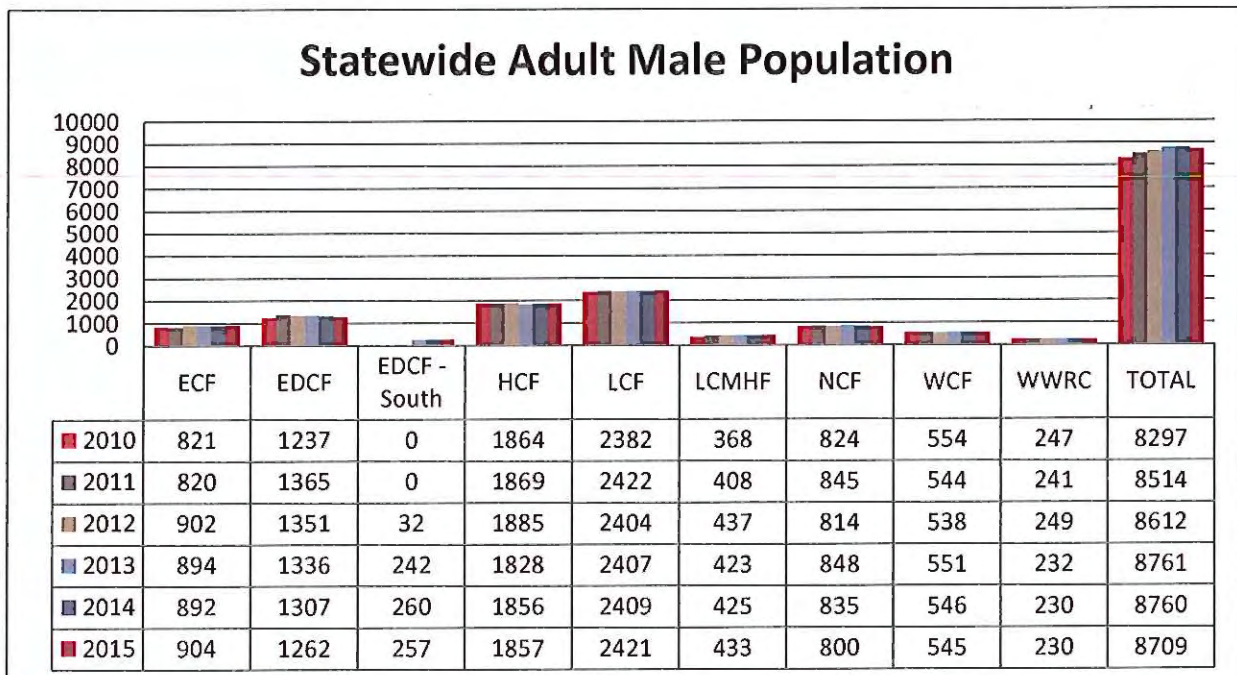


Table 1: Incarcerated Adult Males

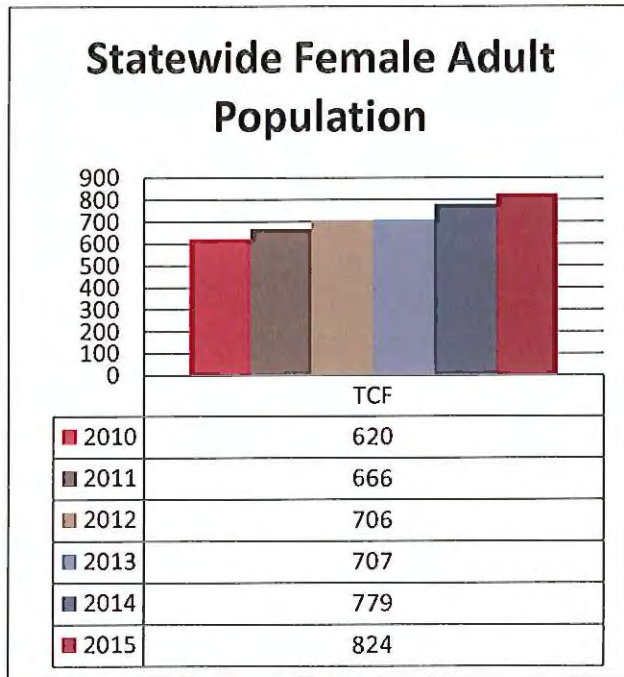


Table 2: Incarcerated Adult Females

These charts depict the growth of the incarcerated population in Kansas. **Table 1 (see page 21)** reflects the adult male population by each of KDOC’s seven adult facilities for the calendar years 2010 to 2015. This table also shows the total statewide male population. There has been an increase of 412 adult male inmates since calendar year 2010.

Table 2 reflects the population change of the KDOC’s one adult female facility from calendar year 2010 to calendar year 2015. There has been an increase of 204 adult female inmates since calendar 2010. This is a .247572 increase (25%) in population.

This upward trend is expected to continue. The Kansas Sentencing Commission projects a need for 1,325 additional male prison beds over the next ten years, and the adult male population is expected to exceed prison capacity by 609 beds by the end of FY2018 (June 30, 2018). Unlike the Federal Bureau of Prisons and many state systems which house approximately 50% person offenders, in Kansas, 75% of the prison population consists of person offenders. Most of the lesser offenders are instead diverted to community sanctions. Many offenders, both in the incarcerated and community setting, struggle with significant behavioral health problems, such as substance abuse and mental illness. In fact, the KDOC has become the largest mental health provider in the state.¹⁰

Internal Classification

The KDOC uses an internal risk screening tool to determine those inmates/residents who would be at a greater risk to be victimized and those who would be at a greater risk to be aggressors. This assessment strengthens KDOC’s ability to provide a safe environment. As a measure of enhanced safety and security for all KDOC offenders, the Internal Classification Checklist is designed to complement custody classification, aid in internal offender management, and provide a means of assessing risk of sexual victimization and abusiveness.

¹⁰ Kansas Department of Corrections Annual Report FY2015 maintained on KDOC’s website <http://www.doc.ks.gov/>. The report is located at <http://www.doc.ks.gov/publications/kdoc-facilities-management/publications/Reports>.

The Kansas Department of Corrections Internal Classification Checklist is designed to complement the custody (or external) classification system, and enhance the agency's ability to internally manage the inmate population. Furthermore, screening information derived from the Internal Classification Checklist shall be used to inform housing, bed, work, education and program assignments for each inmate, with respect to their potential for aggressive behavior and vulnerability to sexual assault. The Internal Classification Checklist is a means to assess for risk of sexual victimization and abusiveness, per PREA (Prison Rape Elimination Act) standards.

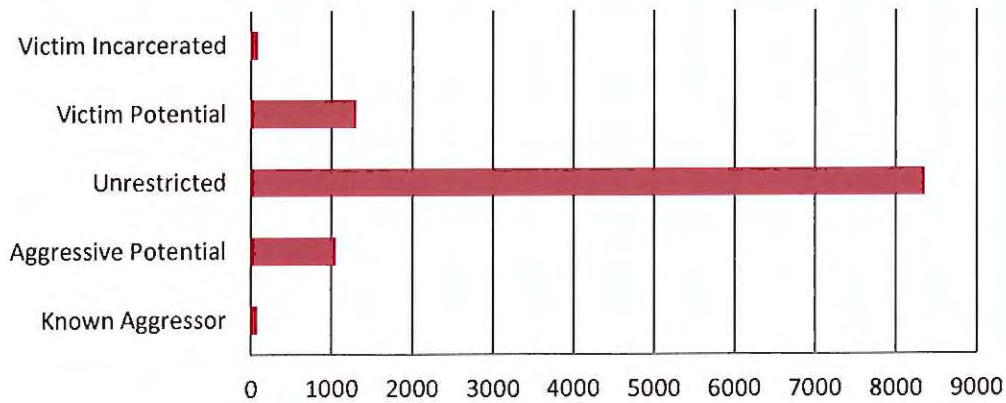
The Internal Classification Checklist process is outlined in IMPP 10-139, Screening for Sexual Victimization and Abusiveness. Ultimately, every inmate will be assigned one of the following scores:

- Victim Incarcerated (**VI**) –individuals have already been a victim of sexual assault inside an institution.
- Victim Potential (**VP**) –individuals have a higher than normal likelihood to be sexually assaulted inside an institution.
- Unrestricted (**UN**) –individuals do not have specific characteristics that fit in any one category type.
- Aggressive Potential (**AP**) –individuals have a higher than normal likelihood to be sexually aggressive inside an institution.
- Known Aggressor (**KA**) –have an established history of institutional sexual aggressive behavior.

The **Table 3** and **Table 4** on the following page (**page 24**) show a breakdown of the internal classification of the adult population in the custody of the Secretary of Corrections. **Table 3** represents number of classification assessments completed in CY2014 and **Table 4** represents the numbers for CY2015.

It should be noted that assessments are completed on every person that enters KDOC. With the number of admissions and discharges throughout the year, these numbers will not match the end of the year population numbers reflected on page 23 and 24. These tables include both male and female populations.

Internal Classification Breakdown for CY2014

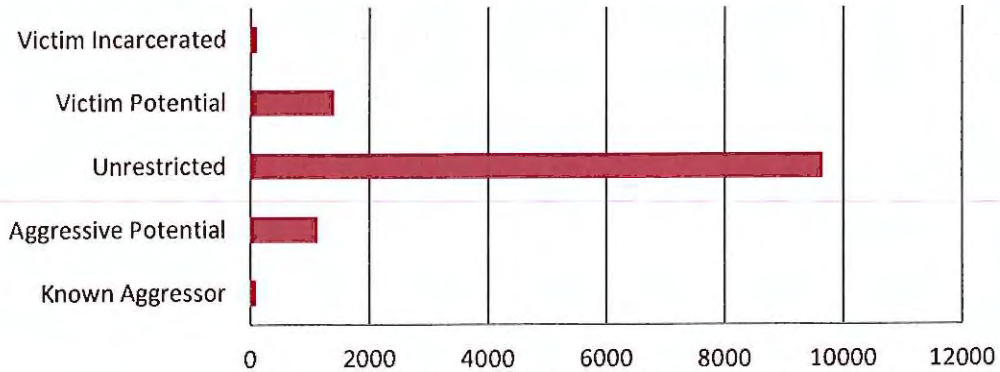


	Known Aggressor	Aggressive Potential	Unrestricted	Victim Potential	Victim Incarcerated
Internal Classification Breakdown for 2014	81	1058	8357	1306	87

Table 3 Statewide number of ICC assessments

CY2014 was the first year KDOC utilized the internal classification.

Internal Classification Breakdown for CY2015



	Known Aggressor	Aggressive Potential	Unrestricted	Victim Potential	Victim Incarcerated
Internal Classification Breakdown for 2015	88	1122	9657	1409	103

Table 4 Statewide number of ICC assessments

The increase in various classifications reflects the increase in the statewide population of adult incarcerated individuals.

Internal Classification by Male Facility: 2015

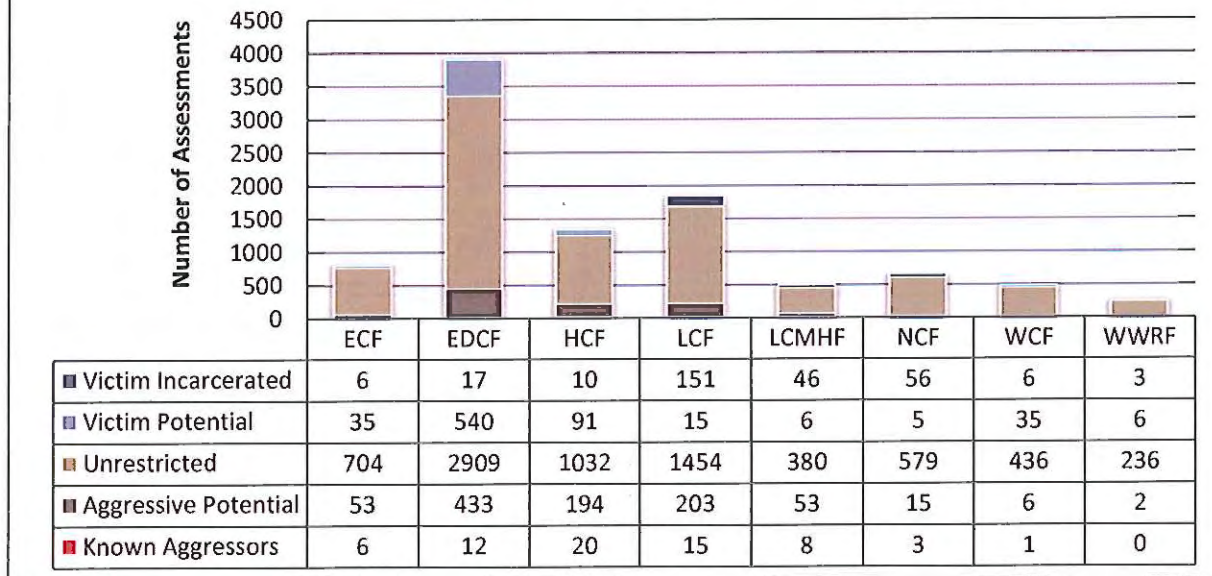
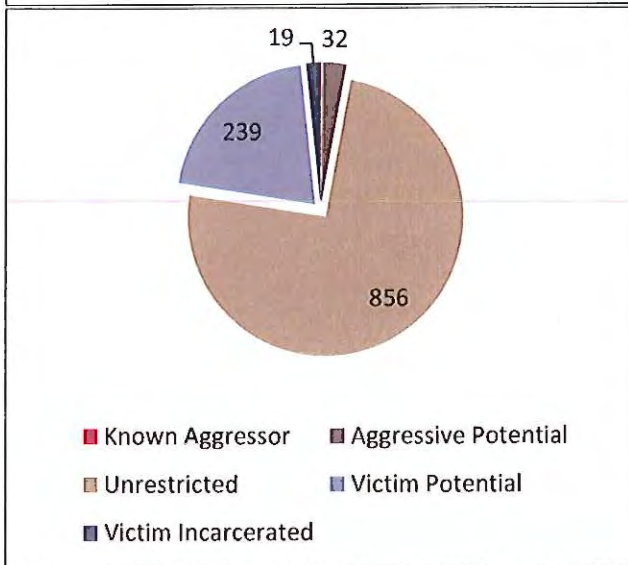


Table 5 Internal Classification by Adult Male Facility

Internal Classification at TCF (Female Facility): 2015



The largest portion of offenders, male and female, incarcerated in the KDOC continues to be Unrestricted –individuals do not have specific characteristics that fit in any one category type.

In the female population there is larger number of victim potentials –individuals have a higher than normal likelihood to be sexually assaulted inside an institution. This corresponds with the gender responsive research when analyzing the pathways women take in entering the criminal justice system.

Table 6 Internal Classification by Adult Female Population

2015 Statewide Cases

The KDOC has 3,644 full time employees. The following tables (Table 7 and Table 8) represent the number of staff on inmate PREA cases statewide which are broken down into two categories. These categories are based on the definitions utilized in reporting cases to the U. S. Department of Justice via the Survey of Sexual Victimization.

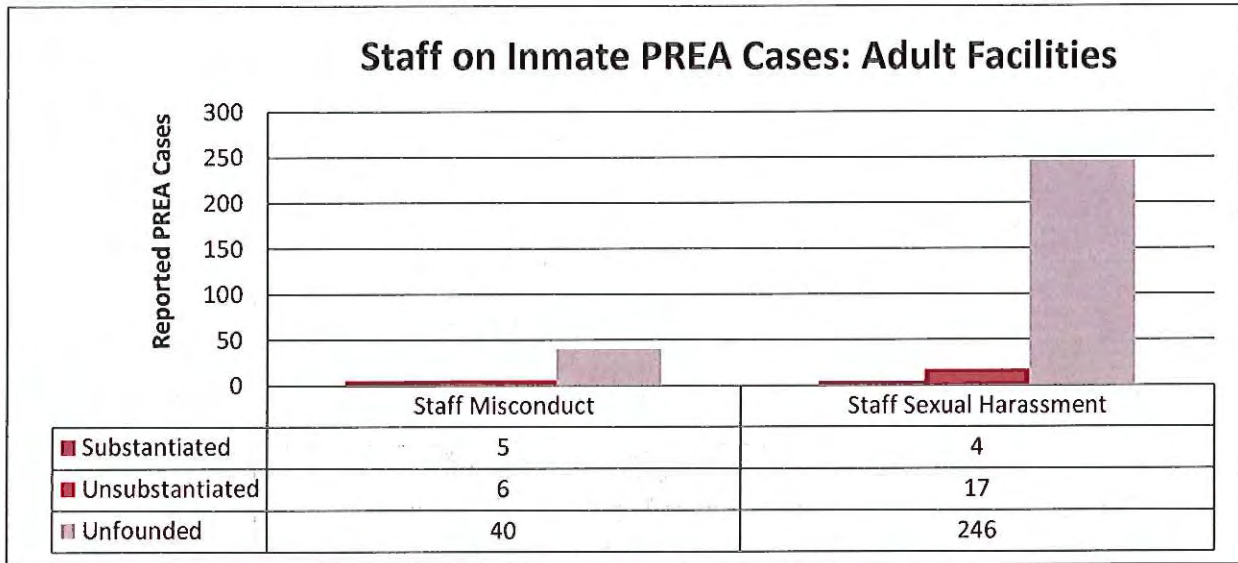
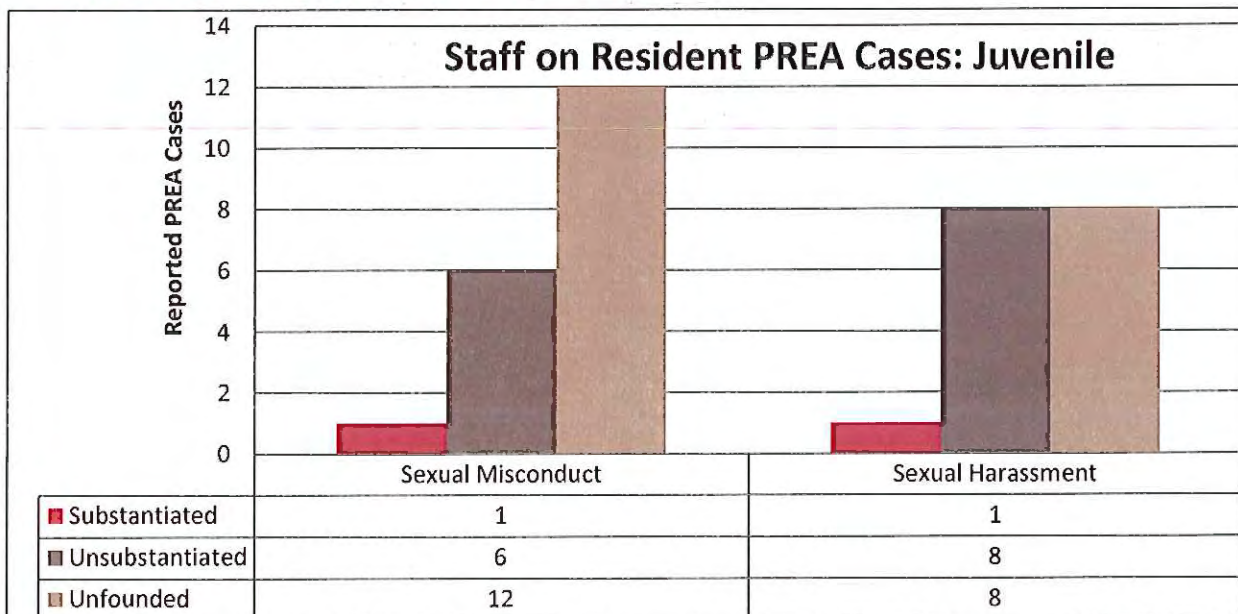


Table 7: Adult facilities located at Ellsworth, El Dorado, Oswego, Lansing, Larned, Hutchinson, Topeka, Norton, Stockton, Winfield and Wichita, Kansas

Table 8: Juvenile facilities located in Larned and Topeka, Kansas



Staff sexual misconduct consists of any behavior or act of sexual nature directed toward an inmate by an employee, volunteer, contractor, official visitor or other agency representative

(excludes family, friends or other visitors.) Sexual relationships of a romantic nature between staff and inmates are included in this definition. Consensual or nonconsensual sexual acts include:

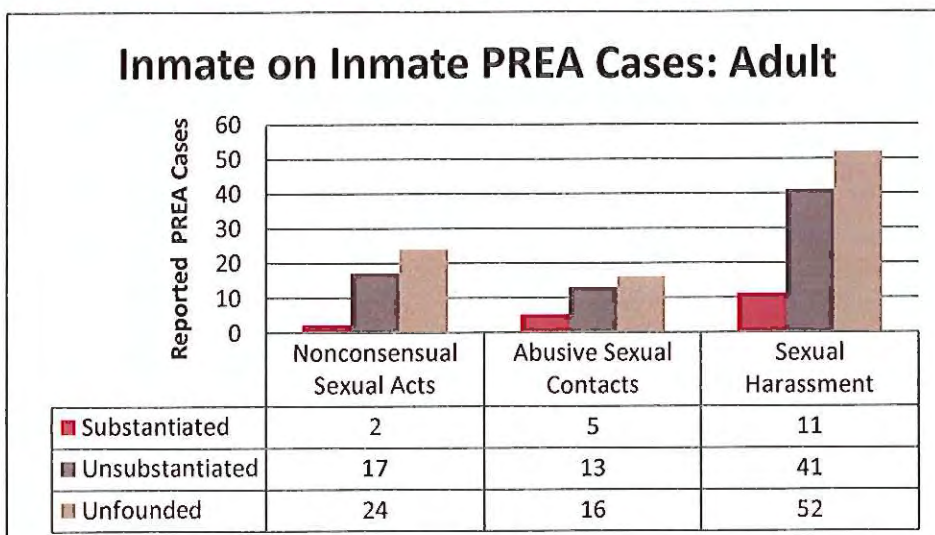
- Intentional touching, either directly or through the clothing of the genitalia, anus, groin, breast, inner thigh, or buttocks that is unrelated to official duties or with the intent to abuse, arouse, or gratify sexual desire;
- Completed, attempted, threatened, or requested sexual acts;
- Occurrences of indecent exposure, invasion of privacy or staff voyeurism for reasons unrelated to official duties or for sexual gratification.

Staff sexual harassment is repeated verbal statements, comments or gestures of a sexual nature to an inmate by an employee, volunteer, contractor, official visitor, or other agency representative (exclude family, friends, or other visitors), including:

- Demeaning references to gender or sexually suggestive or derogatory comments about body or clothing;
- Repeated profane or obscene language or gestures.

The adult population for 2015 was 9,533. This does not include the 107 inmates that are in placed in contracted placements. The juvenile population for 2015 was 234. The following tables (Table 9 and Table 10) represent the number of inmate on inmate and resident on resident PREA cases statewide which are broken down into three categories. These categories are based on the definitions utilized in reporting cases to the U. S. Department of Justice via the Survey of Sexual Victimization.

Table 9: All adult facilities (ECF, EDCF, HCF, LCF, LCMHF, NCF, TCF, and WCF/WWRC)



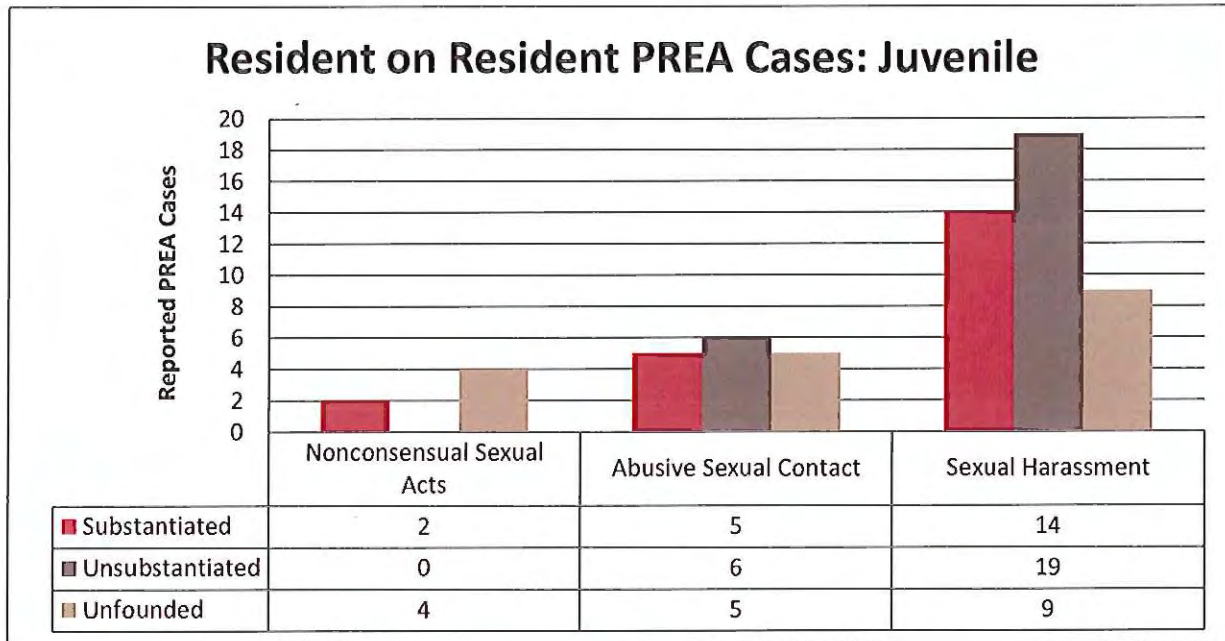


Table 10: Numbers include both LJCF and KJCC (male and female)

Nonconsensual sexual acts include sexual contact of any person without his or her consent or of a person who is unable to consent or refuse. It also includes:

- Contact between the penis and the vulva or the penis and the anus including penetration, however slight;
- Contact between the mouth and the penis, vulva, or anus;
- Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument.

Abusive sexual contact includes sexual contact of any person without his or her consent, or of a person who is unable to consent or refuse. It also includes:

- Intentional touching, either directly or through the clothing, of the genitals, anus, groin, breast, inner thigh or buttocks of any person;
- Excludes incidents in which the contact was incidental to a physical altercation.

Sexual harassment is the repeated and unwanted sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one inmate/resident directed toward another.

2015 PREA Cases by Facility: Adult

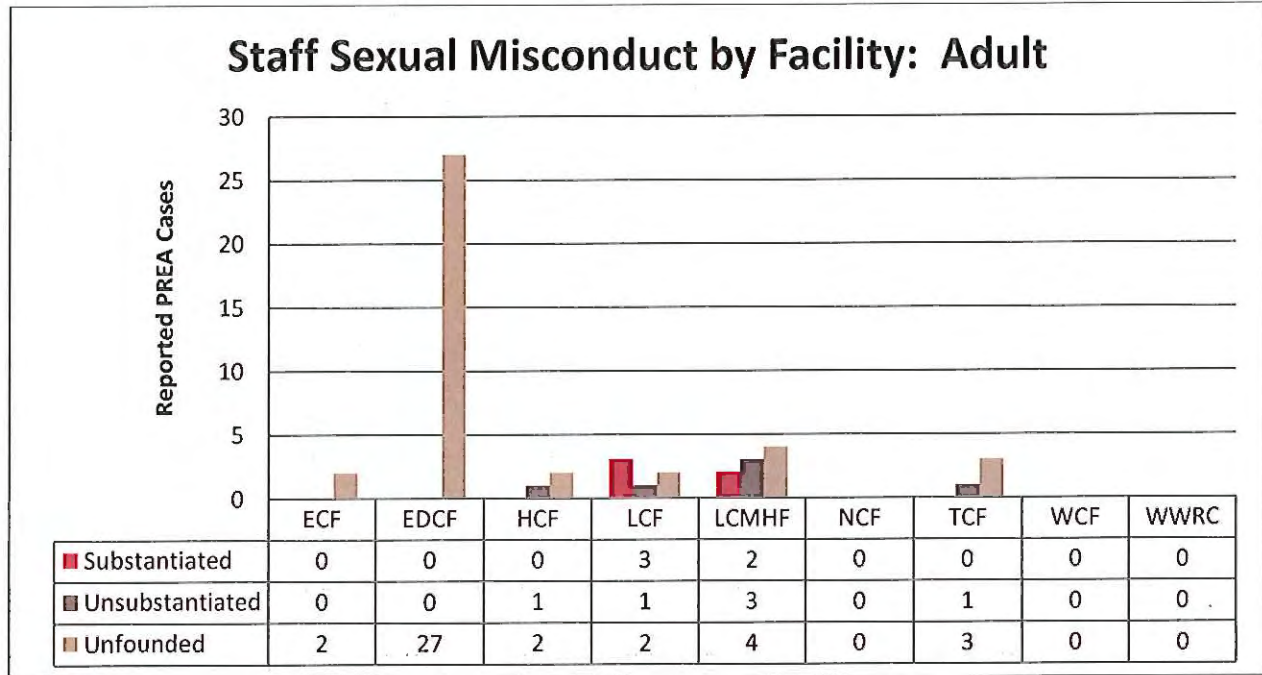


Table 11: Adult facilities

The majority of cases reflected in **Table 11** were allegations of improper touching during pat searches and staff voyeurism. The five cases of substantiated PREA investigations of staff misconduct involved sexual relationships between contract staff and adult male inmates.

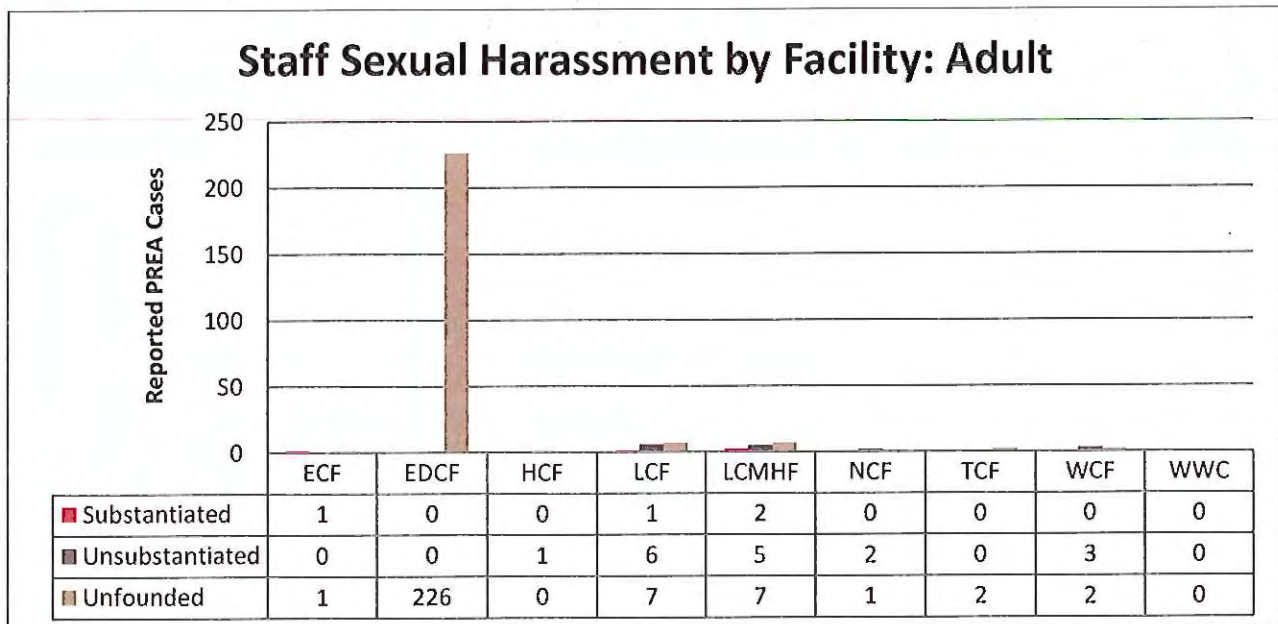


Table 12: Adult facilities

The graph on page 29 (Table 12) shows a disproportionate number of allegations of sexual harassment by staff at the El Dorado Correctional Facility (EDCF). This facility is unique as all allegations made were reported by inmates housed in the facilities long term restrictive housing unit.

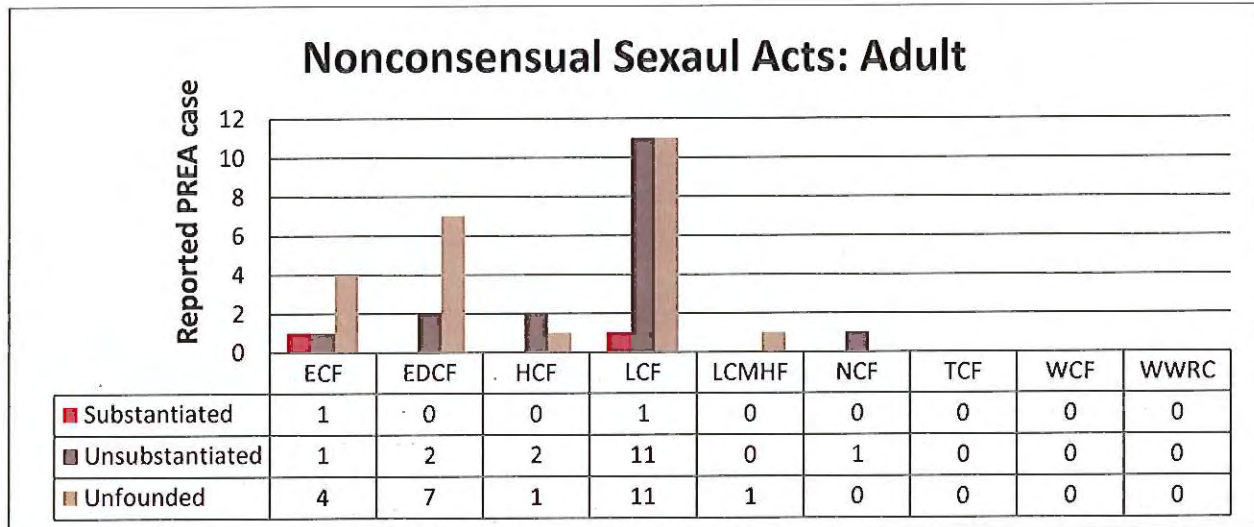


Table 13

The KDOC had two substantiated cases that involved penetration. (See Table 13) Both cases involved Sexual Assault Forensic Exam (SAFE) conducted by a Sexual Assault Nurse Examiner (SANE). While both cases were presented for prosecution, neither case made it to trial.

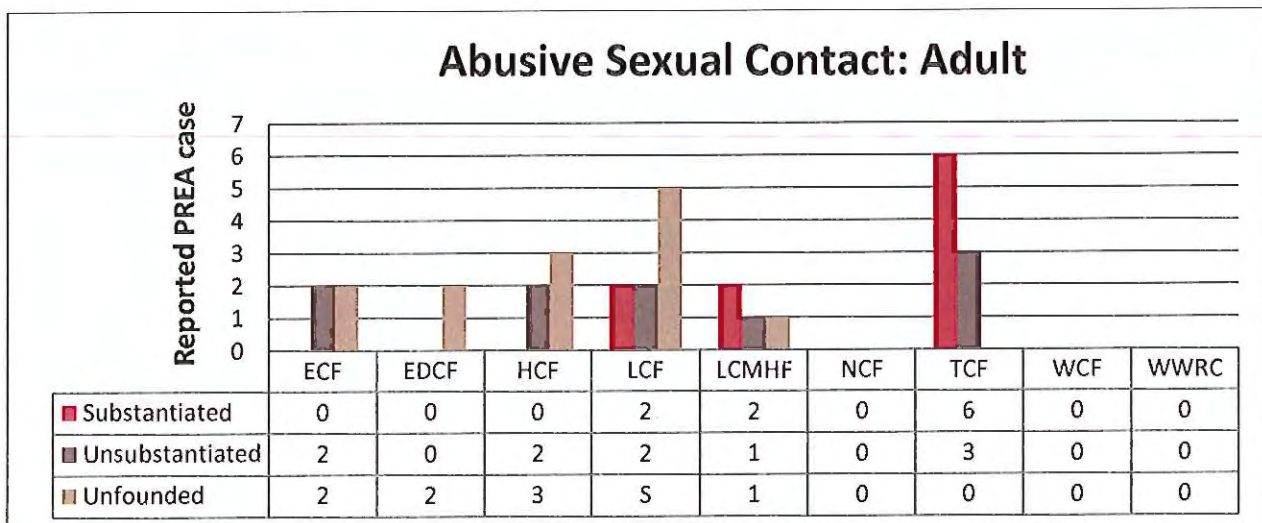


Table 14

All cases listed in the above table (Table 14) involved unwanted touching. Most cases involved contact inside a cell between two cellmates or in a day room during recreation.

2015 PREA Cases by Facility: Juvenile

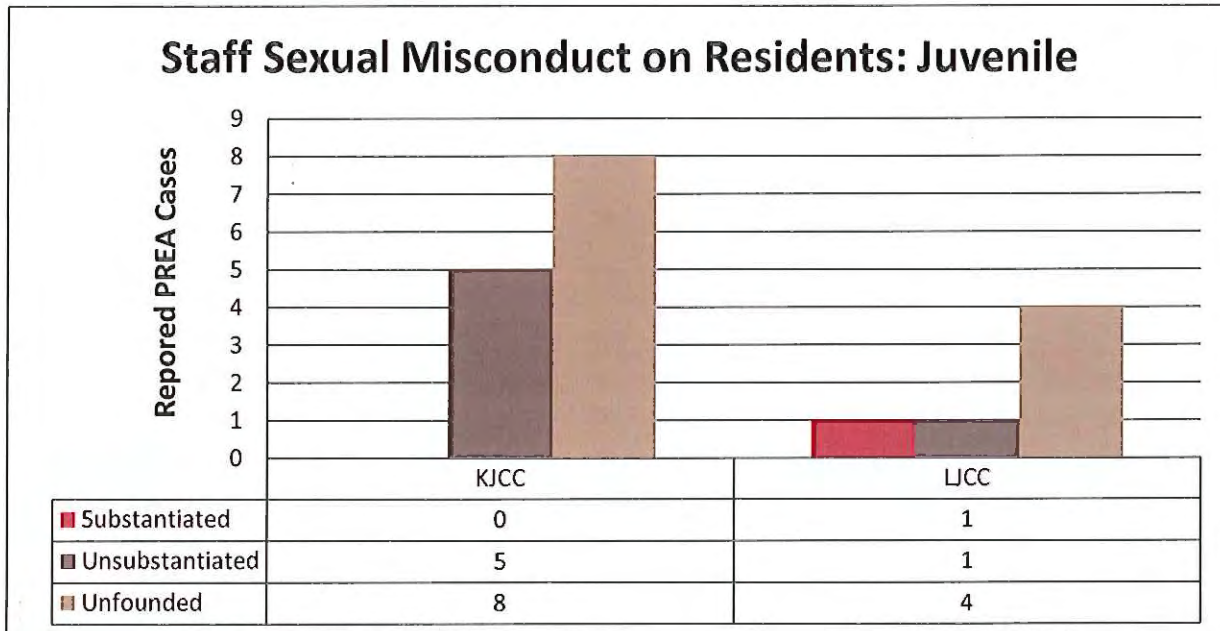


Table 15 Juvenile Facilities

Table 15 reflects one substantiated case of staff sexual misconduct. This case involved a female correctional officer and a male resident. This case has also been referred for prosecution.

Table 16 reflects the cases of staff sexual harassment towards juvenile in KDOC custody. Again, only one substantiated case of sexual harassment which resulted in the termination of that correctional officer.

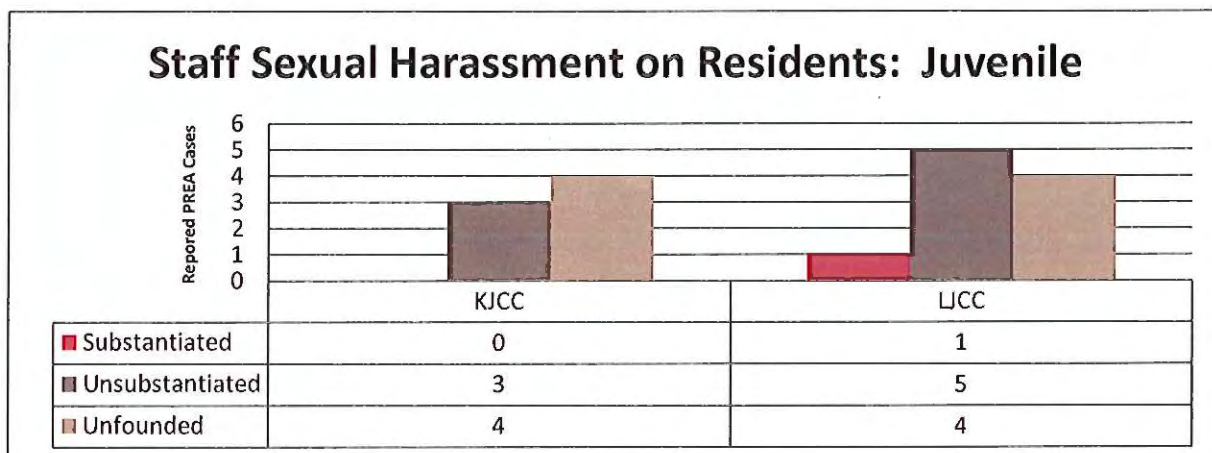


Table 16 Juvenile Facilities

Non Consensual Sexual Acts: Juvenile

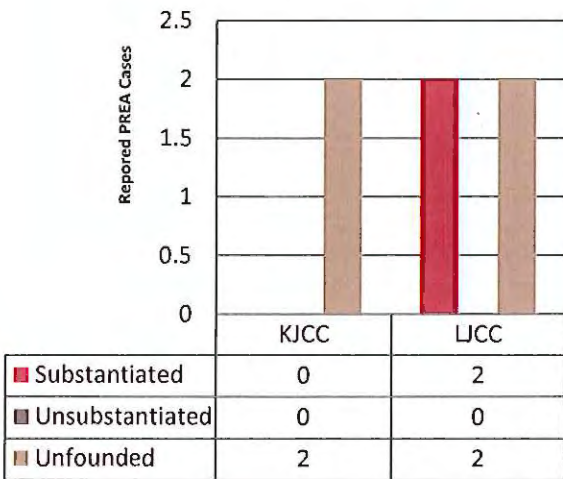


Table 17 Juvenile Facilities

Individuals as young as ten years of age and as old as 17 years of age may be adjudicated as juvenile offenders in Kansas. State law allows KDOC to retain custody of a juvenile offender until the age of 22 ½ in a juvenile correctional facility and the age of 23 in the community.

Sexual Harassment: Juvenile

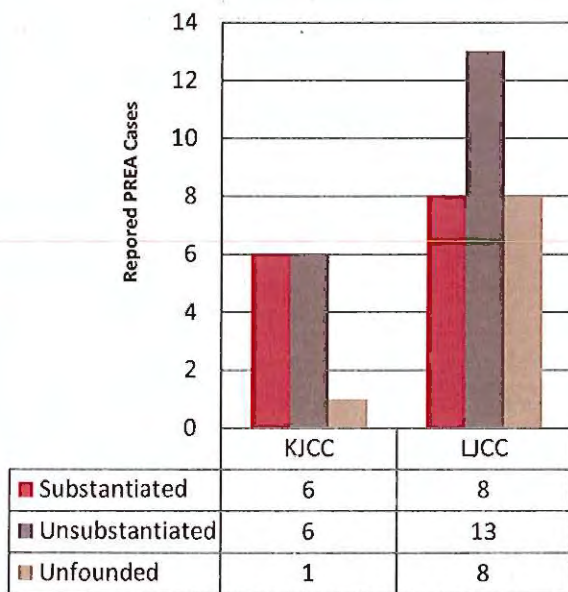


Table 19 Juvenile Facilities

Abusive Sexual Acts: Juvenile

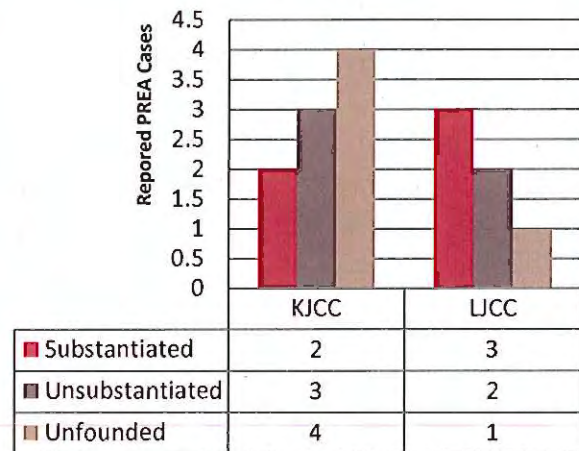


Table 18 Juvenile Facilities

KDOC had two substantiated penetration events occur inside its juvenile facilities. One case resulted in an additional conviction. The case of abusive sexual contact involved unwanted touching (over the clothes) and the majority of the sexual harassment investigations involved a one-time statement of a sexual nature.

Statewide Comparative Data Analysis: Adult

AGGREGATED DATA

The KDOC collects data from the referrals for investigation of sexual abuse and sexual harassment: offender on offender, resident on resident, staff on offender, and staff on resident. That data in this section contains aggregated data as well as six-year comparison between calendar years 2010 and 2015.

All allegations are entered and tracked through a secure electronic database; the EAI (Enforcement, Apprehension, and Investigation Division) Case Log. Information from all KDOC facilities comprises this data, which includes the eight adult correctional facilities and two juvenile correctional facilities:

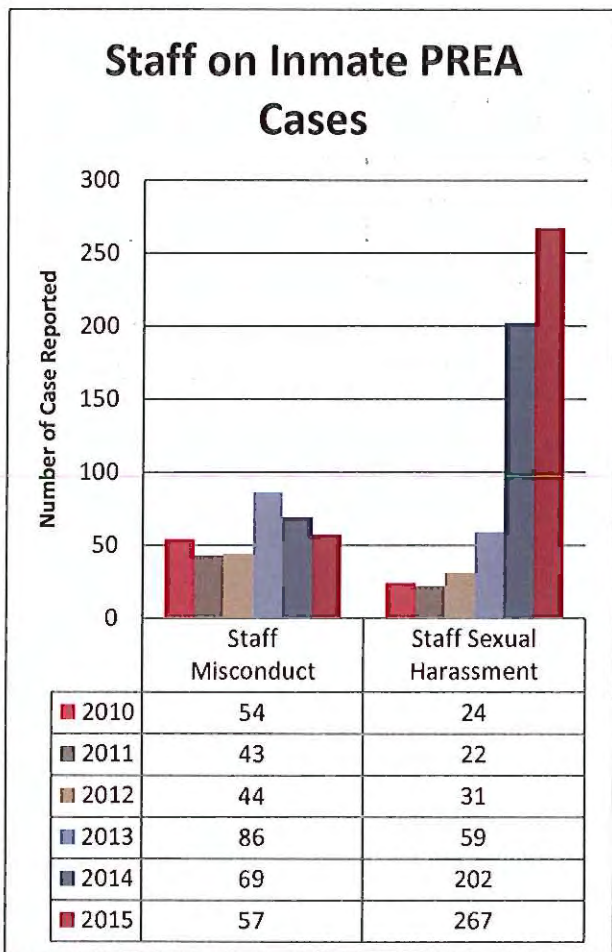


Table 21 Six Year Comparative Analysis

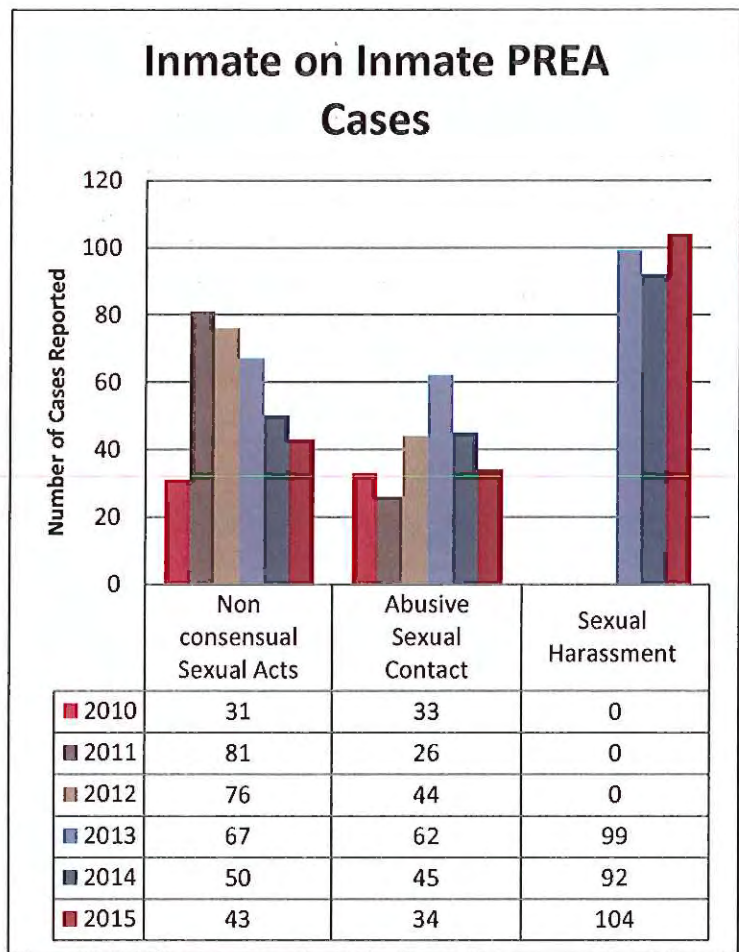


Table 20 Six Year Comparative Analysis

SECTION FOUR: Identified Gaps

§ 115.88 and §115.388 Data review for corrective action.

(a) The agency shall review data collected and aggregated pursuant to §115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by:

- (1) Identifying problem areas;
- (2) Taking corrective action on an ongoing basis; and
- (3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.

(b) Such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.

(c) The agency's report shall be approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means.

CORRECTIVE ACTIONS

The KDOC continues to implement best practice and the requirements of the PREA standards in order to address allegations of sexual abuse and sexual harassment of offenders. Leadership of the KDOC is dedicated to on-going monitoring and corrective action in order to reach full PREA compliance and most importantly to maximize the sexual safety of Kansas correctional facilities. Creating culture change is a long and arduous process. As an agency, the KDOC is steadily and continually making progress toward systemic change that fully integrates the intent of the PREA standards and the highest level of sexual safety.

Agency Level

The following are corrective actions completed since the KDOC 2014 Annual PREA Report at the agency level:

- Revised many policies to enhance PREA policy and practice
- Enhanced education for staff and offenders
- Implemented specialized training required of investigating agents
- Developed and implemented an objective screening tool
- Drafted a new K.A.R. (Kansas Administrative Regulation) 44-15-204 to govern sexual abuse grievances
- Implemented Sexual Abuse Incident Reviews

While great strides and improvement has been made in statewide PREA implementation work still needs to be done. The following are identified remaining gaps:

- Enhanced data collection and aggregation
- Consistency in EAI investigations between facilities
- Issuing DR's to inmates for undue familiarity
- PREA and long term restrictive housing offenders
- Organizational culture varies from facility to facility
- Automating SVA for Juvenile Facilities
- Fidelity of internal classification
- Fidelity of facility level PREA training
- Data collection from contracted placements

Facility Level

The following are the corrective actions completed by each KDOC correctional facility and identified gaps that will be addressed in the coming year:

Ellsworth Correctional Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> Upgraded surveillance and added additional cameras 	Corrective Actions Identified: <ul style="list-style-type: none"> Evaluation of case data entry Fidelity of PREA Classification Fidelity of PREA Training
El Dorado Correctional Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> Installed shower curtains to limit staff viewing of offenders in a state of undress RDU staff complete all internal classification assessment upon entry into KDOC 	Corrective Actions Identified: <ul style="list-style-type: none"> Evaluation of case data entry Fidelity of PREA Classification Fidelity of PREA Training Dedicated PREA Compliance Manager Disproportionally high number of PREA allegations against staff in long term restrictive housing unit
Hutchinson Correctional Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> Implement announcement of cross-gender living units Gender specific post for camera surveillance 	Corrective Actions Identified: <ul style="list-style-type: none"> Evaluation of case data entry Fidelity of PREA Classification Fidelity of PREA Training
Kansas Juvenile Correctional Complex	
Corrective Actions Completed: <ul style="list-style-type: none"> Review of Staffing levels and ratios Upgraded surveillance and added additional cameras 	Corrective Actions Identified: <ul style="list-style-type: none"> Evaluation of case data entry Fidelity of PREA Classification Fidelity of PREA Training
Lansing Correctional Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> Dedicated PREA Compliance Manager who has sufficient time and authority to carry out required duties 	Corrective Actions Identified: <ul style="list-style-type: none"> Evaluation of case data entry Fidelity of PREA Classification Fidelity of PREA Training
Larned Correctional Mental Health Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> Upgraded surveillance and added additional cameras 	Corrective Actions Identified: <ul style="list-style-type: none"> Evaluation of case data entry Fidelity of PREA Classification Fidelity of PREA Training

Larned Juvenile Correctional Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> • Review of Staffing levels and ratios • Upgraded surveillance and added additional cameras 	This facility is in the process of closing. All youth will be moved to KJCC in Topeka
Norton Correctional Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> • Dedicated PREA Compliance Manager who has sufficient time and authority to carry out required duties 	Corrective Actions Identified: <ul style="list-style-type: none"> • Evaluation of case data entry • Fidelity of PREA Classification • Fidelity of PREA Training
Topeka Correctional Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> • Gender responsive training • Installed mesh windows for increase supervision and monitoring • Began work with an outside consultant to develop a gender-responsive internal classification tool 	Corrective Actions Identified: <ul style="list-style-type: none"> • Evaluation of case data entry • Fidelity of PREA Classification • Fidelity of PREA Training
Winfield Correctional Facility/Wichita Work Release Facility	
Corrective Actions Completed: <ul style="list-style-type: none"> • Dedicated PREA Compliance Manager who has sufficient time and authority to carry out required duties • Increased communication and collaboration with EAI 	Corrective Actions Identified: <ul style="list-style-type: none"> • Evaluation of case data entry • Fidelity of PREA Classification • Fidelity of PREA Training

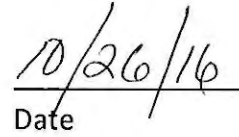
The KDOC is making significant progress toward full PREA compliance in the areas of prevention, detection and response to incidents of sexual abuse and harassment. Responses to reports of sexual abuse have been standardized statewide and goals are in place to close any remaining identified gaps.

With enhancements in quality control, data collection and on-going technical assistance, the KDOC has begun to pinpoint specific areas of focus in order to maximize agency resources and outcomes for PREA.

The KDOC is committed to continual and progressive culture change and continues to implement the requirements of the PREA standards and make adjustments on an on-going basis. In doing so, the KDOC is eager to raise the bar in the confidence and integrity of our system statewide.



Joe Norwood, Secretary of Corrections



Date