

PREA Staffing Plan Template for Small Jails



According to the National Standards to Prevent, Detect, and Respond to Prison Rape (also known as the “PREA standards”), all jails must develop, document, and comply with a staffing plan to ensure adequate levels of staffing (and video monitoring, if applicable) to protect inmates from sexual abuse (§115.13 *Supervision and monitoring*). The standards specify that the following criteria must be considered when developing a staffing plan:

- 1) Generally accepted detention and correctional practices;
- 2) Any judicial findings of inadequacy;
- 3) Any findings of inadequacy from Federal investigative agencies;
- 4) Any findings of inadequacy from internal or external oversight bodies;
- 5) All components of the facility’s physical plan (including “blind spots” or areas where staff or inmates may be isolated);
- 6) The composition of the inmate population;
- 7) The number and placement of supervisory staff;
- 8) Institution programs occurring on a particular shift;
- 9) Any applicable State or local laws, regulations, or standards;
- 10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse;
and
- 11) Any other relevant factors.

The level and type of supervision provided in each facility will depend on a variety of factors. At a minimum, jails must consider the eleven areas enumerated by standard §115.13 when developing their staffing plan, all of which are outlined in this template. The corrections agency also needs to document any circumstances when a facility deviates from the staffing plan, including the reasons for doing so.

Jails are further required to review the staffing plan annually to see whether adjustments are needed to the plan, use of monitoring technology, or the allocation of agency resources to commit to the staffing plan to ensure compliance. These reviews should be conducted in consultation with the agency PREA Coordinator. This standard requires unannounced rounds by immediate or higher-level supervisors. These rounds are outside the scope of this template and are addressed in the PREA Policy Template.

This document is intended to provide rural jails with a template for developing staffing plans in compliance with the PREA standards. Agencies can use the template as a guide, tailoring it to the target facility, taking into account staffing levels, facility structure, and available technology. Terms in all capitals and in brackets (such as “[AGENCY]”) should be replaced with facility-specific information. Text in italics is intended to prompt staff to consider the specific needs of the facility when developing its staffing plan.

Remember that once you complete the staffing plan, you will need to document any deviations from the plan, as well as the outcome of annual reviews. Refer to the PREA Policy Template for more information on these and other related policies.

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For more information on this project, creating a staffing plan to prevent sexual abuse, or for a sample PREA staffing plan, contact JDI at info@justdetention.org or (213) 384-1400.

[AGENCY] PREA Staffing Plan **[DATE]**

[AGENCY] has developed the following plan to ensure adequate staffing levels and video monitoring to protect inmates from sexual abuse:

Insert your agency's staffing plan here, including staff to inmate ratios, frequency and nature of rounds, use of video or other monitoring technology, and other components of your plan. Be as detailed as possible and address all of the considerations below.

In developing the above staffing plan, [AGENCY] considered the following factors:

- 1) Generally accepted detention and correctional practices: *Refer to the National Institute of Correction (NIC)'s Staffing Analysis Workbook for Jails (available at <http://static.nicic.gov/Library/016827.pdf>), American Correctional Association (ACA)'s Core Jail Standards, or similarly peer reviewed document.*
- 2) Any judicial findings of inadequacy: *Indicate if any inadequacies have been found in the agency's staffing or supervision by any courts (such as a circuit or appellate court), and how your agency is addressing these deficiencies in the current staffing plan.*
- 3) Any findings of inadequacy from Federal investigative agencies: *Indicate if any inadequacies have been found in the agency's staffing or supervision by any Federal investigative agencies (such as the U.S. Department of Justice), and how your agency is addressing these deficiencies in the current staffing plan.*
- 4) Any findings of inadequacy from internal or external oversight bodies: *Indicate if any inadequacies in your agency's staffing or supervision have been found by any internal or external oversight bodies (such as an Office of the Inspector General, an accrediting body, or the U.S. Department of Justice), and how your agency is addressing these deficiencies in the current staffing plan.*
- 5) All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated): *Indicate how the various components of your facility's physical plant were considered in creating your staffing plan, including any areas that can be accessed by inmates and staff. Include "blind spots" or other areas that are not visible to staff, as well as areas in the facility with minimal staffing (such as the kitchen or other places where inmates may congregate without constant supervision by custody staff).*
- 6) The composition of the inmate population: *Indicate how the composition of your facility's inmate population was taken into consideration when creating the staffing plan. Agency staff should prepare a detailed analysis of the inmate population, including an examination of demographic characteristics such as age,*

sex, race, ethnic origin, sexual orientation, gender identity, security levels, designation of individuals with specific risk factors (such as serious persistent mental illness, intellectual disabilities, physical disabilities) and/or predatory risks – such as gang affiliation, prior violent outbursts, poor disciplinary history, etc.

- 7) The number and placement of supervisory staff: *Indicate how your facility considered the number of supervisory staff on each shift, their rank, and the areas they supervise within the facility. Small jails, in particular, will want to note their strategy for ensuring adequate supervision in facilities where there may be few intermediate-level supervisors.*
- 8) Institution programs occurring on a particular shift: *Indicate how your facility determined where it would assign staff to cover any programs – such as visitation, recreation, education classes, etc – on given shifts when determining staffing levels. Facilities should demonstrate their methodology for assigning staff to various shifts based on programs.*
- 9) Any applicable State or local laws, regulations, or standards: *List any State or local laws, regulations, or standards regarding staff supervision. These laws typically indicate a specific staff to inmate ratio that may be required in a particular jurisdiction or type of facility.*
- 10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse: *Provide an explanation for how the number of incidents of sexual abuse (both substantiated and unsubstantiated) were taken into account when determining the staffing plan. For example, if most allegations of sexual abuse occur in the evenings, your agency may need to assign more staff or supervisors to night shifts.*
- 11) Any other relevant factors: *Consider including operations factors such as key control and monitoring of movement of staff and inmates (such as how rounds are documented); transportation policies (i.e., who transports inmates and, if another agency transports, how safety is ensured); how contractual and volunteer staff are supervised; procedures for emergencies that might lead to a staff shortage.*