

## Prison Rape Elimination Act (PREA) Audit Report Community Confinement Facilities

Interim       Final

Date of Report    September 21, 2019

### Auditor Information

Name:    Garry Russell	Email:    garry.russell@q.com
Company Name:    Russell & Associates Consulting, LLC	
Mailing Address:    PO Box 4102	City, State, Zip:    Salem, OR 97302
Telephone:    503-559-3564	Date of Facility Visit:    July 24-26, 2019

### Agency Information

Name of Agency:		Governing Authority or Parent Agency (If Applicable):	
Lane County Sheriff's Office		Lane County	
Physical Address:    125 E. 8th Avenue		City, State, Zip:    Eugene, OR 97401	
Mailing Address:    125 E. 8th Avenue		City, State, Zip:    Eugene, OR 97401	
The Agency Is:	<input type="checkbox"/> Military	<input type="checkbox"/> Private for Profit	<input type="checkbox"/> Private not for Profit
<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> County	<input type="checkbox"/> State	<input type="checkbox"/> Federal
Agency Website with PREA Information: <a href="https://www.lanecounty.org/cms/One.aspx?portalId=3585881&amp;pageId=4240653">https://www.lanecounty.org/cms/One.aspx?portalId=3585881&amp;pageId=4240653</a>			

### Agency Chief Executive Officer

Name:    Clifton Harrold	
Email:    Clifton.Harrold@co.lane.or.us	Telephone:    541-682-6790

### Agency-Wide PREA Coordinator

Name:    Steve French	
Email:    Steve.French@co.lane.or.us	Telephone:    541-682-2246
PREA Coordinator Reports to: Captain Clint Riley	Number of Compliance Managers who report to the PREA Coordinator: 2

## Facility Information

<b>Name of Facility:</b> Lane County Community Corrections/Residential Re-entry Center			
<b>Physical Address:</b> 75 West 5th Avenue		<b>City, State, Zip:</b> Eugene, OR 97401	
<b>Mailing Address (if different from above):</b> Click or tap here to enter text.		<b>City, State, Zip:</b> Click or tap here to enter text.	
<b>The Facility Is:</b>	<input type="checkbox"/> Military	<input type="checkbox"/> Private for Profit	<input type="checkbox"/> Private not for Profit
<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> County	<input type="checkbox"/> State	<input type="checkbox"/> Federal
<b>Facility Website with PREA Information:</b> <a href="https://www.lanecounty.org/cms/One.aspx?portalId=3585881&amp;pageId=4240653">https://www.lanecounty.org/cms/One.aspx?portalId=3585881&amp;pageId=4240653</a>			
<b>Has the facility been accredited within the past 3 years?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<b>If the facility has been accredited within the past 3 years, select the accrediting organization(s) – select all that apply (N/A if the facility has not been accredited within the past 3 years):</b>			
<input type="checkbox"/> ACA			
<input type="checkbox"/> NCCHC			
<input type="checkbox"/> CALEA			
<input checked="" type="checkbox"/> Other (please name or describe: Bureau of Prisons Annual Full Monitoring)			
<input type="checkbox"/> N/A			
<b>If the facility has completed any internal or external audits other than those that resulted in accreditation, please describe:</b> N/A			
<b>Facility Director</b>			
<b>Name:</b> Charles Hardy			
<b>Email:</b> Charles.Hardy@co.lane.or.us		<b>Telephone:</b> 541-682-2238	
<b>Facility PREA Compliance Manager</b>			
<b>Name:</b> Charles Hardy			
<b>Email:</b> Charles.Hardy@co.lane.or.us		<b>Telephone:</b> 541-682-2238	
<b>Facility Health Service Administrator</b> <input checked="" type="checkbox"/> N/A			
<b>Name:</b> Click or tap here to enter text.			
<b>Email:</b> Click or tap here to enter text.		<b>Telephone:</b> Click or tap here to enter text.	

Facility Characteristics	
Designated Facility Capacity:	39
Current Population of Facility:	26
Average daily population for the past 12 months:	28
Has the facility been over capacity at any point in the past 12 months?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Which population(s) does the facility hold?	<input type="checkbox"/> Females <input type="checkbox"/> Males <input checked="" type="checkbox"/> Both Females and Males
Age range of population:	18-70
Average length of stay or time under supervision	66.62 Days
Facility security levels/resident custody levels	Minimum
Number of residents admitted to facility during the past 12 months	165
Number of residents admitted to facility during the past 12 months whose length of stay in the facility was for <i>72 hours or more</i> :	165
Number of residents admitted to facility during the past 12 months whose length of stay in the facility was for <i>30 days or more</i> :	165
Does the audited facility hold residents for one or more other agencies (e.g. a State correctional agency, U.S. Marshals Service, Bureau of Prisons, U.S. Immigration and Customs Enforcement)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Select all other agencies for which the audited facility holds residents: Select all that apply (N/A if the audited facility does not hold residents for any other agency or agencies):	<input checked="" type="checkbox"/> Federal Bureau of Prisons <input type="checkbox"/> U.S. Marshals Service <input type="checkbox"/> U.S. Immigration and Customs Enforcement <input type="checkbox"/> Bureau of Indian Affairs <input type="checkbox"/> U.S. Military branch <input checked="" type="checkbox"/> State or Territorial correctional agency <input checked="" type="checkbox"/> County correctional or detention agency <input type="checkbox"/> Judicial district correctional or detention facility <input type="checkbox"/> City or municipal correctional or detention facility (e.g. police lockup or city jail) <input type="checkbox"/> Private corrections or detention provider <input checked="" type="checkbox"/> Other - please name or describe: <b>Federal Pre-Trial</b> <input type="checkbox"/> N/A
Number of staff currently employed by the facility who may have contact with residents:	9
Number of staff hired by the facility during the past 12 months who may have contact with residents:	0

Number of contracts in the past 12 months for services with contractors who may have contact with residents:	1
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	1
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0
<b>Physical Plant</b>	
<p><b>Number of buildings:</b></p> <p>Auditors should count all buildings that are part of the facility, whether residents are formally allowed to enter them or not. In situations where temporary structures have been erected (e.g., tents) the auditor should use their discretion to determine whether to include the structure in the overall count of buildings. As a general rule, if a temporary structure is regularly or routinely used to hold or house residents, or if the temporary structure is used to house or support operational functions for more than a short period of time (e.g., an emergency situation), it should be included in the overall count of buildings.</p>	1
<p><b>Number of resident housing units:</b></p> <p>Enter 0 if the facility does not have discrete housing units. DOJ PREA Working Group FAQ on the definition of a housing unit: How is a "housing unit" defined for the purposes of the PREA Standards? The question has been raised in particular as it relates to facilities that have adjacent or interconnected units. The most common concept of a housing unit is architectural. The generally agreed-upon definition is a space that is enclosed by physical barriers accessed through one or more doors of various types, including commercial-grade swing doors, steel sliding doors, interlocking sally port doors, etc. In addition to the primary entrance and exit, additional doors are often included to meet life safety codes. The unit contains sleeping space, sanitary facilities (including toilets, lavatories, and showers), and a dayroom or leisure space in differing configurations. Many facilities are designed with modules or pods clustered around a control room. This multiple-pod design provides the facility with certain staff efficiencies and economies of scale. At the same time, the design affords the flexibility to separately house residents of differing security levels, or who are grouped by some other operational or service scheme. Generally, the control room is enclosed by security glass, and in some cases, this allows residents to see into neighboring pods. However, observation from one unit to another is usually limited by angled site lines. In some cases, the facility has prevented this entirely by installing one-way glass. Both the architectural design and functional use of these multiple pods indicate that they are managed as distinct housing units.</p>	2 – There is a male and female housing area. Each housing area has multiple occupancy rooms.
Number of single resident cells, rooms, or other enclosures:	0
Number of multiple occupancy cells, rooms, or other enclosures:	8
Number of open bay/dorm housing units:	0
Does the facility have a video monitoring system, electronic surveillance system, or other monitoring technology (e.g. cameras, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has the facility installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology in the past 12 months?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## Medical and Mental Health Services and Forensic Medical Exams

Are medical services provided on-site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are mental health services provided on-site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Where are sexual assault forensic medical exams provided? Select all that apply.	<input type="checkbox"/> On-site <input checked="" type="checkbox"/> Local hospital/clinic <input type="checkbox"/> Rape Crisis Center <input type="checkbox"/> Other (please name or describe: Click or tap here to enter text.)

### Investigations

#### Criminal Investigations

Number of investigators employed by the agency and/or facility who are responsible for conducting CRIMINAL investigations into allegations of sexual abuse or sexual harassment:	5
When the facility received allegations of sexual abuse or sexual harassment (whether staff-on-resident or resident-on-resident), CRIMINAL INVESTIGATIONS are conducted by: Select all that apply.	<input type="checkbox"/> Facility investigators <input checked="" type="checkbox"/> Agency investigators <input checked="" type="checkbox"/> An external investigative entity
Select all external entities responsible for CRIMINAL INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for criminal investigations)	<input checked="" type="checkbox"/> Local police department <input type="checkbox"/> Local sheriff's department <input checked="" type="checkbox"/> State police <input type="checkbox"/> A U.S. Department of Justice component <input type="checkbox"/> Other (please name or describe: Click or tap here to enter text.) <input type="checkbox"/> N/A

#### Administrative Investigations

Number of investigators employed by the agency and/or facility who are responsible for conducting ADMINISTRATIVE investigations into allegations of sexual abuse or sexual harassment?	2
When the facility receives allegations of sexual abuse or sexual harassment (whether staff-on-resident or resident-on-resident), ADMINISTRATIVE INVESTIGATIONS are conducted by: Select all that apply	<input type="checkbox"/> Facility investigators <input checked="" type="checkbox"/> Agency investigators <input type="checkbox"/> An external investigative entity
Select all external entities responsible for ADMINISTRATIVE INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for administrative investigations)	<input type="checkbox"/> Local police department <input type="checkbox"/> Local sheriff's department <input type="checkbox"/> State police <input type="checkbox"/> A U.S. Department of Justice component <input type="checkbox"/> Other (please name or describe: Click or tap here to enter text.) <input checked="" type="checkbox"/> N/A

# Audit Findings

## Audit Narrative

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

Garry Russell, doing business as Russell & Associates Consulting, LLC and Department of Justice certified PREA auditor (#P0474) was the lead auditor to conduct the Prison Rape Elimination Act (PREA) audit for the Lane County Sheriff's Office at the Lane County Adult Corrections facility and the Lane County Residential Re-entry Center.

Communication with Lane County Sheriff's Office began in January 2019, to discuss scheduling a PREA audit for both the Adult Corrections Facility and the Residential Re-entry Center. Lane County returned the signed contract for a PREA audit on March 29, 2019.

The PREA Compliance Manager was emailed the notice on of audit on May 12, 2019 and the first letter from an inmate was post marked May 17, 2019 (more than 6 weeks prior to the onsite visit). The audit notice read as follows:

The Lane County Adult Correctional Facility will be undergoing an audit for compliance with the United States Department of Justice's National Standards to Prevent, Detect, and Respond to Prison Rape under the Prison Rape Elimination Act (PREA) for Jail Facilities July 24-26, 2019.

Any person with information relevant to this compliance may confidentially\* correspond with the auditor prior to the on-site audit activities throughout the issuance of the final report. The auditor may be reached at the following address:

Garry Russell  
Russell & Associates Consulting, LLC  
PO Box 4102  
Salem, OR 97302

\*Confidentiality – All written and verbal correspondence and disclosures provided to the designated auditor are confidential and will not be disclosed unless required by law. There are exceptions when confidentiality must be legally breached. Exceptions include, but are not limited to the following:

- If the person is an immediate danger to her/himself or others (e.g. suicide or homicide);
  - Allegations of suspected child abuse, neglect or maltreatment; or
- In legal proceedings where information has been subpoenaed by a court of appropriate jurisdiction.

While onsite the auditor observed the audit notice posted in various locations throughout the facility in visible locations that staff, clients, and visitors had the opportunity to contact the auditor.

The auditor received the pre-audit questionnaire and supporting documents from the PREA Compliance Manager on June 20, 2019. Additional emails and phone calls were made to the PREA Compliance Manager as they related to follow up questions and additional documentation. The PREA Compliance Manager answered these questions in a timely manner and prepared hard copies of additional

documentation upon arrival for the onsite visit for the auditor. The auditor also reviewed the Lane County Sheriff's Office website, the PREA Audit from their first, which was also their most recent, PREA Audit dated October 11, 2016, and the Annual Report from 2018.

The Lane County Adult Corrections Facility has onsite medical and mental health staff. All sexual assault forensic exams are conducted at Sacred Heart Hospital RiverBend.

The auditor contacted Sexual Assault Support Services (SASS) of Lane County to verify that the agency had a memorandum of understanding (MOU) with a community agency. The Financial Director from SASS returned the auditors call and verified the MOU that has been in place since 2016. They also stated that they have about half of their staff that have been cleared to visit the facility and make visits every couple of months. They also confirmed that they were contacted whenever a victim/survivor was taken to the hospital and they would provide community advocacy throughout the process.

During the tour of the facility the auditor noticed many PREA posters in both English and Spanish. These posters included contact numbers to outside services such as the White Bird Clinic and Sexual Assault Support Services.

On Wednesday, July 24, 2019, the auditor arrived at the Lane County Adult Corrections facility at 0800. The PREA Compliance Manager met the auditor at the front desk and escorted the auditor into the building to where the auditor could set up for staff interviews. An initial meet and greet was held in attendance were the following:

- S. French, PREA Coordinator
- D. McGuire, PREA Compliance Manager
- C. Hardy, Residential Re-entry Center
- G. Russell, Lead Auditor

The auditor went over the staff that would be needed for specialized interviews and the number of staff that would be needed from each shift for random interviews. Additionally, the auditor went over the target client interviews that would be needed and the number of random client interviews from both the male and female housing areas.

Following the meet and greet, the auditor was given a tour of all areas of both facilities. After a tour the Adult Corrections Facility the auditor was taken to the Residential Re-entry Center and was given a tour of that facility that included: all housing areas, laundry, kitchen, and common areas. While touring the auditor paid particular attention to camera placement, lines of sight, privacy for residents in specified areas, PREA reporting/victim advocacy and audit notification posters, staff and resident interactions. The auditor conducted informal discussion with staff while touring and observed PREA reporting/victim advocacy and audit notification posters in visible areas where staff and residents had access.

Following the tour of both the Adult Corrections Facility and the Residential Re-entry Center, the auditor was set up in a contractor's office at the Residential Re-entry Center to conduct staff interviews, resident interviews, and documentation review. Random staff were selected from to ensure equitable representation from all shifts and program/operational areas of the facility. For random interviews, residents were chosen that were currently in the facility and then the auditor would pull residents as they returned to the facility.

The auditor requested to see the agency investigation files that had occurred during the past year. From the investigations, the auditor randomly chose to review three investigations that reflected both Staff on Inmate and Inmate on Inmate allegations. The auditor requested agency staff files and chose random staff to include a new applicant. The files were reviewed for criminal history checks. PREA training and PREA

refresher training were maintained in separate files and they were also reviewed. Three resident files were reviewed for their intake date, PREA education, risk screenings and follow up assessments.

During 2018, agency wide there were 25 total allegations received. There were fourteen sexual harassment allegations with two inmate to inmate allegations being substantiated; one sexual misconduct allegation that was not substantiated and 10 allegations of sexual assault with none being substantiated.

Interviews were conducted as follows:

The total staff interviews conducted: 11 (Only 9 staff work at this facility, some of the specialized staff are from the Adult Corrections Facility)

- Agency Head designee - 1
- Facility Director – 1
- PREA Coordinator/Incident Review Team - 1
- PREA Compliance Manager/Retaliation Monitor/Investigator – 1
- Contractor – 1
- Human Resources – 1
- Staff who Perform Risk Screening Assessment/Intake – 1
- Random Staff – 4

The number of residents housed at the Residential Re-entry Center on the first day of the onsite audit was 26. A total of 10 residents, which represented 38% of the population were interviewed. Due to the composition of this small resident population there were not any residents that met the targeted interview criteria. All 10 interviews conducted at the Residential Re-entry Center were random resident interviews.

The auditor received two letters from inmates housed at the Adult Corrections facility prior to the onsite audit.

Residents confirmed receiving information about the facility's rules against sexual abuse and sexual harassment; their right not to be sexually abused or harassed; and how to report. Residents were aware of the posters that were posted throughout the facility and that they had reporting and advocacy contact information.

Residents interviewed stated that staff of the opposite gender announce their presence when entering their housing area. They also stated that they are not seen by staff of the opposite gender while they are using the toilet, changing clothes, or showering.

This facility has very senior staff that were observed moving around the facility as well as engaging in positive interactions with both staff and residents. The auditor was impressed with their informal engagement with staff members, and the importance that staff gave towards PREA related incidents.

The auditor completed the onsite portion of the audit on July 26, 2019. A short briefing was conducted and attended by the Corrections Division Captain, PREA Coordinator, PREA Compliance Manager, and Residential Re-entry Center Sergeant.

After the onsite portion of the audit, the Auditor utilized the Auditor Compliance Tool for Community Confinement Facilities and the Checklist of Documentation as guides to determine compliance with each standard. The Auditor utilized information from the Pre-Audit Questionnaire, information and practices observed during the onsite audit, documents provided before and during the onsite audit and information obtained from both staff and inmate interviews to complete the audit and determination of compliance. The



Lane County Sheriff's Office General Orders and Post Orders still apply at the Residential Re-entry Center. Due to that the auditor has used inmate and resident interchangeably throughout the report depending on what the source document referred to.

## Facility Characteristics

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

The Residential Re-entry Center is located adjacent to the Adult Corrections Facility and has a capacity for 39 residents. Residents participating in the program learn skills that will assist them in securing employment or attending school. This includes preparing resumes, practicing interview techniques, completing employment and school admission applications. It is the goal of the program to reduce recidivism through assisting participants through addressing criminogenic needs and in transitioning back into the community with both gainful employment and the skills to maintain a clean, sober and productive lifestyle.

The Residential Re-entry Center is a single building that operates on the first floor of the building with 8 multiple occupant housing areas. The second floor of the building is operated by Lane County Parole and Probation. A sergeant oversees the daily operations of the facility. Nine staff and one contractor are work at the Residential Re-entry Center. [REDACTED]

The facility houses both male and female residents who are 18 years old and older. The average length of stay is 66 days.

There are no medical or mental health services onsite. All forensic medical examinations are performed by SAFE/SANE staff at Sacred Heart Medical Center at RiverBend. The agency has agreements with two organizations for advocacy services: the White Bird Clinic and Sexual Assault Support Services. Medical and advocacy services are free of charge to any victim/survivor of sexual assault or abuse.

## Summary of Audit Findings

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

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

### Standards Exceeded

Number of Standards Exceeded: 0  
List of Standards Exceeded: N/A

### Standards Met

Number of Standards Met: 41

### Standards Not Met

Number of Standards Not Met: 0  
List of Standards Not Met: N/A

## AUDITOR CERTIFICATION

I certify that:

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

### Auditor Instructions:

Type your full name in the text box below for Auditor Signature. This will function as your official electronic signature. Auditors must deliver their final report to the PREA Resource Center as a searchable PDF format to ensure accessibility to people with disabilities. Save this report document into a PDF format prior to submission.<sup>1</sup> Auditors are not permitted to submit audit reports that have been scanned.<sup>2</sup> See the PREA Auditor Handbook for a full discussion of audit report formatting requirements.

Garry Russell

September 21, 2019

**Auditor Signature**

**Date**

<sup>1</sup> See additional instructions here: <https://support.office.com/en-us/article/Save-or-convert-to-PDF-d85416c5-7d77-4fd6-a216-6f4bf7c7c110>.

<sup>2</sup> See *PREA Auditor Handbook*, Version 1.0, August 2017; Pages 68-69.

**To request and schedule a viewing of the full PREA Audit Report please contact:**

**PREA Coordinator - Lt. Steve French**

**541-682-2246**