

GLADES COUNTY SHERIFF'S OFFICE

PROCEDURAL GENERAL ORDER	EFFECTIVE DATE 10-01-2010	RESCINDS/AMENDS 02-25-16	NUMBER 720.13
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REFERENCE: (PREA) SEXUAL ABUSE AND ASSAULT PREVENTION AND INTERVENTION PROGRAM

INDEX AS: SEXUAL ABUSE AND ASSAULT PREVENTION AND INTERVENTION PROGRAM

DISTRIBUTION: ALL PERSONNEL

POLICY:

The facility shall establish standards as defined by the Prison Rape Elimination Act of 2003 (Public Law 108-79 Sept. 04, 2003). These standards are established for the reduction and punishment of sexual abuse of inmates; to address the safety and treatment needs of inmates who have been a victim of a sexual act; and to discipline and prosecute those who perpetrate these acts upon inmates. The Glades County Sheriff's Office Detention Division has a zero tolerance towards all forms of sexual abuse and sexual harassment in the facility.

The Glades County Sheriff's Office Detention Division is committed to the safety of any individual confined to agency custody or lodged in a correctional facility. The agency also has a zero-tolerance standard for sexual abuse involving inmate-on-inmate behaviors and staff-on-inmate behaviors. The agency will respond to all reports of sexualized behavior or abuse as nonconsensual, regardless of perception, rumor, appearance, or participant disclosure.

Federal Prison Rape Elimination Act (PREA), 2003; Standards for the Prevention Detection, Response, and Monitoring of Sexual Abuse in Adult Prisons and Jails.

Definitions and definitions of prohibited behaviors regarding sexual abuse and sexual harassment:

Contractor – a person who provides services on a recurring basis pursuant to a contractual agreement with the agency.

Employee – a person who works directly for the agency.

Exigent circumstance – any set of temporary and unforeseen circumstances that require immediate action in order to combat a threat to the security or institutional order of a facility.

Gender nonconforming – a person whose appearance or manner does not conform to traditional societal gender expectations.

Inmate – any person incarcerated or detained in a prison or jail.

Intersex – a person who's sexual or reproductive anatomy or chromosomal pattern does not seem to fit typical definitions of male or female. Intersex medical conditions are sometimes referred to as disorders of sexual development.

Jail – a confinement facility of a Federal, State, or local law enforcement agency whose primary use is to hold person pending adjudication of criminal charges, persons committed to confinement after adjudication of criminal charges for sentences of one year or less, or

person adjudicated guilty who are awaiting transfer to a correctional facility.

Pat-down – means a running of hands over the clothed body of an inmate, detainee, or resident by an employee to determine whether the individual possesses contraband.

Staff – employee

Strip search – a search that requires a person to remove or arrange some or all clothing so as to permit a visual inspection of the person's breasts, buttocks, or genitalia.

Transgender – a person whose gender identity (i.e. internal sense of feeling male or female) is different from the person's assigned sex at birth.

Substantiated allegation – an allegation that was investigated and determined to have occurred.

Unfounded allegation – an allegation that was investigated and determined not to have occurred.

Unsubstantiated allegation – an allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

Volunteer – an individual who donates time and effort on a recurring basis to enhance the activities and programs of the agency.

Youthful inmate – any person under the age of 18 who is under adult court supervision and incarcerated or detained in a prison or jail.

Sexual abuse includes –

- (1) Sexual abuse of an inmate or detainee by another inmate or detainee; and
- (2) Sexual abuse of an inmate or detainee by a staff member, contractor, or volunteer.

Sexual abuse of an inmate or detainee by another inmate or detainee includes any of the following acts, if the victim does not consent, is coerced into such act by open or implied threats of violence, or is unable to consent or refuse:

- (1) Contact between the penis and the vulva or the penis and anus, including penetration however slight;
- (2) Contact between the mouth and the penis, vulva, or anus;
- (3) Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument; and
- (4) Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breasts, inner thigh, or the buttocks of another person, excluding contact incidental to a physical altercation.

Sexual abuse of an inmate or detainee by a staff member, contractor, or volunteer includes any of the following acts, with or without consent of the inmate or detainee:

- (1) Contact between the penis and the vulva or the penis and anus, including penetration however slight;
- (2) Contact between the mouth and the penis, vulva, or anus;
- (3) Contact between the mouth and any body part where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;
- (4) Penetration of the anal or genital opening, however slight, by a hand, finger, object, or other instrument, that is unrelated to official duties or where the staff member, contractor,

- or volunteer has the intent to abuse, arouse, or gratify sexual desire;
- (5) Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, that is unrelated to the official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;
- (6) Any attempt, threat, or request by a staff member, contractor, or volunteer to engage in the activities described in paragraphs (1) – (5) of this section;
- (7) Any display by a staff member, contractor, or volunteer of his or her uncovered genitalia, buttocks, or breasts in the presence of an inmate or detainee, and
- (8) Voyeurism by a staff member, contractor, or volunteer.

Voyeurism by a staff member, contractor, or volunteer – an invasion of privacy of an inmate or detainee, by staff for reasons unrelated to official duties, such as peering at an inmate who is using the toilet in his or her cell to perform bodily functions; requiring an inmate to expose his or her buttocks, genitalia, or breasts; or taking images of all or part of an inmate’s naked body or of an inmate performing bodily functions.

Sexual harassment includes –

- (1) Repeated and unwelcomed sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one inmate or detainee directed toward another; and
- (2) Repeated verbal comments or gestures of a sexual nature to an inmate or detainee by a staff member, contractor, or volunteer, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.

I. Prevention Planning

A. §115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

- 1. The Glades County Sheriff’s Office Detention Division has a Zero Tolerance toward all forms of sexual abuse and sexual harassment in this facility. **(115.11 (a)-1)**
- 2. This policy will outline how the Glades County Sheriff’s Office Detention Division will implement the agency’s Zero Tolerance approach to preventing, detecting, and responding to sexual abuse and sexual harassment. **(115.11 (a)-2)**
- 3. Definitions of prohibited behaviors regarding sexual assault and sexual harassment **(115.11 (a)-3):**
 - a) Sexual Assault - nonconsensual oral, anal, or vaginal penetration by or union with, the sexual organ of another or by any other object; or the touching of the private body parts of another person (including the genitalia, anus, groin, breast, inner thigh, buttocks, or mouth) for the purpose of sexual gratification.
 - b) Sexual Misconduct - Any behavior or act of a sexual nature, directed toward anyone by another person. Sexual misconduct includes, but is not limited to: acts, threats, requests for sexual acts, or attempts to commit acts such as sexual harassment, sexual contact, obscenity, behavior of a sexual nature or implication of the same, inappropriate sexual comments, taking or soliciting photographs/pictures of a person’s nude breasts, genitalia or buttocks, indecent exposure, invasion of privacy for sexual gratification, sexually harassing comments or language, inappropriate touching or incidents of intentional touching of the genitalia, anus, groin, breast, inner thigh, or buttocks or other body parts with the intent of abuse, arouse, or gratify sexual desire or incidents of indecent exposure of breasts, genital areas, or other body parts, even with consent in a penal institution.

- c) Inmate to Inmate Non-Consensual Sexual Acts - Contact of any person without his or her consent, or of a person who is unable to consent or refuse such as contact between the penis and the vagina or the penis and the anus including penetration, however slight; Contact between the mouth and the penis, vagina, or anus; Penetration of the anal or genital opening of another person by hand, finger or other object.
- d) Inmate on Inmate-One or more inmates engaging in, attempting to engage in, or having completed a sexual act with another inmate through the use of threats, intimidation, force or other actions and/or communications reasonably calculated to cause submission of another inmate to engage in a sexual act against that inmate's will.
- e) Sexual Abuse-Abuse by another inmate or a staff member, contractor, or volunteer when the victim does not consent and is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse.
- f) Sexual Abuse by another inmate includes:
 - i. Contact between the penis and the vulva or the penis and the anus, including penetrations, however slight.
 - ii. Contact between the month and penis, vulva, or anus.
 - iii. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument.
 - iv. Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person.
- g) Sexual Abuse by a staff member, contractor, or volunteer includes:
 - i. Contact between the penis and the vulva or the penis and the anus, including penetrations, however slight.
 - ii. Contact between the mouth and penis, vulva, or anus.
 - iii. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument.
 - iv. Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person.
- h) Sexual touching by a staff member, contractor, or volunteer which includes:
 - i. Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person, with the intent to abuse, arouse, or gratify sexual desire.
 - ii. Any attempted, threatened, or requested sexual touching by a staff member, contractor, or volunteer.
 - i) Indecent exposure by a staff member, contractor, or volunteer which includes:
 - i. Displays by a staff member, contractor, or volunteer of their uncovered genitalia, buttocks, or breast in the presence of an inmate.
 - j) Voyeurism by a staff member, contractor, or volunteer that involves an invasion of an inmate's privacy by staff for reasons unrelated to official duties such as:
 - i. Peering at an inmate who is using a toilet in their cell to perform bodily functions.
 - ii. Requiring an inmate to expose their buttocks, genitals or breast or taking images of all or part of an inmate's naked body or of an inmate performing bodily functions, regardless of what the staff member does with the images afterwards.

- k) Sexual Battery—FSS 794.011 means oral, anal or vaginal penetration by, or union with the sexual organ of another or the anal or vaginal penetration by any other object, however, sexual battery does not include an act done for a bona fide medical purpose.
 - l) Sexual Violence—Any instance of non-consensual sexual acts or abusive sexual contact.
 - m) Sexual Harassment-Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one inmate, detainee, or resident directed toward another; and repeated verbal comments or gestures of a sexual nature to an inmate, detainee, or resident by a staff member, contractor, or volunteer, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.
 - n) Voyeurism by staff, contractors, or volunteers - Invasion of privacy of an inmate by staff for reasons unrelated to official duties, such as peering at an inmate performing bodily functions, requiring an inmate to expose his or her buttocks, genitals or breasts, or taking images of all or part of an inmate's naked body or of an inmate performing bodily functions.
4. Disciplinary Sanctions-for those found to have participated in prohibited behaviors:
(115.11 (a)-4)
- a) Glades County Sheriff's Office Detention Division staff members, contractors, or volunteers, will be subjected to disciplinary sanctions up to and including termination for violating the sexual abuse and sexual harassment policies.
 - b) Staff that has engaged in sexual abuse can be terminated.
 - c) All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to GCSO Administration and Internal Investigations Unit, unless the activity was clearly not criminal, and to any relevant licensing bodies.
 - d) Other disciplinary sanctions for violating the sexual abuse or sexual harassment policy that does not include actually engaging in sexual abuse will be based on the following:
 - i. The nature and circumstances of the acts committed.
 - ii. The staff member's disciplinary history.
 - iii. The sanctions imposed for similar offenses by other staff with similar histories.
 - e) Any contractor or volunteer who engages in sexual abuse will be prohibited from contact with inmates and will be reported to GCSO Administration.
 - f) The Glades County Sheriff's Office will take appropriate remedial measures, in considering whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policy by a contractor or volunteer, the facility will consider whether to prohibit further contact with inmates.
 - g) Inmates will be subject to disciplinary sanctions through a formal disciplinary process following:
 - i. An administrative finding that the inmate engaged in Inmate-on-Inmate sexual abuse.

- ii. Following a criminal finding of guilt for Inmate-on-Inmate sexual abuse.
5. Inmate disciplinary sanctions will take in consideration the following:
 - a) The nature and circumstances of the abuse committed.
 - b) The inmate's disciplinary history.
 - c) The sanctions imposed for similar offenses by other inmates with similar histories.
 - d) Inmates' mental disabilities or mental illness.
 6. The Jail will discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.
 7. An inmates' report of sexual abuse made in good faith and based on reasonable belief will not be disciplined for falsely reporting an incident or lying, even if the investigation does not establish evidence sufficient to substantiate the allegation.
 8. The Glades County Sheriff's Office prohibits all sexual activity between inmates and will discipline inmates for any such activities.
 9. The Glades County Sheriff's Office will not deem the activity as sexual abuse if it was not coerced.
 10. This policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of inmates. **(115.11 (a)-5)**
 11. The Glades County Sheriff's Office designates a PREA Coordinator. The PREA Coordinator is an upper-level, agency-wide person with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards within the facility. **(115.11 (b)-1)**
 12. The PREA Coordinator will be an upper-level position with sufficient time and authority to develop, implement, and oversee the Jail efforts to comply with PREA standards. The PREA Coordinator is tasked with auditing, collecting and maintaining information on each instance of alleged inmate-on inmate sexual acts or abusive sexual contact, and each instance of staff-on-inmate sexual misconduct or sexual harassment. A designee may be assigned in periods of Coordinators absence. **(115.11 (b)-2)**
 13. The Director of Operations, (Detention Major), is designated as the PREA Coordinator and is identified in the agency's organizational structure. **(115.11 (b)-3)**
 14. The Chief of Security, (Detention Captain), is designated as the PREA Compliance Manager. **(115.11 (c)-1)**
 15. The PREA Compliance Manager has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. **(115.11 (c)-2)**
 16. The PREA Compliance Manager is in the agency's organizational structure. **(115.11 (c)-3)**
 17. The PREA Compliance Manager reports directly to the Detention Division Major or his/her designee in the Detention Division Major's absence. **(115.11 (c)-4)**

B. § 115.12 Contracting with other entities for the confinement of inmates

1. Any contract entered into for the confinement of inmates after August 20, 2012, or since the last PREA audit, whichever is later, require:
 - a) All of the contractors to adopt and comply with PREA standards. **(115.12 (a)-1)**
 - b) All contracts require the agency to monitor the contractor's compliance with PREA standards. **(115.12 (a)-2)**

C. § 115.13 Supervision and Monitoring

1. The Glades County Sheriff's Office will develop, document, and make the best efforts to comply on a regular basis with a staffing plan that provides adequate levels of staffing, and where applicable, video monitoring to protect inmates against sexual abuse. A facility Post Chart will be maintained denoting officer assignment for all authorized positions. **(115.13 (a)-1)**
2. In circumstances where the staffing plan is not complied with, the facility shall document and justify all deviations from the Post Chart. **(115.13 (b)-1)**
 - a) The Shift OIC will document their staff post assignments on GCSO Form 100, (Post List and Shift Report). Deviations of post assignments, from the approved Post Chart, will be identified with justifications for the actions taken.
3. At least once every year the facility, in collaboration with the PREA Coordinator, reviews the staffing plan to see whether adjustments are needed in: **(115.13 (c)-1)**
 - a) The staffing plan
 - b) The deployment of monitoring technology
 - c) The allocation of agency/facility resources to commit to the staffing plan to ensure compliance.
4. Supervisors will conduct unannounced supervisor rounds of the Jail daily to identify and deter staff sexual abuse and sexual harassment. **(115.13 (d)-1)**
 - a) Each unannounced round is documented as a computer entry in the jail log and in the Shifts After Action Reports. The entry will be logged as "PREA UNANNOUNCED ROUNDS". All supervisor rounds will be recorded utilizing this code. **(115.13 (d)-2)**
 - b) The unannounced supervisor rounds are to be conducted on both day and night shifts and will cover all areas of the facility. **(115.13 (d)-3)**
 - c) Staff are prohibited from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility. **(115.13 (d)-4)**

D. § 115.14 Youthful inmates

1. Youthful inmates will not be placed in any housing unit or facility locations within sight, sound, or physical contact with any adult inmate through the use of a shared dayroom or other common space, shower area, or sleeping quarters. **(115.14 (a)-1)**
2. Refer to GCSO Policy 670.01 Juvenile Operations and GCSO Policy 720.05 Admission, Classification and Release of Juveniles.

E. § 115.15 Limits to cross-gender viewing and searches

1. Staff will announce “Male on the Floor” or “Female on the Floor” each time an Officer of the opposite gender enters an inmate’s housing unit; to inform inmates that an officer of the opposite gender will be on the floor. **(115.15 (d)-2)**
2. Inmates will be allowed to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). **(115.15 (d)-1)**
3. A certified detention member of the same sex shall perform searches of inmates/detainees upon admission.
4. Glades County Sheriff’s Office Detention Division employees will not conduct cross-gender strip searches or cross-gender visual body cavity searches (anal or genital opening) except in exigent circumstances or when performed by a medical practitioner. **(115.15 (a)-1)**
5. The facility shall document all cross-gender strip searches and cross-gender visual body cavity searches, and shall document all cross-gender pat-down searches of female inmates.
6. The Agency does not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. **(115.15 (b)-1)**
7. The facility will not restrict female inmates’ access to regularly available programs or other out of cell opportunities based on the inability to perform cross-gender pat-down searches. **(115.15 (b)-2)**
8. All cross-gender strip searches and cross-gender visual body cavity searches shall be documented. **(115.15 (c)-1)**
9. All cross-gender pat-down searches of female inmates shall be documented. **(115.15 (c)-2)**
10. Pat Searches and Strip Searches of Transgender / Intersex inmates/detainees will be Processed, documented and performed as follows:
 - a) In cases of searching transgendered and/or intersex inmates/detainees, a Statement of Search / Shower Preference GCSO Form 236 will be completed by the transgender/intersex person during intake, choosing to have a male, female or both conduct the search.
 - b) The Officer performing the pat search should be of the same sex as identified by the transgender/intersex inmate on the Statement of Search / Shower Preference Form.
 - c) When a strip search is required for a transgender/intersex inmate, the search will be conducted by an officer and overseen by a supervisor or witnessing officer per the Statement of Search / Shower Preference Form as signed by the inmate. The officer, supervisor or witnessing officer will be of the same sex that is listed on the completed form.
 - d) Strip searches will never be performed as a punitive measure – ZERO TOLERANCE.
 - e) Staff will not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate’s genital status. **(115.15 (e)-2)**

- f) If the genital status is unknown, it may be determined during conversations with the inmate, reviewing medical records, or as part of a broader medical examination conducted in private by medical personnel requiring approval of Detention Administration.
- g) The Officers and Health Services provider must attempt to communicate with the inmate for the cooperation in determining gender for the purpose of housing and additional inmate services without resorting to a physical examination. If the inmate refuses to cooperate, the inmate will be housed in a single cell by themselves until a review team communicates and attempts to receive confirmation. A metal detector may be utilized to scan the inmate prior to placement in a holding cell.
 - 1. A Review Team may be utilized for this process consisting of the following or their designees:
 - i. Medical Health Services Administrator or Mental Health Counselor
 - ii. Operations Security Captain (PREA Compliance Manager)
 - iii. Shift Supervisor
 - iv. ICE representative, if appropriate
- c) The shift supervisor is responsible for notifying medical staff that a transgender/intersex inmate/detainee has been identified at intake.
- d) Security staff will conduct these searches in a professional and respectful manner. The searches will be conducted in the least intrusive manner possible consistent with security needs, and only if a search needs to occur based exigent circumstances. All transgender/intersex searches will be documented in an incident report.
- e) The security of the facility, staff and inmate's safety must be maintained at all times.

F. § 115.16 Inmate with disabilities and inmates who are limited English proficient

- 1. The following procedures have been established to provide disabled inmates equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. All inmate education materials will be in formats accessible to all inmates in accordance with Title II of the Americans with Disabilities Act, 28 CFR 35.164. **(115.16 (a)-1) (115.16 (b)-1)**
 - a) Interpreter services for the deaf or hard of hearing inmates
 - b) Interpreter services for Non-English speaking inmates
 - c) Reading of the material, by staff, to inmates
- 2. The agency will not rely on inmate interpreters, inmate readers or other types of inmate assistants except in limited circumstances, and must be fully documented, where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations. **(115.16 (c)-1) (115.16 (c)-2)**

G. § 115.17 Hiring and Promotion decisions

1. Glades County Sheriff's Office agency policy prohibits hiring or promoting anyone who may have contact with inmates and prohibits enlisting the services of any contractor who may have contact with inmates who: **(115.17 (a)-1)**
 - a) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C 1997)
 - b) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, open or implied threats of force, or coercions, or if the victim did not consent or was unable to consent or refuse
 - c) Has been civilly or administratively adjudicated to have engaged in the activity described in any paragraph in this section.
2. The agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone or to enlist the services of any contractor, who may have contact with inmates. **(115.17 (b)-1)**
3. Before this agency hires any new employees who may have contact with inmates, it: **(115.17 (c)-1)**
 - a) Conducts criminal background record checks
 - b) Consistent with federal, state, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.
4. This agency requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with inmates. **(115.17 (d)-1)**
5. Criminal background records checks will be conducted by the Human Resources Department on all current employees, volunteers, and contractors, who may have contact with inmates at least every five (5) years. **(115.17 (e)-1)**
6. The agency shall ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as a part of reviews of current employees. The agency shall impose upon employees a continuing affirmative duty to disclose any such misconduct.
7. Employees must disclose any such misconduct. Any material omission(s) regarding such misconduct, or the provision of materially false information, shall be grounds for termination. **(115.17 (g)-1)**
8. Any information requested of a current or previous employee by a prospective employer will be supplied by Human Resources.
9. Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

H. § 115.18 Upgrades to facilities and technology

1. The GCSO will consider the effect of the design, acquisition, expansion or modification in

reference to the Jail's ability to protect inmates from sexual abuse during any planned expansions, modifications, or video equipment updates to the facility. **(115.18 (a)-1)**

2. When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse. **(115.18 (b)-1)**

II. RESPONSIVE PLANNING

A. § 115.21 Evidence protocol and forensic medical examinations

1. The Glades County Sheriff's Office is responsible for conducting administrative or criminal sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct.) **(115.121 (a)-1)**
2. When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol. **(115.21 (a)-3)**
3. The GCSO Investigative Unit's evidence protocol will be based on the most recent edition of the U.S. Department of Justice's Office on Violence against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents", or similarly comprehensive and authoritative protocols developed after 2011. **(115.21 (b)-1)**
4. All victims of sexual abuse will be offered access to forensic medical examinations. Such examinations will be offered without financial cost to the victim. Forensic Examinations will be conducted at a local hospital or by appropriately trained clinicians at the Abuse Counseling & Treatment Center, (ACT) in Ft. Myers, Florida. **(115.21 (c)-1) (115.21 (c)-2)**
5. Examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). **(115.21 (c)-3)**
 - a) When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations. **(115.21 (c)-4)**
 - b) The facility will document efforts to provide SANEs or SAFEs. **(115.21 (c)-5)**
6. The facility attempts to make available to the victim a victim advocate from a rape crisis center, in person or by other means. All of these efforts are fully documented. **(115.21 (d)-1) (115.21 (d)-2)**
((ACT) Abuse Counseling & Treatment Center, Hotline: 239-939-3112)
7. If and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member. **(115.21 (d)-3)**
8. If requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals. **(115.21 (e)-1)**

B. § 115.22 Policies to ensure referrals of allegations for investigations

1. The Glades County Sheriff's Office ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including inmate-on-inmate sexual abuse or staff sexual misconduct). **(115.22 (a)-1)**
2. Allegations of sexual abuse or sexual harassment must be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. **(115.22 (b)-1)**
3. This policy and any other regarding the referral of allegations of sexual abuse or sexual harassment for a criminal investigation is published on the agency website or made publicly available via other means. **(115.22 (b)-2)**
4. All referrals of allegations of sexual abuse or sexual harassment for criminal investigations must be documented. **(115.22 (b)-3)**

III. TRAINING AND EDUCATION

A. § 115.31 Employee Training

1. The agency trains all employees who have contact with inmates on the following matters: **(115.31 (a)-1)**
 - a) Agency's zero-tolerance policy for sexual abuse and sexual harassment.
 - b) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.
 - c) The right of inmates to be free from sexual abuse and sexual harassment.
 - d) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment.
 - e) The dynamics of sexual abuse and sexual harassment in confinement.
 - f) The common reactions of sexual abuse and sexual harassment victims.
 - g) How to detect and respond to signs of threatened and actual sexual abuse.
 - h) How to avoid inappropriate relationships with inmates.
 - i) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender-nonconforming inmates.
 - j) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
2. Training is tailored to address both gender of the inmates in the facility. **(115.31 (b)-1)**
3. Between training sessions, employees are provided with information about current policies regarding sexual abuse and harassment. **(115.31 (c)-2)**
4. The agency documents employee annual refresher training in their individual training record and by signature sign in sheets. **(115.31 (c)-3 & (d)-1)**

B. § 115.32 Volunteer and Contractor training

1. All volunteers and contractors, who have contact with inmates, will be trained on their responsibilities under the agency's Prison Rape Elimination Act (PREA) policy. The type and level of training is based on the services they provide and level of contact they have with inmates. **(115.32 (a)-1) (115.32 (b)-1)**
2. All volunteers and contractors who have contact with inmates have, at the very least, been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. **(115.32 (b)-2)**
3. Documentation confirming that the volunteers/contractors understand the training they receive is kept on file with the agency. **(115.32 (c)-1)**

C. § 115.33 Inmate Education

1. All inmates, during intake, will receive Intake orientation explaining the facility zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. **(115.33 (a)-1)**
 - a) A sexual assault awareness pamphlet is provided to each inmate during intake containing information on self-protection and prevention techniques, treatment and counseling, and reporting methods.
 - 1) On duty OIC or designated booking staff shall be responsible for detainee education regarding issues pertaining to sexual abuse and assault.
 - 2) Inmates/detainees will receive instruction/orientation covering facility policy and procedures; to include detainee rules and regulations, sexual abuse and avoidance,
 - 3) All areas covered during orientation will be signed off by the detainee and the designated staff member presenting the material on GCSO Form 139, Detainee Handbook and Orientation Program Acknowledgement. This signed form will be electronically attached to the detainee's jail book file.
 - b) Posters containing sexual assault awareness and reporting information are posted in the intake area and throughout all areas of the facility.
2. Inmate PREA education is available in accessible formats for all inmates including those who are: **(115.33 (d)-1)**
 - a) Limited English proficient
 - b) Deaf
 - c) Visually impaired
 - d) Otherwise disabled
 - e) Limited in their reading skills
3. Within 30 days of intake, the agency shall provide comprehensive education to new inmates/detainees either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. Inmates/detainees will be required to sign documentation of inmate participation in PREA

education sessions. **(115.32 (e)-1)**

4. In addition to providing such education, the agency shall ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats. **(115.32 (f)-1)**

D. § 115.34 Specialized Training: Investigations

1. Investigators who investigate allegations of sexual abuse are trained in conducting sexual abuse investigations in confinement settings. **(115.34 (a)-1)**
2. The specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in a confinement setting, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.
3. The agency maintains documentation showing that investigators have completed the required training. **(115.34 (c)-1)**

E. § 115.35 Specialized training: Medical and Mental Health care

1. Agency medical staff does not conduct forensic exams. Forensic exams will be conducted at a local hospital or at the Abuse Counseling & Treatment Center in Fort Myers, Florida. **(115.35 (b)-1)**
2. All security and Medical Staff will be trained on the proper procedures for securing a crime scene and preserving evidence in exigent circumstances to include:
 - a) Crime scene security
 - b) Crime scene log
 - c) Evidence handling
 - d) Evidence packaging
 - e) Chain of custody
3. The agency shall ensure all full-and part-time medical and mental health care practitioners who work regularly at the agency receive the training mandated for contractors and volunteers under §115.32, depending on the practitioner's status at the agency. The agency will maintain documentation the training was received.

IV. SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

A. § 115.41 Screening for risk of victimization and abusiveness

1. All inmates will be screened during intake, using an objective screening instrument for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. The PREA Inmate Screening / Risk Assessment Form GCSO, Form # 230, shall be completed on all inmates/detainees entering the Jail. The information collected during the initial screening will be used to determine the inmate's/detainee's risk of victimization or abusiveness and to ensure the safety of each inmate/detainee in the facility. **(115.41 (a)-1)**
(115.34 (b)-1)
2. The PREA Intake Screening/Risk Assessment Form shall be completed by Contract Medical Staff and the Booking Supervisor (or designee).

a) The PREA Intake Screening/Risk Assessment Form shall be completed by Contract Medical Staff and the Booking Supervisor (or designee).

- 1) Medical Staff will utilize a discreet verbal interview and complete the top portion of the form and then provide it to the booking staff member for completion.
- 2) Booking staff will complete the bottom section utilizing verbal interviews, booking documents, transfer documents and/or any other processing materials available with relative information.
- 3) Blank forms will be maintained and made readily available in Booking.
- 4) Completed Risk Assessment forms will be routed as identified on the form.

3. The intake screening will consider at the minimum the following: **(115.41 (c)-1)**

- a) Whether the inmate has a mental, physical, or developmental disability.
- b) Age of the inmate.
- c) Physical build of the inmate.
- d) If the inmate has previously been incarcerated.
- e) If the inmate's criminal history is exclusively nonviolent.
- f) If the inmate has prior convictions for sex offenses against an adult or child.
- g) If the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming.
- h) If the inmate has previously experienced sexual victimization.
- i) The Inmate's own perception of vulnerability.
- j) If the inmate is detained solely for civil immigration.
- k) If the inmate has any prior acts of sexual abuse.
- l) If the inmate has prior convictions for violent offenses.
- m) If the inmate has a history of prior institutional violence or sexual abuse, as known to the agency.

4. Based on the answers provided and the inmate's own perceptions of vulnerability: a determination for the inmates' housing is made during intake. If the inmate feels comfortable in general population, the inmate will be placed in a housing unit. If the inmate feels uncomfortable being placed in general population, the inmate will be housed on Administrative Confinement until seen and evaluated by the PREA Compliance Manager and/or Classification; unless required by a medical practitioner to be housed in the Medical Unit.

5. Inmates/detainees refusing to answer or not disclose complete information during the screening process may not be disciplined. Inmates/detainees refusing to disclose information during the screening process will be referred to the PREA Compliance Manager and if necessary Contract Medical Staff, for a follow-up interview. Follow-up interviews shall be completed within 72 hours of the initial intake process. Documentation of a refusal to disclose information shall be noted in the PREA Intake Screening/Risk Assessment Form and by Jail Book Incident Report.
6. An inmate's risk level shall be reassessed at any time and when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. **(115.41 (g)-1)**
7. Inmates will not be disciplined for refusing to answer, or for not disclosing complete information in response to questions asked during the risk screening relating to the following questions: **(115.41 (h)-1)**
 - a) Whether the inmate has a mental, physical, or developmental disability.
 - b) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming.
 - c) Whether the inmate has previously experienced sexual victimization
 - d) The inmate's own perception of vulnerability.
8. The agency shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to inmate screening, in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates.
9. The intake screening will take place during the intake process at the facility. Additional assessment by classification or the PREA Compliance Manager's designee within 30 days from the inmate's arrival, based upon any additional relevant information received by the facility since the intake screening. **(115.41 (f)-1)**

B. § 115.42 Use of screening information

1. Information from the risk screening will be used to determine housing, bed, work, education, and program assignments to prevent inmates with the high risk of being sexually victimized from those at the risk of being sexually abusive. **(115.42 (a)-1)**
2. The agency makes individualized determinations about how to ensure the safety of each inmate. **(115.42 (b)-1)**
3. The agency makes housing and program assignments for transgender or intersex inmates in the facility on a case-by-case basis to ensure the inmates' health and safety; and whether the placement would present management or security problems. **(115.42 (c)-1)**
4. Placement and programming assignments for transgender or intersex inmates shall be reassessed at least twice each year to review any threats to the inmates' safety.
5. A transgender or intersex inmates' own views with respect to his or her own safety shall be given serious consideration.
6. Transgender or intersex inmates shall be given the opportunity to shower separately from other inmates.

7. The PREA Compliance Manager or designee will assess all transgender or intersex inmates for housing to include:
 - a) Does the inmate feel comfortable being housed in general population?
 - b) What gender of inmates does the inmate feel comfortable being housed with?
 - c) Does the inmate feel comfortable showering around other inmates?
 - d) Does the inmate prefer to shower away from other inmates?
 - e) Transgender or intersex inmates who prefer to shower separately will be taken to Medical and allowed to shower in the Medical hallway shower.
 - f) Transgender or intersex inmates in general population can submit a request to the Shift OIC to request a change in housing or showering status.
 - g) Lesbian, gay, bisexual, transgender or intersex inmates shall not be placed in dedicated facilities, units or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit or wing established in connection with a consent decree, legal settlement or legal judgment for the purpose of protecting such inmates.

C. § 115.43 Protective Custody

1. Inmates/detainees at high risk for sexual victimization will not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. **(115.43 (a)-1)**
2. Inmates/detainees placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document: **(115.43 (b)-1)**
 - a. The opportunities that have been limited.
 - b. The duration of the limitation.
 - c. The reasons for such limitations.
3. If an involuntary segregated housing assignment is made, the facility shall clearly document:
 - a. The basis for the facility's concern for the inmates' safety.
 - b. The reason why no alternative means of separation can be arranged.
4. An incident report will be completed on all inmates Inmates/detainees placed in involuntary segregated housing.
 - a. The Chief of Security and the PREA Coordinator will review all incident reports and determine if the need for continued segregated housing is required.
 - b. If the inmate/detainee is to remain in involuntary segregated housing, the Chief of Security will formally document the reason the individual will remain in segregated housing, any limitations to programs, education and work opportunities, the duration of the limitations and why the limitations are placed based on the safety of the individual and security of the

facility. The information will be made part of the inmate/detainee formal file.

5. County and USM inmates in involuntary segregated housing will be reviewed at least every 30 days by Classification and the PREA Compliance Manager to determine whether there is a continuing need for separation from the general population. **(115.43 (e)-1)**
6. ICE Detainee victims shall not be involuntarily held for longer than five days in any type of administrative segregation, except in highly unusual circumstances or at the request of the detainee.
 - a) A detainee victim who is in protective custody after having been subjected to sexual abuse shall not be returned to the general population until completion of a proper re-assessment, taking into consideration any increased vulnerability of the detainee as a result of the sexual abuse.
 - b) The facility shall notify the appropriate ICE Field Office Director whenever an ICE detainee victim has been held in administrative segregation for 72 hours.
 - c) Upon receiving notification that a detainee victim has been held in administrative segregation, the ICE Field Office Director shall review the placement and consider:
 - (1) Whether the placement is only as a last resort and when no other viable housing options exist; and
 - (2) In cases where the detainee has been held in administrative segregation for longer than 5 days, whether the placement is justified by highly unusual circumstances or at the detainee's request.

V. REPORTING

A. § 115.51 Inmate/Detainee reporting

1. The Glades County Sheriff's Office Detention Division allows for internal reporting, by inmates/detainees, to report privately to agency officials about: **(115.51 (a)-1)**
 - a) Sexual abuse or sexual harassment.
 - b) Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; and
 - c) Staff neglect or violation of responsibilities that may have contributed to such incidents.
2. The multiple internal reporting methods inmates can utilize, are:
 - a) Verbal Reporting
 - b) Request Forms
 - c) Grievance Forms
 - d) GCSO Internal PREA HOTLINE by Dialing # 9
 - e) Abuse Counseling & Treatment Center (ACT) Toll Free Hotline # 1-888-956-7272 or 333# or write to: Abuse Counseling & Treatment (ACT), P.O. Box # 20401, Fort Myers, FL 33906

- f) National Sexual Abuse Hotline- 1-800-656-4673 (toll free, non-recorded line)
 - g) ICE's Community & Detainee Hotline at # 1-888-351-4024 or 9116# or ICE's Joint Intake Center at 1-877-246-8253 or 5663# or write to Department of Homeland Security, Office of the Inspector General, 245 Murray Drive SE. Building 410, Washington, DC 20528
5. The agency provides ways for inmates/detainees to report abuse or harassment to a public or private entity or office that is not part of the agency by: **(115.51 (b)-1)**
 - a) External Confidential PREA HOTLINE by Dialing "0", then pressing "1".
 - b) This will provide access to a hotline maintained and monitored outside the jurisdictional control of the agency by designated officials from the Hendry County Sheriff's Office.
 6. Inmates detained solely for civil immigration purposes must be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security. **(115.51 (b)-2)**
 7. Staff must accept reports of sexual assault and sexual harassment made verbally, in writing, anonymously, and from third parties. **(115.51 (c)-1)**
 8. Staff is required to immediately document verbal reports. **(115.51 (c)-2)**
 9. Glades County Sheriff's Office Detention Division Staff can privately report sexual abuse and sexual harassment of inmates/detainees to their Supervisor or any other facility Supervisor. **(115.51 (d)-1)**
 10. Staff is informed of these procedures in the following ways: **(115.51 (d)-2)**
 - a) Classroom training
 - b) Supervisory briefings
 - c) Training bulletins
 - d) Policies
 - e) Procedural Memorandums

B. § 115.52 Exhaustion of administrative remedies

1. The agency has an administrative procedure for dealing with inmate grievances regarding sexual abuse. **(115.52 (a)-1)**
2. Agency policy allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred. **(115.52 (b)-1)**
3. Inmates are not required to use an informal grievance process, or otherwise to attempt to resolve with staff, an alleged incident of sexual abuse. **(115.52 (b)-2)**
4. Inmates may submit a grievance alleging sexual abuse without submitting said grievance to the staff member who is the subject of the complaint. **(115.52 (c)-1)**
5. Any inmate grievance alleging sexual abuse shall not be referred to the staff member who is the subject of the complaint. **(115.52 (c)-2)**

6. The Glades County Sheriff's Office Detention Division Administration will issue a final decision on the merits of any portion of a grievance alleging sexual abuse within 5 days of the initial filing of the grievance. **(115.52 (d)-1)**
7. The Detention Division Administration may claim an extension of time to respond up to 30 days, if the normal time period for response is insufficient to make an appropriate decision. **(115.52 (d)-5)**
8. If an extension is needed, the inmate will be notified in writing. The notification will also include a date by which a decision will be made. **(115.52 (d)-6)**
9. Agency policy and procedure permits third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates. **(115.52 (e)-1)**
10. If the inmate declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the inmate's decision to decline. **(115.52 (e)-2)**
11. The agency has a policy and an established procedure for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse. (Follow procedures outlined in Grievance Procedures Policy) **(115.52 (f)-1)**
12. Emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours. **(115.52 (f)-2)**
14. Emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within five (5) days. **(115.52 (f)-5)**
15. After an agency decision is made, a copy of the emergency grievance and all responses shall be forwarded to the PREA Coordinator.
16. The agency shall only discipline an inmate for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith. **(115.52 (g)-1)**

C. § 115.53 Inmate/Detainee access to outside confidential support services

1. Inmates are provided with access to outside victim advocates for emotional support services related to sexual abuse by: **(115.53 (a)-1)**
 - a) Giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available, for local, state, or national victim advocacy or rape crisis organizations.
 - b) Giving inmates mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes.
 - c) Enabling reasonable communication between inmates and these organizations in as confidential a manner as possible.
2. The facility informs inmates, prior to giving them access to outside support services, the extent to which such communications will be monitored. **(115.53 (b)-1)**
3. The facility informs inmates, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for

disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant federal, state, or local law. **(115.53 (b)-2)**

4. The agency shall maintain or attempt to enter into memoranda of understanding (MOU) or other agreements with community service providers. **(115.53 (c)-1) (115.53 (c)-3)**
5. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements. **(115.53 (c)-2) (115.53 (c)-4)**

D. § 115.54 Third-party reporting

1. The agency provides a method to receive third-party reports of inmate sexual abuse or sexual harassment by posting reporting information and contact numbers on the agency's website. **(115.54 (a)-1)**
2. The agency publicly distributes information, on the agency website, on how to report inmate sexual abuse or sexual harassment on behalf of inmates. **(115.54 (a)-2)**
3. The agency posts contact numbers and reporting information in the lobby and visitation entrance to the facility for public viewing.

VI. OFFICIAL RESPONSE FOLLOWING AN INMATE REPORT

A. § 115.61 Staff and agency reporting duties

1. All staff are required to report immediately any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, even if that facility is not the Glades County Sheriff's Office Detention Division. **(115.61 (a)-1)**
2. All staff are required to immediately report any retaliation against inmates or staff who report such incidents. **(115.61 (a)-2)**
3. All staff are required to immediately report any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. **(115.61 (a)-3)**
4. Apart from reporting to the designated supervisors or officials and designated state or local services agencies, staff is prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decision. **(115.61 (b)-1)**
5. Unless otherwise precluded by Federal, State or local law, medical and mental health practitioners shall be required to report sexual abuse to the appropriate officials and to inform inmates of their duty to report; and the limitations of confidentiality at the initiation of services.
6. If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable person's statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.
7. The facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators.

B. § 115.62 Agency protection duties

1. When the agency or facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the inmate (i.e. it takes some action to assess appropriate protective measures without unreasonable delay.) **(115.62 (a)-1)**

C. § 115.63 Reporting to other confinement facilities

1. Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency/facility where sexual abuse is alleged to have occurred. **(115.63 (a)-1)**
2. The facility head will provide such notification as soon as possible, but no later than 72 hours after receiving the allegation. **(115.63 (b)-1)**
3. The Glades County Sheriff's Office Detention Division will fully document that it provided such notification within 72 hours of receiving the allegation. **(115.63 (c)-1)**
4. The Glades County Sheriff's Office Detention Division is required to fully investigate allegations received from other facilities/agencies. **(115.63 (d)-1)**

D. § 115.64 Staff first responder duties

1. First responder procedures for allegations of sexual abuse: **(115.64 (a)-1)**
 - a) Separate the alleged victim and abuser.
 - b) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
 - The first Officer on the scene has the responsibility to secure, preserve, and control access to and from the crime scene.
 - The crime scene should be secure in such a way that no one other than law enforcement personnel has access to the scene. It is always an advantage to rope off to much than not enough because you can always reduce the scene but it is hard to expand it once the scene has been contaminated.
 - Secure cell or dorm door is appropriate.
 - Rope off crime scene area with crime scene tape (rope off larger area than actual crime scene)
 - Initiate and maintain crime scene sign in log
 - Control of the crime scene shall be the responsibility of the first officer on scene until relieved. Restrict access to the scene to only staff actively involved in the investigation process and/or evidence identification and recovery. A crime scene log must be maintained by the controlling Officer documenting anyone who enters the scene. Allow as few people as necessary to enter the scene.
 - c) If the abuse occurred within a time period that still allows for the collection of physical evidence, staff will request that the alleged victim will be requested not to take any action that could destroy physical evidence; including washing, brushing teeth, changing clothes, urinating, defecating, drinking or eating.
 - d) If the abuse occurred within a time period that still allows for the collection of physical evidence, staff will ensure that the alleged abuser not take any action that could destroy

physical evidence; including washing, brushing teeth, changing clothes, urinating, defecating, drinking or eating.

2. If the first staff responder is not a security staff member, that responder shall be required to:
(115.64 (b)-1)
 - a) Request that the alleged victim not take any actions that could destroy evidence.
 - b) Immediately notify security staff.
3. Shift OIC response:
 - a) The on-duty Shift Supervisor shall ensure the first responder actions have been met and direct the required notifications from that point forward.
 - b) Ensure alleged inmate victim and alleged inmate aggressor are separated; if housed together.
 - c) Ensure alleged inmate victim is evaluated by Medical. If requested by the victim, attempt to make available to the victim, a victim advocate from a rape crisis center, in person or by other means. (All of these efforts are fully documented.) **(Abuse Counseling & Treatment Center, Hotline: 239-939-3112)**
 - c) Ensure alleged inmate aggressor is seen and evaluated by Medical.
 - d) Regardless of whether the complaint involves an inmate-on-inmate or staff-on-inmate allegation, the Shift Supervisor will make the designated command staff notifications and provide for the immediate protection for the victim.
 - e) If the alleged perpetrator is a staff member, remove the staff member from any inmate contact/areas and place the individual in a no-inmate contact duty post pending the initial investigation by CID/IA and review by the Corrections Division Chief or designee.
 - f) If the Sexual Misconduct allegation is criminal in nature, contact GCSO Communications and request a Patrol Division Deputy be notified and requested to respond to the incident location to take the initial report as soon as possible.
 - g) Ensure the ICE/ERO Supervisor is notified of the incident.
 - h) Ensure the investigator(s) receive assistance as needed (e.g. transport the victim to the appropriate medical examination facility, facilitate access to the crime scene, coordinate access to other inmates, etc.).
 - i) Coordinate the transportation and supervision of the alleged victim to the identified Certified Rape Crisis Center for medical forensic examination and evaluation as appropriate.
(Reference appendix A – Abuse Counseling & Treatment Center / Ft. Myers, FL. 239-939-3112)
 - j). Ensure the following documentation is completed and forwarded thru the Chain of Command:
 - 1). Incident reports
 - 2). Pictures (attached to incident report) (if applicable).
 - 3). Memorandum (if applicable)
 - 4). Email (if applicable)
 - 5). Booking face sheet

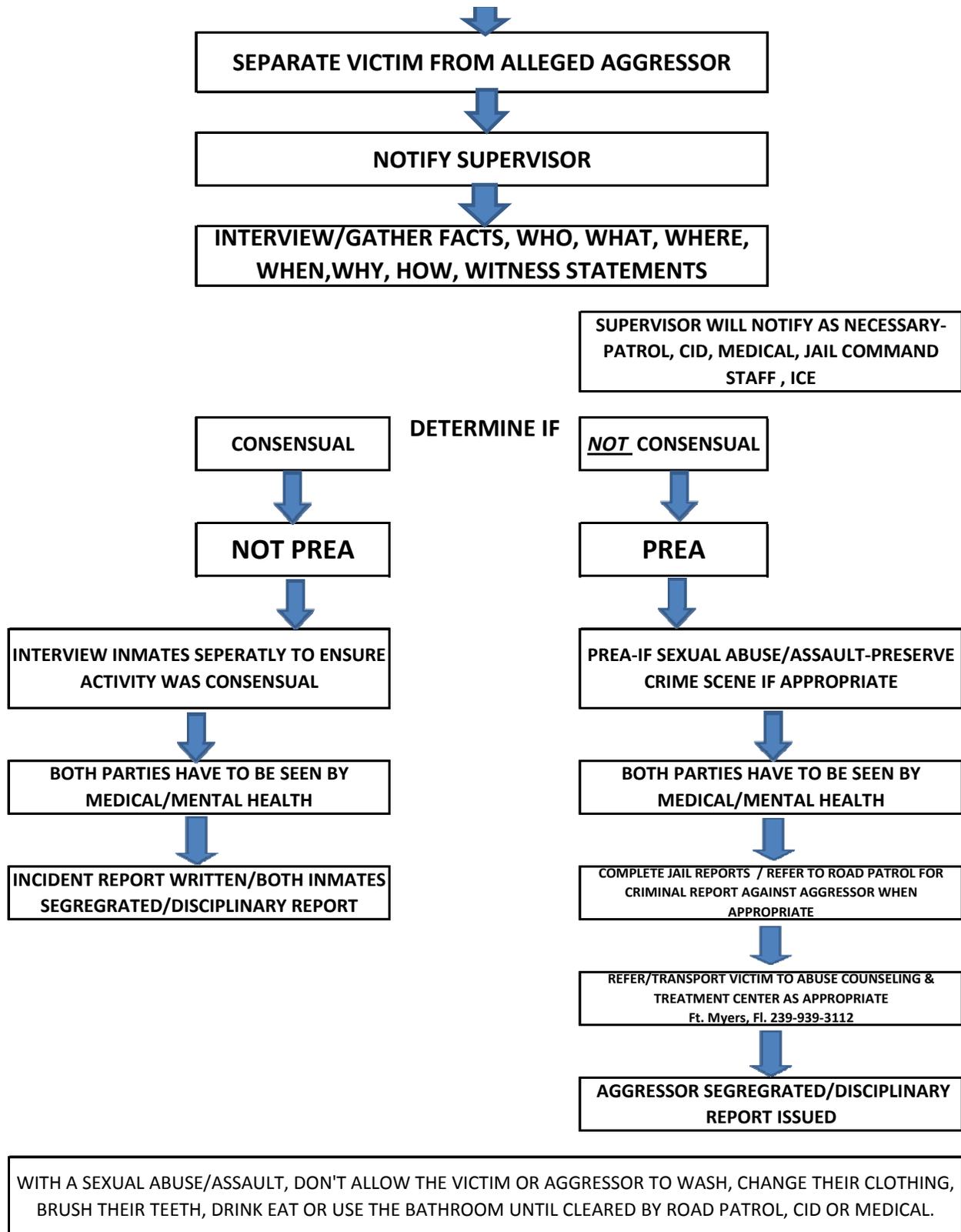
- 6). Medical reports (documentation that inmate was checked by Medical).
- 7). Witness Statement(s).
- 8). Any other relevant documents, photographs, notes, etc.

E. § 115.65 Coordinated Response

1. The facility has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. **(115.65 (a)-1)**

See Allegation of Sexual Response plan below

ALLEGATION OF SEXUAL ACTIVITY



F. § 115.66 Protection of inmates/detainees from contact with alleged abusers

1. Any staff, contractors and volunteers suspected of perpetrating sexual abuse shall be removed from all duties requiring inmate or detainee contact pending the outcome of an investigation.

G. § 115.67 Agency protection against retaliation

1. The agency protects all inmates and staff who report sexual abuse or sexual harassment or those who cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff. The agency's PREA Coordinator (Detention Director of Operations) is designated to monitor for possible retaliation. **(115.67 (a)-1) (115.67 (a)-2)**
2. The agency shall employ multiple protection measures, such as housing changes or transfers or inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.
3. For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of inmates or staff who report sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmate or staff, and acts promptly to remedy any such retaliation. The agency shall monitor to include; any inmate disciplinary reports, housing or program changes or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. **(115.67 (c)-1) (115.67 (c)-2) (115.67 (c)-4)**
4. The agency shall act promptly to address and remedy any report of retaliation identified against inmates or staff. **(115.67 (c)-3)**
5. If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation.
6. The agency's obligation to monitor shall terminate if the agency determined that the allegation is unfounded.

H. § 115.68 Post-allegation protective custody

1. Any use of segregated housing to protect an inmate or detainee who is alleged to have suffered sexual abuse is subject to the requirements of section § 115.43 of this policy. **(115.68 (a)-1)**
2. The facility shall take care to place inmate and detainee victims of sexual abuse in a supportive environments that represents the least restrictive housing option possible.
3. Placement of inmates and/or detainees into involuntary protective custody housing environments, as a result of their alleging to have suffered from sexual abuse, is normally prohibited unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative means of separation from likely abusers. **(115.68 (a)-1)**
 - a. In instances when involuntary segregation is utilized in such a case, inmates will be reviewed every 30 days, or sooner if appropriate, to determine whether there is a continuing need for separation from the general population. **(115.68 (a)-5)**
 - b. ICE Detainee victims will not be held in any type of administrative segregation for more than five days, except in highly unusual circumstances or at the detainee's request.

VII. INVESTIGATIONS

A. § 115.71 Criminal and administrative agency investigations

1. All investigations into allegations of sexual abuse and sexual harassment will be done promptly, thoroughly, and objectively, including third-party and anonymous reports. **(115.71 (a)-1)**
2. The Glades County Sheriff's Office Detention Division shall use investigators who have received special training pursuant to § 115.34.
3. Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.
4. When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.
5. The credibility of an alleged victim, suspect or witness shall not be determined by the person's status as inmate or staff. The agency shall not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.
6. Administrative investigations:
 - a) Shall include an effort to determine whether staff actions or failures to act contributed to the abuse;
 - b) Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.
7. Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial and documentary evidence and attaches copies of all documentary evidence where feasible.
8. All substantial allegations of conduct that appear to be criminal will be referred for prosecution. **(115.71 (h)-1)**
9. The agency retains all written reports pertaining to administrative or criminal investigations of alleged sexual assault or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. **(115.71 (i)-1)**
10. The departure of the alleged abuser or victim from the employment or control of the facility or agency control shall not provide a basis from terminating an investigation.
11. When outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

B. § 115.72 Evidentiary standards for administrative investigations

1. The agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated. **(115.72 (a)-1)**

C. § 115.73 Reporting to inmates

1. The agency requires that any inmate who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. **(115.73 (a)-1)**
2. If there has been a substantiated or unsubstantiated complaint (i.e. not unfounded) of sexual abuse committed by a staff member against an inmate, the agency must subsequently inform the inmate whenever: **(115.73 (c)-1) (115.73 (c)-2)**
 - a) The staff member was no longer posted within the inmate's unit.
 - b) The staff member was no longer employed at the facility.
 - c) The agency learned that the staff member was indicted on a charge related to sexual abuse within the facility.
 - d) The agency learned that the staff member was convicted on a charge related to sexual abuse within the facility.
3. Following an inmate's allegation that he or she has been sexually abused by another inmate in an agency facility, the agency subsequently informs the alleged victim whenever: **(115.73 (d)-1)**
 - a) The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility.
 - b) The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
4. All notifications to inmates described under this standard must be documented. **(115.73 (e)-1)**
5. The agency shall, when the detainee is still in immigration detention, or where otherwise feasible, following an investigation into a detainee's allegation of sexual abuse, notify the detainee as to the result of the investigation and any responsive action taken.

VIII. DISCIPLINE

A. § 115.76 Disciplinary sanctions for staff

1. Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. **(115.76 (a)-1)**
2. Termination is the likely disciplinary sanction for staff who engaged in sexual abuse.
3. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. **(115.76 (c)-1)**

4. All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. **(115.76 (d)-1)**

B. § 115.77 Corrective action for contractors and volunteers

1. The agency requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. **(115.77 (a)-1)**
2. Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates. **(115.77 (a)-2)**
3. The facility will take remedial measures and prohibit further contact with inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. **(115.77 (b)-1)**

C. § 115.78 Disciplinary sanctions for inmates

1. Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse. **(115.78 (a)-1)**
2. Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. **(115.78 (a)-2)**
3. Sanctions are proportionate with the nature and circumstance of the abuses committed, the inmate's disciplinary history, and the sanctions imposed for the comparable offenses by other inmates with similar histories.
4. The disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any should be imposed.
5. The facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for abuse. Offenders or other subjects are not required to participate in such recommended measures in order to have access to other programming or benefits. **(115.78 (d)-1) (115.78 (d)-2)**
6. The agency disciplines inmates for sexual conduct with staff only upon finding that the staff member did not consent to such contact. **(115.78 (e)-1)**
7. The agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. **(115.78 (f)-1)**
8. The Glades County Sheriff's Office Detention Division prohibits all sexual activity between inmates. **(115.78 (g)-1)**
9. Although all sexual activity is prohibited between inmates, the agency will only deem such activity to constitute sexual abuse if it determines that the activity is coerced. **(115.78 (g)-2)**

IX. MEDICAL AND MENTAL HEALTH CARE

A. § 115.81 Medical and mental health screening; history of sexual abuse

1. All inmates at this facility who have disclosed any prior sexual victimization during a screening pursuant to § 115.41 are offered a follow-up meeting within 14 days with a medical or mental health practitioner. **(115.81 (a)/(c)-1) (115.81 (a)/(c)-2)**
 - a) Medical and Mental maintain secondary materials (e.g. form, electronic log) documenting compliance with above standard. **(115.81 (a)/(c)-4)**
2. Information related to sexual victimization or abusiveness that occurred in an institutional setting is not limited to medical and mental health practitioners. The information shared with other staff is strictly limited to informing security and management decisions, including treatment plans, housing, bed, work, education, and program assignments, or as otherwise required by federal, state or local law. **(115.81 (d)-1) (115.81 (d)-2)**
3. Specific to ICE detainees, if the assessment pursuant to § 115.41 indicates that a detainee has experienced prior sexual victimization or perpetrated sexual abuse, staff shall, as appropriate, ensure that the detainee is immediately referred to a qualified medical or mental health practitioner for medical and/or mental health follow-up as appropriate.
 - a) When a referral for medical follow up is initiated, the detainee shall receive a health evaluation no later than two working days from the date of assessment.
 - b) When a referral for mental health follow-up is initiated, the detainee shall receive a mental health evaluation no later than 72 hours after the referral.
4. Medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18. **(115.81 (e)-1)**

B. § 115.82 Access to emergency medical and mental health services

1. Inmate victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. **(115.82 (a)-1)**
2. Inmate victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. **(115.82 (c)-1)**
3. Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. **(115.82 (d)-1)**

C. § 115.83 ongoing medical and mental health care for sexual abuse victims and abusers

1. The facility offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. **(115.83 (a)-1)**
2. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to or placement in, other facilities, or their release from custody.
3. The facility shall provide such victims with medical and mental health services consistent with the community level of care.

4. Female victims of sexual abuse while incarcerated are offered pregnancy tests. **(115.83 (d)-1)**
5. If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about and timely access to, all lawful pregnancy-related medical services. **(115.83 (e)-1)**
6. Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. **(115.83 (f)-1)**
7. Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.
8. The facility will maintain that a mental health evaluation is conducted of all inmate-on-inmate abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.

D. § 115.86 Sexual abuse incident reviews

1. The facility conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including whether the allegation has not been substantiated, unless the allegation has been determined to be unfounded. **(115.86 (a)-1)**
2. Sexual abuse incident reviews will be conducted within 30 days of concluding the investigation. **(115.86 (b)-1)**
2. The sexual abuse incident review team will include upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health staff. **(115.86 (c)-1)**
4. The review team shall:
 - a) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect or respond to sexual abuse.
 - b) Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender or intersex identification status or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility.
 - c) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
 - d) Assess the adequacy of staffing levels in that area during different shifts.
 - e) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.
 - f) Prepares a report of its findings and any recommendations for improvement and submit such report to the facility head and PREA compliance manager. **(115.86 (d)-1)**
5. The facility will implement the recommendations or will document the reason for not doing so. **(115.86 (e)-1)**
6. The facility shall conduct an annual review of all sexual abuse investigations and resulting

incident reviews to assess and improve sexual abuse intervention, prevention and response efforts. If the facility has not had any reports of sexual abuse during the annual reporting period, then the facility shall prepare a negative report. The results and findings of the annual review shall be provided to the facility administrator, ICE Field Office Director and the agency PREA Coordinator.

E. § 115.87 Data collection

1. The agency collects accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. **(115.87 (a)-1)**
2. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. **(115.87 (a)/(c)-2)**
3. The agency aggregates the incident-based data at least annually. **(115.87 (b)-1)**
3. The agency maintains reviews and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. **(115.87 (d)-1)**
5. Upon request, the agency will provide all such data from the previous calendar year to the Department of Justice no later than June 30. **(115.87 (f)-1)**

F. § 115.88 Data review for corrective action

1. The agency reviews data collected and aggregated pursuant to §115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: **(115.88 (a)-1)**
 - a) Identifying problem areas.
 - b) Taking corrective action on an ongoing basis.
 - c) Preparing an annual report of its findings from its data review and any corrective actions.
2. The annual report will include a comparison of the current year's data and corrective actions with those from prior years. **(115.88 (b)-1)**
3. The annual report will provide an assessment of the agency's progress in addressing sexual abuse. **(115.88 (b)-2)**
4. The agency will make its annual report readily available to the public at least annually through its website. **(115.88 (c)-1)**
5. The annual reports are approved by the agency head. **(115.88 (c)-3)**
6. When the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. **(115.88 (d)-1)**
7. The agency will indicate the nature of the redaction. **(115.88 (d)-2)**

G. § 115.89 Data storage, publication, and destruction

1. The agency ensures that the incident-based and aggregate data are securely retained. **(115.89 (a)-1)**
2. Aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website. **(115.89 (b)-1)**
3. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. **(115.89 (c)-1)**
4. The agency maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise. **(115.89 (c)-2)**

H. § 115.93 Audits and Compliance

1. During the first three-year period starting on July 6, 2015, and during each three-year period thereafter, the agency shall ensure that its facility(s) has adopted these standards and is audited at least once.
2. The GCSO shall ensure that the jail facility(s) is audited in accordance with current PREA Standards.


Stuart Whiddon, Sheriff



Florida Council Against Sexual Violence Certified Rape Crisis Centers
<http://www.fcasyv.org/> HOTLINE 1-888-956-RAPE (7273)

Program Name	Location	Hotline #	Counties Served
1. Abuse Counseling & Treatment (ACT)	Fort Myers	239-939-3112	Glades, Hendry, Lee
2. Alachua County Victim Services & Rape Crisis Center	Gainesville	866-252-5439	Alachua, Bradford, Union
3. Another Way	Lake City	866-875-7983	Columbia, Dixie, Gilchrist, Hamilton, Lafayette, Levy, Suwannee
4. Betty Griffin House	St. Augustine	904-824-1555	St. Johns
5. Bridgeway Center	Fort Walton Beach	850-244-9191	Okaloosa
6. Broward County Sexual Assault Treatment Ctr.	Ft. Lauderdale	954-761-7273	Broward
7. Center for Abuse & Rape Emergencies (CARE)	Punta Gorda	941-627-6000	Charlotte
8. Children's Advocacy Center	Daytona Beach	800-940-7273	Flagler, Volusia
9. Creative Services	Ocala	352-622-8495 / 352-622-5919	Marion
10. Crisis Center of Tampa Bay	Tampa	813-234-1234	Hillsborough
11. Dawn Center of Hernando County	Spring Hill	352-799-0657	Hernando
12. Family Service Centers Rape Crisis Program	Clearwater	727-530-RAPE (7273)	Pinellas
13. Haven of Lake & Sumter Counties	Leesburg	352-787-1379	Lake, Sumter
14. Lakeview Center	Pensacola	850-433-7273	Escambia, Santa Rosa
15. Manatee Glens Rape Crisis Services	Bradenton	941-708-6059	Manatee
16. M.U.J.E.R.	Homestead	305-345-0853	Miami-Dade
17. Palm Beach County Victim Services	West Palm Beach	561-833-7273 / 866-891-7273	Palm Beach
18. Peace River Center for Personal Development	Barrow	863-413-2707	Hardee, Highlands, Polk
19. Project HELP	Naples	239-262-7227	Collier
20. Putnam County Health Department	Palatka	800-326-0919	Putnam
21. Quigley House	Orange Park	800-339-5017	Clay
22. Refuge House	Tallahassee	850-681-2111 / 800-500-1119	Franklin, Gadsden, Jefferson, Leon, Liberty, Madison, Taylor, Wakulla
23. Roxy Bolton Rape Treatment Center	Miami	305-585-7273	Miami-Dade
24. Safe Place & Rape Crisis Center (SPARCC)	Sarasota	941-365-1976	Desoto, Sarasota
25. Salvation Army	Panama City	850-763-0706	Bay, Calhoun, Gulf, Holmes, Jackson, Washington
26. Sexual Assault Victim Services (SAVS)	Viera	321-784-HELP (4357)	Brevard, Seminole
27. Sexual Assault Assistance Program, 19 th Circuit	Fort Pierce	866-828-7273	Indian River, Martin, Okeechobee, St. Lucie
28. Sunrise of Pasco County	Dade City	352-521-3120 / 888-668-7273	Pasco
29. Victim Service Center of Orange County	Orlando	407-497-6701	Orange
30. Women's Center of Jacksonville	Jacksonville	904-244-7273	Baker, Duval, Nassau

APPENDIX A