



ALTON POLICE DEPARTMENT
ALTON, ILLINOIS
POLICY AND PROCEDURES



PREA-1
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**Prison Rape Elimination Act
PREA DOJ § 115**

1. PURPOSE

The Alton Police Department is committed to zero tolerance of any form of sexual abuse and sexual harassment in the Jail directly or with other agencies which it holds contracts for the confinement of inmates.

2. ZERO TOLERANCE POLICY - DOJ § 115.11(a)

The Alton Police Department mandates zero tolerance toward all forms of sexual abuse and sexual harassment. Sexual abuse of an inmate and sexual harassment of an inmate are prohibited.

A. Definitions

- (1) "Inmate" means any person incarcerated or detained in the jail.
- (2) "Staff" means an agency employee.
- (3) "Contractor" means a person who provides services on a recurring basis pursuant to a contractual agreement with the agency.
- (4) "Volunteer" means an individual who donates time and effort on a recurring basis to enhance the activities and programs of the agency.
- (5) "Consent" refers to cooperation in act or attitude pursuant to an exercise of free will and with full understanding of the nature of the act. Inmates cannot consent to sexual contact with staff members, volunteers or contractors.

B. Sexual Abuse

(1) “Sexual abuse” includes:

(a) Sexual abuse of an inmate by another inmate; and

(b) Sexual abuse of an inmate by a staff member, contractor, or volunteer.

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

(a) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight.

(b) Contact between the mouth and the penis, vulva, or anus.

(c) Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument; and

(d) Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or the buttocks of another person, excluding contact incidental to a physical altercation.

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

(a) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight.

(b) Contact between the mouth and the penis, vulva, or anus.

(c) 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.

(d) No staff member shall conduct a search of a transgender or intersex inmate solely for the purpose of determining genital status. If the inmate’s genital status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

(e) 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.

(f) 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 official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.

(g) Any attempt, threat, or request by a staff member, contractor, or volunteer to engage in the activities described in paragraphs (a) through (e) of this section.

(h) Any display by a staff member, contractor, or volunteer of his or her uncovered genitalia, buttocks, or breast in the presence of an inmate.

(i) Voyeurism by a staff member, contractor, or volunteer. Voyeurism by a staff member, contractor, or volunteer means an invasion of privacy of an inmate by staff for reasons unrelated to official duties, such as peering at an inmate who is using a toilet in his or her cell to perform 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.

C. Sexual Harassment

(1) "Sexual harassment" includes:

(a) Sexual harassment of an inmate by another inmate; and

(b) Sexual harassment of an inmate by a staff member, contractor, or volunteer.

(2) Sexual harassment of an inmate by another inmate includes:

Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by an inmate directed toward another.

(3) Sexual harassment of an inmate by a staff member, contractor, or volunteer includes:

Repeated verbal comments or gestures of a sexual nature to an inmate 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.

3. PREA COORDINATOR - DOJ § 115.11(b)

The Alton Police Department shall designate a PREA Coordinator with sufficient time and authority to develop, implement, and oversee its efforts to comply with the PREA standards. The PREA Coordinator shall be a sworn employee given direct written authority, designated by the Police Chief. The PREA Coordinator shall have the following:

- (1) Autonomy outside the restrictions of the regular chain of command;
- (2) Access to Department leadership on a regular basis;
- (3) Informed staff fully aware of the authority of the position;
- (4) The influence necessary to create and implement agency-wide policies, procedures, and practices, without any interference from other levels of bureaucracy or supervision, and in accordance with the PREA standards and interpretative guidance issued by DOJ.
- (5) Decision-making authority.

4. PREVENTING AND DETECTING SEXUAL ABUSE AND HARASSMENT - DOJ § 115.11

The Alton Police Department shall adopt and implement the following measures to prevent and detect sexual abuse and sexual harassment in its facility:

A. Staffing Plan/Video Monitoring - DOJ §115.13

- (1) In the process of creating and revising a staffing plan to provide for adequate levels of staffing and video monitoring to protect inmates against sexual abuse, the Alton Police Department shall ensure that the following factors are taken into consideration:
 - (a) Generally accepted detention and correctional practices;
 - (b) Any judicial findings of inadequacy;
 - (c) Any findings of inadequacy from Federal investigative agencies;
 - (d) Any findings of inadequacy from internal or external oversight bodies;
 - (e) All components of the facility's physical plan;
 - (f) The composition of the inmate population;

- (g) The number and placement of supervisory staff;
- (h) Programs occurring on a particular shift;
- (i) Any applicable State or local laws, regulations, or standards;
- (j) The prevalence of substantiated and unsubstantiated incidents of sexual abuse;
and
- (k) Any other relevant factors.

(2) The Alton Police Department shall make its best efforts to comply with the staffing and video monitoring plan and, in circumstances where compliance is not full, shall document and justify all deviations.

(3) At least once every year, and in collaboration with the PREA Coordinator, the Alton Police Department shall conduct an assessment to determine whether adjustments are needed to the staffing plan and the deployment of video monitoring systems and other technologies.

B. Unannounced Rounds - DOJ §115.13(d)

(1) Supervisors shall conduct and document unannounced rounds covering all shifts, and all areas of the facility, to identify and deter staff sexual abuse or harassment. The Alton Police Department policy prohibits staff members who are aware of these rounds from alerting other staff as to when or where these rounds are occurring, unless related to the legitimate operational needs of the facility.

(2) The PREA Coordinator shall determine how and when the unannounced rounds will be conducted and shall review all documentation from the rounds.

(3) Unannounced rounds will be conducted at least once per every 12 hours shift. Supervisors will document their unannounced rounds on the supervisor jail check log.

C. Youthful Inmates - DOJ §115.14

The Alton Police Department does not house Youthful Offenders. This section is included for reference only.

(1) A youthful inmate (defined as any person under the age of 18 who is under adult court supervision and incarcerated or detained in jail) shall not be placed in a housing unit in which they will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters.

(2) In areas outside of housing units, the Alton Police Department shall either:

(a) Maintain sight and sound separation between youthful inmates and adult inmates, or

(b) Provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact.

(3) The facility shall make best efforts to avoid placing youthful inmates in isolation to comply with this provision. Absent exigent circumstances, the agency shall not deny youthful inmates daily large-muscle exercise and any legally required special education services to comply with this provision. Youthful inmates shall also have access to other programs and work opportunities to the extent possible.

D. Cross Gender Viewing and Searches/Searches of Transgender Inmates - DOJ §115.15

(1) Searches

(a) The facility shall not conduct cross-gender strip searches (meaning a search that requires a person to remove or arrange clothing so as to permit a visual inspection of their breasts, buttocks, or genitalia) or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.

(b) The facility shall not permit cross-gender pat-down searches (a running of the hands over the clothed body of an inmate by an employee to determine whether the individual possesses contraband) of female inmates, absent exigent circumstances. The facility shall not restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.

(c) The facility shall document all cross-gender strip searches and body cavity searches of inmates.

(2) Viewing -DOJ §115.15 (d)

(a) The facility shall enable inmates to shower, perform bodily functions, and change clothing without nonmedical 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.

E. Inmates with Disabilities or Who Have Limited English Proficiency

(1) Disabled Inmates - DOJ § 115.16 (a)

(a) The Alton Police Department shall take appropriate steps to ensure that inmates with disabilities have an equal opportunity to benefit from all aspects of the Alton Police Department efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include – when necessary to ensure effective communication with inmates who are deaf or hard of hearing – providing access to interpreters who can interpret effectively, accurately, and impartially.

(b) In addition, the Alton Police Department shall ensure that written materials are provided in formats and through methods that ensure effective communication with inmates with disabilities.

(2) Inmates Who Have Limited English Proficiency - DOJ § 115.16(b)

The Alton Police Department shall take reasonable steps to ensure meaningful access to all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who have limited English proficiency, including by providing interpreters who can interpret effectively, accurately, and impartially.

(3) Use of Inmate Interpreters - DOJ § 115.16(c)

The Alton Police Department shall not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise an inmate's safety, the performance of first-responder duties, or the investigation of an inmate's allegations.

F. Screening of Inmates

(1) Screening for Risk of Victimization and Abusiveness - DOJ §115.41

(a) All inmates shall be assessed during an intake screening and upon transfer from another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.

(b) Intake screening shall ordinarily take place within 72 hours of arrival at the facility.

(c) Such assessments shall be conducted using an objective screening instrument.

(d) The intake screening shall consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization:

(d1) Whether the inmate has a mental, physical, or developmental disability;

(d2) The age of the inmate;

(d3) The physical build of the inmate;

(d4) Whether the inmate has previously been incarcerated;

(d5) Whether the inmate's criminal history is exclusively nonviolent;

(d6) Whether the inmate has prior convictions for sex offenses against an adult or child;

(d7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;

(d8) Whether the inmate has previously experienced sexual victimization;

(d9) The inmate's perception of his or her own vulnerability to sexual abuse or sexual harassment; and

(d10) Whether the inmate is detained solely for civil immigration purposes.

(e) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the Alton Police Department, in assessing inmates for risk of being sexually abusive.

(f) Within a set time period, 30 days, the facility shall reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

(g) An inmate's risk level shall be reassessed 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.

(h) Inmates may not be disciplined for refusing to answer, or for not disclosing complete information related to, (d1), (d7), (d8) and (d9) above.

(i) The Alton Police Department shall implement appropriate controls on the dissemination of responses to questions asked pursuant to this policy in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates.

(2) Use of Information Obtained from Screening - DOJ §115.42

(a) The Alton Police Department shall use information from the risk screening to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

(b) The Alton Police Department shall make individualized determinations about how to ensure the safety of each inmate.

(c) In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.

(d) Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety experienced by the inmate.

(e) A transgender or intersex inmate's own views with respect to his or her own safety shall be given serious consideration.

(f) Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.

(g) The Alton Police Department shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status unless pursuant to a legal settlement or judgment.

(3) Medical and Mental Health Screenings - DOJ Standards § 115.81

(a) If the screening required in Section 4. F(1) above indicates that an inmate has experienced prior sexual victimization, whether in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

(b) Any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments.

(c) Medical and mental health practitioners shall 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.

G. Protection of Inmates Facing Substantial Risk

(1) Upon Learning of Substantial Risk - DOJ §115.62

When the Alton Police Department learns that an inmate is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the inmate.

(2) Emergency Grievances - DOJ §115.52 (f)

(a) The Alton Police Department shall establish procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse.

(b) After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, the Alton Police Department shall:

(b1) Immediately forward the grievance (or any portion of it that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken;

(b2) Provide an initial response within 48 hours; and

(b3) Issue a final decision within five (5) calendar days.

(c) The initial response and final decision shall document The Alton Police Department determination of whether the inmate is at substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

(3) Protective Custody - DOJ §115.43

(a) Inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless the Alton Police Department has assessed all available alternatives and has determined that there is no available alternative means of separation from likely abusers.

(b) If the facility cannot conduct such an assessment immediately, the facility may hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment. Inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the fullest extent possible.

(c) If the facility restricts access to programs, privileges, education, or work opportunities, it shall document:

(c1) The opportunities that have been limited;

(c2) The duration of the limitation; and

(c3) The reasons for such limitations.

(d) The facility shall assign such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged. Such an assignment shall not ordinarily exceed a period of 30 days.

(e) If an involuntary segregated housing assignment is made pursuant to this section, the facility shall clearly document:

(e1) The basis for the facility's concern for the inmate's safety; and

(e2) The reason why no alternative means of separation can be arranged.

(f) Every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population.

H. Hiring and Promotion Practices - DOJ §115.17

(1) The Alton Police Department shall not hire or promote anyone who may have contact with inmates, or retain the services of any contractor who may have contact with inmates, who:

(a) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; or

(b) Has been convicted of, or civilly or administratively adjudicated for, engaging or attempting to engage in sexual activity in the community facilitated by force, threats of force, or coercion, or if the victim did not consent or was unable to consent.

(2) The Alton Police Department shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to retain the services of any contractor, who may have contact with inmates.

(3) Before hiring new employees who may have contact with inmates, the Alton Police Department shall:

(a) Perform a criminal background records check; and

(b) Make 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) The Alton Police Department shall also perform a criminal background records check before retaining the services of any contractor who may have contact with inmates.

(5) The Alton Police Department shall either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates, or have in place a system for otherwise capturing such information for current employees.

(6) The Alton Police Department shall ask all applicants and employees who may have direct contact with inmates about previous misconduct described in this section, in:

(a) Written applications and/or interviews for hiring or promotion; and

(b) Interviews or written self-evaluations conducted as part of reviews of current employees.

(7) The Alton Police Department shall impose on its current employees a continuing affirmative duty to disclose any of the misconduct described in this section.

(8) Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

(9) Unless prohibited by law, The Alton Police Department 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.

5. RESPONDING TO REPORTS OF SEXUAL ABUSE AND SEXUAL HARASSMENT

To respond to reported incidents of sexual abuse, we have adopted and implemented the following processes:

A. Procedures for Reporting Sexual Abuse and Sexual Harassment

(1) Inmate Reporting

(a) Ways for Inmates to Report Incidents - DOJ §115.51 (a), (b), (c)

(a1) The Alton Police Department shall provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse or sexual harassment, and staff neglect that may have contributed to such incidents. Inmates may report concerns by:

- i. Verbally
- ii. In writing
- iii. Anonymously through a third party
- iv. By dialing #8 on the SECURUS Inmate phone system.

(a2) The Alton Police Department shall also provide at least one way for inmates to report abuse, harassment, retaliation, and staff neglect to a public or private entity that is not part of The Alton Police Department, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Inmates may report concerns by: Call for Help Crisis Intervention Hotline 618-397-0975.

(a3) Staff shall accept reports made verbally, in writing, and anonymously. Staff shall promptly document any verbal reports.

(b) Inmate Grievances - DOJ § 115.52 (a), (b), (c), (e) and (g)

(b1) The Alton Police Department shall not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.

(b2) The Alton Police Department shall not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

(b3) The Alton Police Department shall ensure that:

i. An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and

ii. Such grievance is not referred to a staff member who is the subject of the complaint.

(b4) The Alton Police Department shall issue a final decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. Computation of the 90-day time period shall not include time consumed by inmates in preparing any administrative appeal.

(b5) The Alton Police Department may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The Alton Police Department shall notify the inmate in writing of any such extension and provide a date by which a decision shall be made.

(b6) At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level.

(b7) The Alton Police Department 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.

(2) Staff Reporting Rules - DOJ §115.51(d) and §115.61

(a) Any staff member who has knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment; retaliation against inmates or staff who reported such an incident; and any staff neglect that may have contributed to such incident or retaliation, shall immediately report such incident or retaliation, in the manner specified by the Alton Police Department policy.

(b) Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone except as specified by the Alton Police Department policy.

(c) The Alton Police Department shall provide a method for staff to privately report sexual abuse and sexual harassment of inmates - DOJ §115.51 (d)

(3) Rules for Third Parties to Report Abuse and to Assist Inmates with Grievances - DOJ §115.51(c), §115.52 (e), and § 115.54

(a) The Alton Police Department shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate.

(c) Staff shall accept reports made verbally, in writing, and anonymously from third parties and shall promptly document any verbal reports.

(d) Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of inmates.

(e) If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process. If the inmate declines to have the request processed on his or her behalf, the Alton Police Department shall document the inmate's decision.

B. Coordinated Response - DOJ § 115.65

The facility shall develop a written 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.

C. Immediate Steps After Receiving Report of Incident - DOJ §115.64 an §115.82(b)

(1) When a security staff first-responder learns that an inmate has been sexually abused, they shall take immediate action to protect the inmate. This includes:

(a) Separate the inmate from the alleged perpetrator;

(b) Preserve and protect any crime scene until appropriate steps can be taken to collect 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 will have access to the scene. It is always an advantage to rope off too much than not enough, because you can always reduce the scene but it is hard to expand it once the scene has been contaminated.

- (c) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim—and ensure that the alleged abuser—not take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and
 - (d) If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall immediately notify the appropriate medical and mental health practitioners.
- (2) When the first staff responder is not a security staff member, they shall request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

D. Medical and Mental Health Services

(1) Emergency - DOJ §115.82

- (a) Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.
- (b) 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.
- (c) Treatment services shall be provided to the victim—without financial cost to the victim—and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

(2) Ongoing Medical and Mental Health Care - DOJ §115.83

- (a) The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been sexually abused in a prison, jail, lockup, community corrections facility, or juvenile justice facility.

- (b) The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.
- (c) The facility shall provide such victims with medical and mental health services consistent with the community level of care.
- (d) Inmate victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests, as medically necessary.
- (e) If pregnancy results from the conduct described in this section, victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services, such as prenatal care and access to pregnancy termination services, where available.
- (f) Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections, as medically appropriate.
- (g) Ongoing treatment services shall be provided to the victim without financial cost to the victim and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

E. Support Services for Victims of Sexual Abuse

(1) Victim Advocate - DOJ § 115.21(d)(e) and (h)

- (a) The Alton Police Department shall attempt to make available to the victim an advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocacy services, the Alton Police Department shall make available a qualified staff member from a community-based organization, or a qualified agency staff member to provide these services.
- (b) When requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany the victim throughout the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

(2) Emotional Support Services - DOJ § 115.53

- (a) The facility shall provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers, where available, of local, State, or national victim advocacy or rape crisis organizations, and for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable

communication between inmates and these organizations and agencies, in as confidential a manner as possible.

- (b) The facility shall inform inmates, prior to giving them access to outside advocates, of the extent to which such communications shall be monitored and the extent to which reports of abuse shall be forwarded to authorities in accordance with mandatory reporting laws.
- (c) The Alton Police Department shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.

F. Investigation of Incidents - DOJ §§ 115.21(a)(b)(c)(f) and(h), 115.22, 115.71, 115.72, 115.73 and 115.86

- (1) The Alton Police Department shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.
- (2) It is The Alton Police Department policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The Alton Police Department shall publish this policy on its website at www.cityofaltonil.com and make the policy available through other means. The Alton Police Department shall document all such referrals.
- (3) When the Alton Police Department conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.
- (4) Where sexual abuse is alleged, the Alton Police Department shall use investigators who have received special training in sexual abuse investigations pursuant to Section 6. A. (Employee Training) of this policy.
- (5) Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.
- (6) When the quality of evidence appears to support criminal prosecution, the Alton Police Department shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.
- (7) The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. The

Alton Police Department 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 an investigation.

(8) Administrative investigations:

(a) Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and

(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.

(c) Shall be referred for prosecution if there are substantiated allegations of conduct that appear to be criminal.

(d) The Alton Police Department shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated in administrative investigations.

(9) 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; and

(10) The Alton Police Department shall retain all written reports required by this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

(11) The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.

(12) When other agencies investigate sexual abuse, the Alton Police Department cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

(13) Evidence Protocol and Forensic Medical Exams [DOJ §115.21]

(a) To the extent the Alton Police Department is responsible for investigating allegations of sexual abuse; it shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

(b) The Alton Police Department shall offer all victims of sexual abuse access to forensic medical examinations, without financial cost to the victim, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs), where possible. If

SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The Alton Police Department shall document its efforts to provide SAFEs or SANEs for this purpose.

(c) To the extent the Alton Police Department is not responsible for investigating allegations of sexual abuse; it shall request that the investigating agency follow the requirements of this section.

(14) Following an investigation into an inmate's allegation that he or she suffered sexual abuse, the Alton Police Department shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

(15) If the Alton Police Department did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the inmate.

(16) Following an inmate's allegation that a staff member committed sexual abuse against him or her, the Alton Police Department shall subsequently inform the inmate whenever:

(a) The staff member is no longer posted within the inmate's unit;

(b) The staff member is no longer employed at the facility;

(c) The Alton Police Department learns that the staff member has been charged with or indicted on a charge related to sexual abuse within the facility; or

(d) The Alton Police Department learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

(17) Following an inmate's allegation that he or she has been sexually abused by another inmate, the Alton Police Department shall subsequently inform the alleged victim whenever:

(a) The Alton Police Department learns that the alleged abuser has been charged with or indicted on a charge related to sexual abuse within the facility; or

(b) The Alton Police Department learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

All such notifications or attempted notifications shall be documented. The Alton Police Department obligation to report under this standard shall terminate if the inmate is released from the agency's custody. [DOJ § 115.73]

(18) Sexual abuse incident reviews [DOJ § 115.86]

(a) The Alton Police Department shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded.

(b) The review shall ordinarily occur within 30 days of the conclusion of the investigation.

(c) The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

(d) The review team shall:

(d1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;

(d2) 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;

(d3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;

(d4) Assess the adequacy of staffing levels in that area during different shifts;

(d5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and

(d6) Prepare a report of its findings, including determinations made pursuant to this section, and any recommendations for improvement and submit the report to the facility head and the PREA Coordinator.

(e) The Alton Police Department shall implement the review team's recommendations for improvement, or document its reasons for not doing so.

G. Protection from Retaliation [DOJ §115.67]

(1) The Alton Police Department policy is to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff.

(2) The Alton Police Department shall employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers

from contact with victims, and emotional support services for inmates or staff who 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 Alton Police Department shall monitor the conduct and treatment of inmates or staff who reported 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 inmates or staff, and shall act promptly to remedy any such retaliation.

The Alton Police Department shall continue such monitoring beyond 90 days if the initial monitoring indicates an ongoing need. Monitoring shall include:

- (a) Periodic in-person conversations with inmates and/or staff;
- (b) Review of disciplinary incidents involving inmates;
- (c) Review of housing or program changes; and
- (d) Review of negative performance reviews or reassignments of staff.

(4) Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse shall be subject to the same requirements that are discussed above in Section 4.G(3) (Protective Custody).

H. Sanctions for Individuals Found to have Participated in Sexual Abuse or Harassment

(1) Disciplinary Sanctions for Staff [DOJ Standards §115.76]

- (a) Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.
- (b) Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.
- (c) Disciplinary sanctions for violations of the Alton Police Department policies relating to sexual abuse or sexual harassment shall be 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.
- (d) 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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

(2) Corrective Action for Contractors and Volunteers [§115.77]

(a) Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

(b) The facility shall take appropriate remedial measures, and shall consider whether to prohibit further contact with inmates, in the case of any other violation of the Alton Police Department sexual abuse or sexual harassment policies by a contractor or volunteer.

(3) Disciplinary Sanctions for Inmates [DOJ Standards §115.78]

(a) Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

(b) Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

(c) The disciplinary process shall consider whether an inmate's mental disability or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

(d) If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

(e) The Alton Police Department may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

(f) For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident, even if an investigation does not establish evidence sufficient to substantiate the allegation.

I. Notifying Other Confinement Agencies [DOJ § 115.63]

(1) Upon the Alton Police Department receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the Alton Police Department shall notify the head of the facility or agency where the alleged abuse occurred.

(2) Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.

(3) The Alton Police Department shall document that it has provided such notification.

6. TRAINING AND EDUCATION

The Alton Police Department is committed to communicating to the inmates at its jail, to its employees, and to contractors and volunteers, the following information through the training, education and orientation programs described in this section:

- (1) The Alton Police Department zero tolerance policy;
- (3) The Alton Police Department policies to prevent, detect, and respond to sexual abuse and sexual harassment; and
- (4) Other rights and obligations under this policy.

A. Employee Training [DOJ §115.31]

(1) The Alton Police Department shall train all employees who may have contact with inmates on:

- (a) Its zero-tolerance policy for sexual abuse, sexual harassment and retaliation;
- (b) How to fulfill their responsibilities regarding prevention, detection, reporting, and response to sexual abuse and sexual harassment;
- (c) Inmates' right 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) Security staff employees shall be trained in how to conduct cross-gender pat-down searches, and how to conduct searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

(3) Training shall be tailored to the gender of the inmates at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa.

(4) All current employees shall receive this training, and the Alton Police Department shall provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, the Alton Police Department shall provide refresher information on current sexual abuse and sexual harassment policies.

(5) All employees 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

(6) Specialized Training: Investigators [DOJ §115.34]

(a) In addition to the general training provided to all employees, the Alton Police Department shall ensure that, to the extent it conducts sexual abuse investigations; its investigators have received training in conducting such investigations in confinement settings.

(b) Specialized training shall include techniques for interviewing sexual abuse victims, proper use of *Miranda* and *Garrity* warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

(7) Specialized Training: Medical and Mental Health Professionals [DOJ § 115.35]
the Alton Police Department shall ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facility have been trained in:

- (a) How to detect and assess signs of sexual abuse and sexual harassment;
- (b) How to preserve physical evidence of sexual abuse;
- (c) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and
- (d) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

If medical staff employed by the Alton Police Department conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations.

(8) The Alton Police Department shall document, through employee signature or electronic verification, that employees have received and understand the training. In the case of investigators who investigate sexual abuse in the facility, it shall maintain documentation they have completed the required specialized training in sexual abuse investigations. In the case of medical and mental health practitioners, it shall maintain documentation that they have received the specialized training described in this section.

B. Inmate Orientation and Education [DOJ §115.33]

(1) During the intake process, inmates shall receive information explaining the Alton Police Department zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

(2) Within 72 hours of intake, the Alton Police Department shall provide comprehensive education to inmates 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 the Alton Police Department policies and procedures for responding to such incidents.

(3) Current inmates shall be educated and receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility.

(4) The Alton Police Department shall provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills.

(5) The Alton Police Department shall maintain documentation of inmate participation in these education sessions.

(6) In addition to providing such education, the Alton Police Department shall ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.

C. Volunteer and Contractor Training [DOJ § 115.32]

(1) The Alton Police Department shall ensure that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the Alton Police Department sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

(2) The level and type of training provided to volunteers and contractors shall be based on the services they provide and the level of contact they have with inmates, but all volunteers and contractors who have contact with inmates shall be notified of The Alton Police Department's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report such incidents.

(3) The Alton Police Department shall maintain documentation confirming that volunteers and contractors understand the training they have received.

VII. Data Collection and Review [DOJ §§ 115.87- 89]

A. Data Collection [DOJ § 115.87]

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

(2) The Alton Police Department shall aggregate the incident-based sexual abuse data at least annually.

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

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

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

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

B. Data Review for Corrective Action [DOJ § 115.88]

(1) The Alton Police Department shall review data collected and aggregated pursuant to Section 7. A. (Data Collection) above in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by:

(a) Identifying problem areas;

(b) Taking corrective action on an ongoing basis; and

(c) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.

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

(3) The Alton Police Department report shall be approved by the Alton Police Department head and made readily available to the public through its website or, if it does not have one, through other means.

(4) The Alton Police Department may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but shall indicate the nature of the material redacted.

C. Data Storage, Publication, and Destruction [DOJ § 115.89]

(1) The Alton Police Department shall ensure that data collected pursuant to Section 7. A. are securely retained.

(2) The Alton Police Department shall make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means.

(3) Before making aggregated sexual abuse data publicly available, the Alton Police Department shall remove all personal identifiers.

(4) The Alton Police Department shall maintain sexual abuse data collected pursuant to Section 7. A. for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

VIII. Collective Bargaining Agreements [DOJ § 115.66]

A. The Alton Police Department or any governmental entity responsible for collective bargaining on the Alton Police Department behalf shall not enter into or renew any collective bargaining agreement or other agreement that limits the Alton Police Department ability to remove alleged

staff sexual abusers from contact with any inmates pending the outcome of an investigation or a determination of whether and to what extent discipline is warranted.

B. Nothing in this section shall restrict the Alton Police Department entering into or renewing agreements that govern:

(1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions in this policy relating to the standard of evidence for substantiating allegations of sexual abuse/harassment in Section 5. F. (Investigation of Incidents) and disciplinary sanctions for staff in Section V.H. (Sanctions Against Abusers When Allegations are Substantiated); or

(2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated.

IX. Auditing and Corrective Action [DOJ § 115.401-405]

A. Frequency and Scope of Audits [DOJ § 115.401]

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

(2) During each one-year period starting on August 20, 2013, the Alton Police Department shall ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, is audited.

(3) The Alton Police Department shall bear the burden of demonstrating compliance with the standards.

(4) The Alton Police Department shall permit the auditor to:

(a) Review all relevant agency-wide policies, procedures, reports, internal and external audits, and accreditations for each facility;

(b) Request and receive copies of any relevant documents (including electronically stored information).

(c) Conduct private interviews with inmates.

(5) The Alton Police Department shall make available to the auditor, at a minimum:

(a) A sampling of relevant documents and other records and information for the most recent one-year period;

(b) A sampling of any available videotapes and other electronically available data that may be relevant to the provisions being audited.

(6) The Alton Police Department shall ensure the auditor has access to all areas of the audited facilities.

(7) The Alton Police Department shall cooperate with the auditor to ensure a representative sample of inmates and of staff, supervisors, and administrators can be interviewed by the auditor.

(8) The Alton Police Department shall ensure at least one way for inmates to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

B. Auditor Qualifications [DOJ § 115.402]

(1) The Alton Police Department shall ensure that audits are conducted by a qualified auditor, which includes:

(a) A member of a correctional monitoring body that is not part of, or under the authority of, the Alton Police Department;

(b) A member of an auditing entity such as an inspector general's or ombudsperson's office that is external to the agency; or

(c) Other outside individuals with relevant experience.

(2) All auditors shall be certified by the Department of Justice.

(3) No audit shall be conducted by an auditor who has received financial compensation from the Alton Police Department, except for compensation received for conducting prior PREA audits, within the three years prior to the agency's retention of the auditor.

(4) The Alton Police Department shall not employ, contract with, or otherwise financially compensate the auditor for three years subsequent to the Alton Police Department retention of the auditor, with the exception of contracting for subsequent PREA audits.

C. Audit Contents and Findings [DOJ § 115.403]

(1) Each audit shall include a certification by the auditor that no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.

(2) Audit reports shall state whether agency-wide policies and procedures comply with relevant PREA standards.

(3) For each PREA standard, the auditor shall determine whether the audited facility reaches one of the following findings:

(a) Exceeds Standard (substantially exceeds requirement of standard);

(b) Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period);

(c) Does Not Meet Standard (requires corrective action)

(4) The audit summary shall indicate, among other things, the number of provisions the facility has achieved at each grade level.

(5) Audit reports shall describe the methodology, sampling sizes, and basis for the auditor's conclusions with regard to each standard provision for each audited facility, and shall include recommendations for any required corrective action.

(6) The Alton Police Department shall ensure that the auditor's final report is published on the Alton Police Department website, or is otherwise made readily available to the public.

D. Audit Corrective Action Plan [DOJ § 115.404]

(1) A finding of "Does Not Meet Standard" with one or more standards shall trigger a 180-day corrective action period.

(2) The auditor and the Alton Police Department shall jointly develop a corrective action plan to achieve compliance.

(3) The auditor shall take necessary and appropriate steps to verify implementation of the corrective action plan, such as reviewing updated policies and procedures or re-inspecting portions of a facility.

(4) After the 180-day corrective action period ends, the auditor shall issue a final determination as to whether the facility has achieved compliance with those standards requiring corrective action.

(5) If the Alton Police Department does not achieve compliance with each standard, it may request a subsequent audit once it believes that it has achieved compliance.

E. Audit Appeals [DOJ § 115.405]

(1) The Alton Police Department may lodge an appeal with the Department of Justice regarding any specific audit finding that it believes to be incorrect.

(a) Such appeal must be lodged within 90 days of the auditor's final determination.

(2) If the Department determines that the Alton Police Department has stated good cause for a re-evaluation, the Alton Police Department may commission a re-audit by an auditor mutually agreed upon by the Department and the agency.

(a) The Alton Police Department shall bear the costs of this re-audit.

(3) The findings of the re-audit shall be considered final.

Per Orders:

A handwritten signature in black ink that reads "Chief Jason A. Simmons" with a star symbol and the number "9306" written to the right. Below the signature, the text "Chief Jason Simmons" is printed in a smaller font.

Chief Jason Simmons