

PREA Facility Audit Report: Final

Name of Facility: East Hidalgo Detention Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 07/19/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Robert Manville	Date of Signature: 07/19/ 2023

AUDITOR INFORMATION	
Auditor name:	Manville, Robert
Email:	robertmanville9@gmail.com
Start Date of On-Site Audit:	06/12/2023
End Date of On-Site Audit:	06/14/2023

FACILITY INFORMATION	
Facility name:	East Hidalgo Detention Center
Facility physical address:	1300 Texas 107, La Villa, Texas - 78562
Facility mailing address:	PO BOX 239, La Villa , Texas - 78562

Primary Contact	
Name:	Gwenn Perez
Email Address:	gperez@geogroup.com
Telephone Number:	9564756106

Warden/Jail Administrator/Sheriff/Director	
Name:	LaVaughn Garnto
Email Address:	lgarnto@geogroup.com
Telephone Number:	956-262-4142 ext. 25

Facility PREA Compliance Manager	
Name:	Gwenn Perez
Email Address:	gperez@geogroup.com
Telephone Number:	O: 9564756106

Facility Health Service Administrator On-site	
Name:	Jaynee Palomin
Email Address:	spalomin@geogroup.com
Telephone Number:	956-262-4142 ext 255

Facility Characteristics	
Designed facility capacity:	1432
Current population of facility:	1050
Average daily population for the past 12 months:	1048
Has the facility been over capacity at any point in the past 12 months?	No

Which population(s) does the facility hold?	Both females and males
Age range of population:	18-68
Facility security levels/inmate custody levels:	Medium
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	263
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	6
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	0

AGENCY INFORMATION

Name of agency:	The GEO Group, Inc.
Governing authority or parent agency (if applicable):	
Physical Address:	4955 Technology Way, Boca Raton, Florida - 33431
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:

Name:	Jose Gordo
Email Address:	jgordo@geogroup.com
Telephone Number:	5618930101

Agency-Wide PREA Coordinator Information

Name:	Manuel Alvarez	Email Address:	Manuel.Alvarez@geogroup.com
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Facility AUDIT FINDINGS

Summary of Audit Findings

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:

10	<ul style="list-style-type: none"> • 115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator • 115.17 - Hiring and promotion decisions • 115.22 - Policies to ensure referrals of allegations for investigations • 115.35 - Specialized training: Medical and mental health care • 115.41 - Screening for risk of victimization and abusiveness • 115.51 - Inmate reporting • 115.67 - Agency protection against retaliation • 115.81 - Medical and mental health screenings; history of sexual abuse • 115.83 - Ongoing medical and mental health care for sexual abuse victims and abusers • 115.86 - Sexual abuse incident reviews
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Number of standards met:	
35	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-06-12
2. End date of the onsite portion of the audit:	2023-06-14

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Mujeres Unidas (Women Together)

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1500
15. Average daily population for the past 12 months:	1432
16. Number of inmate/resident/detainee housing units:	17
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	1014
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	12
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	1
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	2
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	950
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	3

<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>2</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>3</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>No text provided.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>263</p>
<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>0</p>

<p>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>6</p>
<p>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>No text provided.</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>29</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p> <input type="checkbox"/> Age <input type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>I interviewed detainees from each of the housing units.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>

57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	19
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	2
61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1

63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	2
64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	5
65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	5
66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	1
67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	1
68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	3

<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Facility Administrator and RHU supervisor were interview and stated they had no one involuntary or voluntary housed in the restrictive housing unit for risk of victimization. I reviewed the log book of all detainees in the Restrictive Housing Unit including status and purpose of their being housed in the Restrictive Housing Unit.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>I had an interpreter during the interview with detainees. The actual number was much higher than the detainees identified as LEP, however some of the detainees that were LEP were utilized as random sampling.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>27</p>

<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>12</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)

- Agency contract administrator
- Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- Line staff who supervise youthful inmates (if applicable)
- Education and program staff who work with youthful inmates (if applicable)
- Medical staff
- Mental health staff
- Non-medical staff involved in cross-gender strip or visual searches
- Administrative (human resources) staff
- Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- Investigative staff responsible for conducting administrative investigations
- Investigative staff responsible for conducting criminal investigations
- Staff who perform screening for risk of victimization and abusiveness
- Staff who supervise inmates in segregated housing/residents in isolation
- Staff on the sexual abuse incident review team
- Designated staff member charged with monitoring retaliation
- First responders, both security and non-security staff
- Intake staff

	<input type="checkbox"/> Other
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	3
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

84. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Was the site review an active, inquiring process that included the following:	
85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
88. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).

The East Hidalgo Detention Center (EHDC) is located at 1300 East Highway 107, LaVilla, Texas. The facility was acquired from LCS Corrections in 2015 by the GEO Group, Inc. (GEO). GEO contracts with the United States Marshal Services (USMS), with the contract including the United States Immigration and Customs Enforcement (ICE) to provide detention to detainees in the country illegally, as well as pending trial or sentencing.

During the site review the locations of cameras and mirrors, room layout, restrooms and the placement of PREA posters and information was observed. Facility notices in English and Spanish provided during the Pre-Onsite Audit Phase were found displayed in numerous locations throughout the facility. No correspondence was received from detainees of the East Hidalgo Detention Center. PREA posters with detainee PREA reporting information were posted in all housing units and Third-Party Reporting posters were posted in the lobby area, in the visitation waiting area, the staff break rooms and on staff bulletin boards.

The USMS Office of Inspector General (OIG) number was called on a detainee telephone. Detainees are instructed to dial “*5” to reach OIG. Also, the number for ICE detainees to reach the Department of Homeland Security reporting line, “*4” and the number to reach Mujeres Unidas, “*6”, were dialed. Detainees are not required to enter their pin number to make any of these calls and to ensure confidentiality, the calls are not monitored or recorded. Each call was answered with a recording for detainees to leave a message and staff would reply. The PREA compliance manager received a call from the USMS office and a follow-up email of the call. The staff at the victim advocacy program advised the caller that if this were an emergency call 911 or find a person they trust. She then asked if I was calling to make a claim or to talk to a counselor. When I chose to talk to a counselor, I was connected to a staff that indicated she would provide counseling, or we

set up a time for the person to come to the center. When I advised I was calling from a Detention Center, she indicated that she could talk now or could make arrangements to have time to call or visit the facility to talk to the detainee.

During the site review, random detainees were informally interviewed about their knowledge of PREA. When detainees informally and formally interviewed were asked if they feel safe from sexual abuse at this facility, they all responded they did. The detainees knew the PREA compliance manager and most indicated they had talked to her.

Restrooms in the open dorm housing pods have partial wall barriers in front of toilets and have shower curtains on showers for privacy. Single cell housing units have toilets, sinks and showers with curtains within each cell. All restrooms and shower areas were found to afford detainees privacy while toileting, showering and changing clothing.

There is a small control booth in each housing unit. Signs on the entry of each housing unit remind staff to make opposite gender announcements. These announcements are documented in the Housing Logbook and on Opposite Gender Announcements forms signed by opposite gender staff when they enter the housing unit. Detainees have access to a button in their housing units to communicate with security staff in the control booth.

Open dorm housing units have telephones within the dorms, one phone in smaller pods and two phones in larger pods. Single cell housing has portable phones for detainee use. Large laminated posted PREA information, with English on half of the poster and Spanish on the other half, are posted by the telephones.

The East Detention Center has 256 cameras. There were 22 cameras installed since the last PREA audit, two in each suicide cell (8), nine in intake and five in RHU. There are cameras in hallways and sally ports of all

housing units and in common areas of the facility. Housing units that have more than 16 detainees have cameras in the dorm. Camera monitors are located in Central Control and the Facility Director, Assistant Facility Director, the Chief of Security, the PREA Compliance Manager and Shift Commanders have access to cameras on their desktops. Control booths in housing units have camera access. DVRs are located in locked mechanical closets in each housing unit. DVR's retain data from 45-60 days. The facility administrator shared the project that has been proposed to upgrade the camera system to new high-definition cameras and monitors with additional storage space for longer retention of recordings.

There are recreation areas located on this compound including an activity center, exercise equipment, hobby craft rooms, and an outside recreation area. There is a computer area that inmates can utilize to access learning programs. Zero-tolerance posters are located throughout the recreation area. The restrooms in each of the recreational areas include partitions to provide privacy.

The Psychology Department contains a small conference room and individual offices for staff. There is a bulletin board that includes several information posters for inmates and a hotline number for PREA complaints.

The Receiving/Discharge area has holding cells with partitions for inmates to use restrooms in privacy. There is also an area for strip searches and for inmates to change clothes in privacy. There are offices located in this area which allow private interviews to be conducted. There were zero-tolerance posters in the intake area. The auditor watched an intake and found that staff provided the detainee with PREA brochure, a detainee handbook and have them sign a statement that they understand the zero tolerance, how

to make a report, and they have the right to make a report and the right not to be sexual abused or sexual harassed. During the intake the PREA video was playing in each of the holding rooms. Detainee was called out by the nurse and by a case manager during the intake process. The nurse was completing a medical appraisal while the case manager was interviewing a detainee in a separate private room. The case manager was reviewing the detainee information provided by the USMS and reviewing the information with the detainee. She then was noted asking the detainee questions from the GEO initial PREA screening assessment.

Staff were noted engaging in conversations with detainees and were willing to talk to the auditor. When asked about training, all indicated they received training every year and usually every rotation during shift briefings. Two of the staff that indicated they had been in corrections for over 25 years talked about how they felt "PREA was a good thing and it had made the prison a safer place." Staff were able to tell what they would do if a detainee claimed they were in fear of being sexual abused or sexually harassed.

Documentation Sampling

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?

Yes

No

91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

The human resource files of twenty employees, and two contractors were reviewed to determine compliance with criminal background check procedures. Files reviewed showed criminal background checks are being conducted for pre-employment and annually. Files reviewed showed employees at the time of annual performance evaluations complete a PREA Disclosure and Authorization Form - Annual Performance Evaluation Form (PREA - 101). The same form was found on the new staff application form, and when staff or promoted. For consideration for promotions or transfers, employees complete a PREA Disclosure and Authorization Form Promotions - PREA Related Positions (PREA-102). Files reviewed were in excellent order and complete with required documentation. The files also included a notification from Nueces County for NCIC background clearance completed.

The auditor reviewed staff training files to include pre-training and annual training documentation. There were thirty files of staff training acknowledgement sheets reviewed and maintained by the auditor to include cross- gender training and annual PREA training.

Twenty-five random detainee records were reviewed to determine compliance with PREA education requirements and screening procedures. The review of records showed on day of arrival detainees receive the Inmate Handbook and GEO's Sexual Assault Awareness Program brochure and view the PREA: What You Need to Know video. The detainee records also included Detainee Files Reviewed: •Identification Number • Date of Birth • Date of Arrival • Date of Screening • Date of Follow-up Screening • Date of Mental Health referral.

Ten mental health referrals and initial mental health documentation were reviewed with the Mental Health staff.

In the interview with the PREA Compliance Manager, since the last PREA audit there were a total of 11 PREA allegations reported and

investigated by the USMS. All investigative files were reviewed.

Documentation of unannounced PREA rounds were requested for the month of May. Review of documentation provided showed unannounced PREA rounds are being conducted by the Staff Duty Officers during their duty week. All housing units and departments are visited. These rounds are documented on the Unannounced PREA Rounds form.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

92. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	6	5	6	5
Staff-on-inmate sexual abuse	1	0	1	0
Total	7	5	7	5

93. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	2	0	2	0
Staff-on-inmate sexual harassment	2	0	2	0
Total	4	0	4	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

94. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	2	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	2	0	0	0	0

95. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	2	2	2	0
Staff-on-inmate sexual abuse	0	0	1	0
Total	2	2	3	0

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

96. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual harassment	1	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

97. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	1	1	0
Staff-on-inmate sexual harassment	0	0	1	1
Total	0	1	2	1

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	7
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<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>6</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.
SUPPORT STAFF INFORMATION	
DOJ-certified PREA Auditors Support Staff	
115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input type="radio"/> Yes <input checked="" type="radio"/> No

Non-certified Support Staff

116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.

Yes

No

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?

The audited facility or its parent agency

My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

A third-party auditing entity (e.g., accreditation body, consulting firm)

Other

Standards	
Auditor Overall Determination Definitions	
<ul style="list-style-type: none"> • Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions) 	
Auditor Discussion Instructions	
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>	

115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Policy 5.1.2 Zero Tolerance Toward Sexual Abuse and Harassment</p> <p>GEO Organizational Chart</p> <p>East Hidalgo Detention Center (EHDC) Policy 1300.05 Sexual Abusive Prevention and intervention</p> <p>EHDC Organizational Chart</p> <p>Employee Handbook</p> <p>Detainee Handbook</p> <p>Medical SANE</p>

MOU Victim Advocate

115.11 (a): GEO Corporate Policy 5.1.2 -and EHDC 1300.05 meets the requirements of this standard. Both policies include definitions of prohibited behaviors and sanctions for those found to participate in these prohibited behaviors. The policies include a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of inmates. Both policies were found to be comprehensive and address all provisions of the PREA standards, exceeding the requirements of this standard. The agency's zero tolerance against sexual abuse is clearly established and the policy outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment allegations. The agency and institution policies outline a zero-tolerance policy for all forms of sexual abuse and sexual harassment. Detainees are informed orally about the zero-tolerance policy and the PREA program during in-processing and additional admission and orientation presentations. The orientation is offered in English and in Spanish. Additional program information is contained in the Detainee manual, and postings distributed throughout the facility (observed during the tour). All written documents are available in English and Spanish. Additional interpretive services are available for detainees who do not speak or read English. Both institution staff and detainees are provided with a wealth of opportunities to become aware of PREA policies and procedures. All employees receive initial training and annual training, as well as updates throughout the year. The institution meets the standards with all the programs they have implemented to ensure the detainees and staff understand its position on zero tolerance. Yearly GEO conducts a PREA review of the facility to determine level of compliance and to identify concerns that need to be addressed by the PREA compliance manager and the facility administrator.

115.11 (b): GEO employs an upper-level, agency-wide PREA Coordinator at the corporate level. The agency's organizational chart depicts the position within the agency. The PREA Coordinator oversees the agency's efforts to comply with the PREA standards in all of GEO's facilities. GEO has a team of staff that support the PREA coordinator's efforts in meeting all PREA standards. Each of the GEO Regions has a PREA Coordinator who assists the Agency's PREA Coordinator with all PREA related matters for the institutions in the specific region. The administrative team meets on a regular basis to develop strategies to establish a culture that provides a safe environment for staff and detainees. The PREA Coordinator's team are very knowledgeable about PREA and best practices to carry out the Agency's approach to prevent, detect, and respond to sexual abuse or sexual allegations.

115.11 (c): GEO ensures that all its facilities have a PREA Compliance Manager with sufficient time and authority to coordinate the facilities PREA efforts. The facility's organizational chart illustrates the PREA Compliance Manager's position within the facility. At East Hidalgo Detention Center, the PREA compliance manager is supervised by the Facility Administrator. EHDC provides support staff for assisting the PREA compliance manager with her task in carrying out the PREA mandates from GEO. The administrative team meets on a regular basis to develop strategies to establish a culture that provides a safe environment for staff and detainees. Though out the tour, staff, and detainees knew the PREA compliance managers name and

	<p>role at the facility. Both the GEO Group PREA Coordinator and Facility Compliance Manager advised they have sufficient time and authority to coordinate efforts to comply with PREA standards. The facility provides additional support for PREA related investigations, policy reviews, mock audits and follow up to corporate PREA coordinator's office with questions or concerns.</p> <p>Exceed Compliance was determined by review of agency organization chart, agency, and facility policies, both staff and detainee training orientation power point presentations, posters, offender manual and interviews with staff, contractors, volunteer, and detainees further provided compliance with this standard. GEO Cooperation employs full time staff to assist the PREA Coordinator, facility administrators, and facility PREA compliance managers. GEO Cooperation also is proactive in all investigations including reviews of investigations by local, regional and headquarters staff including sexual harassment investigations. All audits are reviewed in each level of the agency to review best practices noted by the auditor and areas that need to be reviewed by the agency based on a facility audit.</p>
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115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation was reviewed in formulating compliance with this standard:</p> <p>GEO Policy 5.1.2-A</p> <p>Statement of Fact</p> <p>GEO is a private provider and does not contract for the confinement of their detainees; therefore, this standard is not applicable to this facility. The contracting statement of work mandates that East Hidalgo Detention Center remain in full compliance with PREA standards.</p>

115.13	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in determining compliance with this standard:</p> <p>GEO Corporate PREA Policy 5.1.2-A</p>

EHDC Policy 1300.05

Facility Staffing Plan

EHDC Unannounced

PREA Documentation of Unannounced Rounds.

Annual Facility Assessment

Staff Rosters (3) shifts

Camera Inventory/Locations

115.13 (a)(b): GEO Group requires the facility to review the staffing plans on an annual basis. Interviews with the facility administrator and executive staff revealed compliance with PREA, and that other safety and security issues are always a primary focus when they consider and review their respective staffing plans. The facility has a Staffing Report that is developed for each pay period. The Center provides the bimonthly reports that includes mandatory post and hold over staffing to meet the mandatory posts. This report also includes the number of positions authorized, the number filled, the number vacant, recruitment efforts and any staffing concerns during the pay period. The facility administrator meets weekly with his executive staff, including Chief of Security, Lieutenant, and the Human Resource Manager (HRM) to address staffing issues as they relate to the PREA. The staffing plan is based on a population of 1336 detention detainees. The staffing plan is based on the following criteria: - Generally accepted detention and correctional practices. - Judicial findings of inadequacy. - Findings of inadequacy from Federal investigative agencies. - Findings of inadequacy from internal or external oversight bodies. - All components of the facility's physical plant. - The composition of the detainee population. - The number and placement of supervisory staff. - Institution programs occurring on a particular shift. - Applicable State or local laws, regulations, or standards. - The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and - Other relevant factors. The institution has been provided with all necessary resources to support the programs and procedures to ensure compliance with the PREA standards. The audit included staff interviews, and rosters. Supervisory and Administrative staff members routinely make unannounced rounds. These rounds are documented in Unit Logs located in each housing unit. There have been no judicial findings of inadequacy from federal investigative agencies or findings of inadequacy from internal or external oversight bodies relevant to this standard. All essential posts are filled each shift and no essential posts are kept open for salary savings. When programs are offered, staffing is increased to provide additional supervision. There has been no deviation from the staffing plan based on interviews with facility administrator and PAQ.

115.13 (c): GEO Policy mandates that whenever necessary and no less that annually, the staffing plan is reviewed and documented on the Annual PREA Facility Assessment. The latest assessment at East Hidalgo Detention Center was approved with no finding on September 15, 2022. This completed form is submitted to the

	<p>Corporate PREA Coordinator and the Corporate Divisional Vice President for signature and approval of any recommendations made to the established staffing plan to include the deployment of video monitoring systems and other monitoring technologies or the allocations of additional resources to maintain compliance to the plan. In interview with GEO's PREA Coordinator, he reported being consulted regarding assessments or adjustments to the staffing plan through incident reviews of substantiated and unsubstantiated allegations and through the Annual PREA Facility Assessments, he reviews and approves for each of the agency facilities annually.</p> <p>115.13 (d) East Hidalgo Detention Center has a policy and practice requiring department heads, facility executive staff and intermediate and higher-level custody supervisors conduct and document unannounced rounds on all shifts within their respective areas to identify and deter employee sexual abuse and sexual harassment. Policy also mandates that other staff are prohibited from telling other staff when supervisors are making unannounced rounds. The review of Administrative Staff unannounced PREA rounds logs confirmed that intermediate-level or higher-level supervisors, including shift supervisors and department heads, conduct and document such visits throughout the institution, during the day, at night and on the weekends. Additionally, the intermediate and administrative staff were interviewed. Administrative staff visits areas of the facility during days, evenings, and weekends. The administrative intermediate staff document the visits on logbooks located in the housing unit control room. Staff members interviewed verified they are prohibited from alerting other employees regarding unannounced rounds. Interviews with detainees and housing unit officers also confirmed that random, unannounced rounds are conducted by intermediate and administrative staff daily, including nights and weekends. The administrative Lt. for each shift was interviewed. Each indicated that they visit each living unit a minimum of once per shift. The control room staff document these visits on the unit log. The auditor reviewed logbooks during the tour and found multiple signs in documentation on each shift. While touring the control room, the control room officers showed her computerized PREA rounds documentation. The facility provided a page on one of the logbooks from three areas on a specific date that documented that a supervisors visited the unit on each shift.</p> <p>An examination of policy and supporting documentation and all interviews confirm compliance with this standard.</p>
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115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>EHDC Policy 1300.05</p>

	<p>GEO Cooperate Policy 5.1.2-A</p> <p>EHDC Contract for Service</p> <p>Statement of Fact</p> <p>The East Hidalgo Detention Center does not house youthful detainees. Compliance was determined by review of Contract for Services, policy and interviews with intake staff, facility administrator and agency head. EHDC Policy 1300.05 mandates that were a detainee under the age of 18 were to arrive at the center, the detainee would be placed in the intake area until the client can arrange to have the youth moved to a juvenile program.</p>
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115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following polices, directives and documentation was reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>GEO PREA LMS Training Presentation</p> <p>EHDC Policy 1300.05</p> <p>Training records- Cross Gender Pat Searches & Searches of Transgender & Intersex</p> <p>Strip Search Log</p> <p>Picture of staff announcing when they enter the housing units.</p> <p>Shift Logs- Announced gender presence</p> <p>Statement of Fact</p> <p>PAQ</p> <p>115.15 (a): EHDC Policy 1300.05 mandates that cross-gender strip or cross-gender body cavity searches are prohibited, except in exigent situations or when performed and documented by a medical practitioner. All staff confirmed they are not allowed to conduct cross-gender searches except in exigent circumstances. Staff were able to articulate what an exigent circumstance would entail.</p> <p>115.15 (b): The facility house male and female detainees. The facility maintains a log of all strip searches. This log indicates date, time, purpose and offender’s gender and gender of persons conducting the strip searches. According to information provided</p>

on the Pre-Audit Questionnaire, there were no pat-down searches of female detainees conducted by male staff. Per agency and facility policy, the facility does not restrict access to available programming or other outside opportunities in order to comply with this provision. In interview with female detainees, the facility is complying with policies and this standard.

115.15 (c): The facility does house female detainees. Officers are required to document all cross-gender strip searches and cross-gender visual body cavity searches. All interviewed inmate detainees indicated that men do not work on their units.

115.15 (d): Policy EHDC Policy 1300.05 and GEO Corporate Policy 5.1.2-A enables detainees 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. The living areas showers have curtains that provide for detainee privacy while showering. Toilet areas have partitions with doors to allow detainees to use the restroom without being viewed by staff. The medical area has a wraparound curtain for privacy during examinations. All toilets in the living units have partitions and a wall in front of the toilet to provide privacy. All other areas that were reviewed during the tour had partitioned or single toilets with a door to provide privacy. All detainees stated they can shower, use the toilet and change clothes without being seen by staff members. The facility has implemented a policy that all opposite gender staff working the units will announce themselves prior to walking the range to allow detainees the opportunity to prepare themselves from a privacy perspective. Detainees interviewed acknowledged they were allowed to shower, dress and use the toilet without being viewed by staff of the opposite gender. Opposite gender staff are required to announce their presence when reporting for duty and when entering housing units or restrooms. These announcements are documented on the Opposite Gender Announcement log. Copies of these logs showing entries of opposite gender announcements were provided for review prior to the onsite audit and observed in use during the onsite audit visits. Signs stenciled on entry of housing units remind opposite gender staff to announce their presence when entering housing units. In interviews with staff and detainees and as observed while onsite, opposite gender announcements are being made and documented.

115.15 (e): GEO policy 5.1.2-A and facility policy 1300.05 address searches of transgender and intersex detainees. Facilities shall not search or physically examine a transgender or intersex detainee solely to determine their genital status. If the genital status is unknown, it may be determined during private conversation with the individual, by reviewing medical records or by learning this information as part of a broader medical examination conducted in private by a medical practitioner. In information provided by the facility, in the past 12 months there were no searches of transgender or intersex detainees conducted for the sole purpose of determining the detainee's genital status.

115.15 (f): All staff at EHDC receive training on how to conduct cross-gender pat searches and searches of transgender and intersex detainees in a professional and

	<p>respectful manner. Staff receive Limits to Cross Gender Viewing & Searches training. The lesson plan of this training was provided for review. Staff sign a PREA Basic Acknowledgement form acknowledging receipt and understand of the training received. Review of random staff training records and in interview with security staff, revealed staff are receiving this training at pre-service and annually. Interviews with staff confirmed that they were aware of the prohibition of visual body cavity or strip searches of the detainees of the opposite sex except in exigent circumstances.</p> <p>During the initial tour and whenever the auditor went into the living units to conduct interviews, staff announce their presence. Detainees that were in the shower area were not visibly naked to any staff and remained in the showering area while the auditor and staff visited the area. Detainees interviewed indicated they are not seen naked by any staff and they respect the center's staff and would not be naked in view staff.</p> <p>There were no cameras that provided a view of the showering and dressing areas in any of the living units and medical examination rooms.</p> <p>Based on the review of policies and notices regarding the presence of female staff in the units, observation of the showering/dressing areas and interviews with staff and detainees it has been determined that EHDC is in compliance with this standard.</p> <p>At the time of the onsite audit visit, there was one transgender detainee assigned to East Hidalgo Detention Center the facility and no intersex detainees. The transgender detainee was given the choice of being searched by a male or female staff member. She had no preference for pat searches.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>EHDC Policy 1300.05</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>Written Material for low vision/disabilities TTY Communications</p> <p>GEO training Curriculum for Vulnerable Persons and Persons with disabilities</p> <p>Tablet for use of deaf detainees</p>

Bilingual Staff

PREA Brochures English/Spanish Detainee Handbook

Language Line Solutions Reference Guide

115.16 (a): GEO Policy 5.1.2-A Sexual Abuse/Assault Prevention and Intervention and EHDC Policy 1300.05 mandates that the facility shall not discriminate against detainees with known disabilities and shall provide reasonable accommodations to ensure access to programs, activities, and services in accordance with the Americans with Disabilities Act and the provisions established in this Policy. Many of the detainees at EHDC are English as a second language or are LEP. The facility has several bilingual staff at the facility and interviews with detainees and staff indicated they knew staff members that were bilingual and utilized their services in communicating with the detainee population. The auditor interviewed several LEP detainees during the on-site audit. Due to the large number of Spanish speaking residents, it was not considered in the choosing of residents to interview. A translator was with the auditor throughout the two days that detainees were interviewed. Through policy and practice, the facility staff ensures that detainees with all disabilities listed in 115.16a have an equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment. The facility has TTY machines for hard or hearing detainees. There were no hearing-impaired detainees during the audit. There were limited vision detainees during the audit. They indicated they received information in large print and had the ability to view large print on the Tablets.

115.16 (b)(c): The ESL detainees interviewed stated they were instructed about PREA compliance and felt safe from sexual abuse. All PREA related information (written information), including postings, brochures and handouts are available in English, and Spanish. One detainee that was interviewed indicated they received the orientation, screening and training using an interpreter. However, the written material he received during intake was in English. The PREA compliance manager provided written material in Spanish and sent a reminder to the intake staff to make sure Spanish speaking detainees receive written material in Spanish. The facility has access to translation services and written access in other languages. Staff also may read information to detainees when necessary. Agency and facility policies prohibit detainees to be relied on as readers or any types of assistants, except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety. The facility maintains a list of staff that are bilingual. The detainees verified that every memo that is posted and all posters are in English and Spanish.

Compliance of this standard was confirmed by review of agency policy, contracting services for language interpretation services and interviews with PCM, Case Manager, Medical Administrator, limited vision and ESL detainees.

115.17 Hiring and promotion decisions

Auditor Overall Determination: Exceeds Standard

Auditor Discussion

The following policies, directives and documentation were reviewed in formulating compliance with this standard:

GEO Policy 5.1.2-A EHDC Policy 1300.05

New Hire Application

New Hire Background Check New Hire Acceptance Letter Contractor Background Check

Yearly Background Checks

5-year Accurate Background Check-

Employee 5-year PREA Disclosure Waiver

Annual PREA Disclosure Promotion Letter Promotion PREA Disclosure PREA Background Check

Random Background Checks for new hires, five-year tenured staff, promotions and contractors.

PAQ

115.17 (a): GEO Policy 5.1.2-A and EHDC Policy 1300.05 stipulates all employees, contractors and volunteers have had criminal background checks completed prior to being employed by EHDC The facility does not hire or promote anyone who may have contact with detainees, and does not enlist the services of any contractor or volunteer that may have contact with detainees, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force or coercion, or if the victim did not consent or was unable to consent or refuse, or if the person has been civilly or administratively adjudicated to have engaged in the activity. Incidents of sexual harassment are considered in determining whether to hire or promote anyone or to enlist the services of any contractor or volunteer who may have contact with detainees. Interview with the Human Resource Manager and review of random employee, contractor and volunteer files were used to verify compliance to this standard.

115.15 (b): Prior to being promoted staff complete a promotion PREA disclosure form. GEO and the facility consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with detainees. Interview with the Human Resource Manager and review of the disclosure form confirmed this practice.

115.17 (c): The agency requires that all applicants and employees who may have

contact with detainees have a criminal background check. Criminal background checks for all potential employees are completed through the Nueces County Sheriff's office and through a contract with Accurate background checks. For those considered for promotions or who transfer from another facility, an internal GEO PREA verification and a background check through the Accurate are completed. If an applicant answers on their application, they are a prior institutional employee, information from prior institutional employers shall be requested. According to the Pre-Audit Questionnaire, in the past 12 months, there were 66 background checks completed.

115.17 (d): The facility performs criminal background checks through the Karnes County Sheriff's office before enlisting the services of any contractor or volunteer. In information provided on the Pre-Audit Questionnaire, in the past 12 months there were 66 criminal background checks conducted for staff and 7 background check for a contractor. The auditor reviewed 14 staff personnel files and 5 contractor's background and found they had background checks completed prior to employment.

115.17 (e): A review of random staff and contractors with five years tenure verified that criminal background checks are conducted every five years for all employees and contractors. The facility conducts background checks on all staff on a yearly basis.

115.17 (f): EHDC asks all applicants and employees who have contact with detainees directly about previous sexual misconduct. Applicants are asked these questions on the GEO application. Employees and contractors complete a PREA Disclosure and Authorization Form - Annual Performance Evaluation annually. For consideration for promotions or transfers, employees complete a PREA Disclosure and Authorization Form Promotions as well as a GEO internal PREA verification.

115.17 (g): Employees and contractors have a duty to disclose such misconduct referenced in this standard. Material omissions regarding this type of misconduct would be grounds for termination. The submission of false information by any applicant is grounds for not hiring the applicant.

115.17 (h): Unless prohibited by law, GEO will 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 the individual has applied for work.

Compliance was determined by pre audit documentation, the PAQ, interviews with the human resources director and review of random staff files including new hires, promotions and five-year tenured staff and contractor files. All required information was noted utilizing the PREA Employee/Contractor worksheet.

115.18	Upgrades to facilities and technologies
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	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>The following policies, directives and documentation were reviewed in determining compliance with this standard:</p> <p>Facility Camera System</p> <p>Annual PREA Assessment</p> <p>Monitoring System Upgrades</p> <p>Statement of Fact</p> <p>There have been no additional modifications or expansions to RCF during the last audit period. The facility has made upgrades to the camera system utilizing advanced enhanced cameras and monitoring programs. Compliance was determined by review of facility camera coverage and interviews with Agency Head Designee, GEO Group PREA coordinator, Facility Administrator and Chief of Security (Major). The facility is in the process of upgrading all cameras and monitors to new high-definition cameras. These cameras provide the ability to zoom in and out, scan the areas, and are truly high definition. This upgrade will include replacing 225 cameras, adding additional cameras and upgrading the monitoring capabilities to additional storage for long life of the recording from the camera system.</p> <p>In interview with the Vice President, Risk Management (agency head designee) he stated that the agency uses technology to assist the facilities in keeping inmates safe from sexual abuse. If new facilities are designed or there are modifications to existing facilities, the agency's PREA Coordinator works closely with the Corporate Project Development Team.</p> <p>Compliance was determined by review of the existing camera system and review of the proposed additional camera system.</p>

<p>115.21</p>	<p>Evidence protocol and forensic medical examinations</p>
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-E - PREA Investigation Procedure</p> <p>EHDC Policy 1300.05</p>

MOU with Mujeres Unidas

Documentation of Attempt to establish and MOU for SANE Evaluation

Interview with McAllen Medical Center

Interview with Mujeres Unidas

MOU Crisis Center Hotline

Coordinated response plan SOF.

PAQ

115.21 (a): GEO policy 5.1.2-E, and facility policy 1300.05 outline the agency/facility's requirements as it applies to this standard. The policy addresses the requirements of the facility in response to reports of sexual abuse allegations. USMS conducts all criminal investigations and in coordination with East Hidalgo Detention Center is responsible to determine if the USMS are going to conduct administrative investigations of sexual abuse or refer the allegation back to EHDC for investigations. The USMS and EHDC follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence. In interviews with random staff, they knew how to preserve the evidence and the crime scene to ensure usable evidence is maintained for investigative purposes. Staff have cards they carry on them while on duty that includes uniform evidence protocol. In cases of a sexual assault the facility would activate the Coordinated response plan which provides guidance and a checklist for each staff involved to document their actions in a sexual assault.

115.21 (b): The agency and facility follow a protocol developmentally appropriate for youth where applicable and adapted from or otherwise based on the U.S. Department of Justice's office on Violence Against Women Publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents". East Hidalgo Detention Center does not house youthful offenders.

115.21 (c): Facility medical staff do not perform forensic medical exams. Victims of sexual abuse have access to forensic medical exam by a Sexual Assault Nurse Examiner (SANE) at no cost to the victim. Victims of sexual abuse will be transported to the McAllen Medical Center. In information reported on the Pre-Audit Questionnaire, in the last 12 months there were no SANE exams performed.

115.21 (d): The facility has an MOU with Mujeres Unidas to provide confidential emotional support services to victims of sexual abuse. In an interview with the PREA Compliance Manager, she ensures the MOU meets the qualifications described in the standard because the standard language is written within the MOU. The MOU details the victim advocacy program providing an advocate to accompany detainees that are victims of sex abuse and includes the qualification of the victim advocate and the services they would provide.

115.21 (e): The medical center staff indicated they have a SART team that includes a victim advocate to meet with the victim prior to the examination and would

	<p>accompany the victim for any law enforcement interviews. As requested by the victim, a victim advocate from Mujeres Unidas would be provided to accompany a detainee victim of sexual abuse through the forensic exam procedures.</p> <p>15.21 (f): Based on statement of fact by EHDC facility administrator, outside Law Enforcement conducts all criminal investigations. Facility investigator conducts administrative investigations if requested by USMS. USMS may conduct the administrative investigation. The investigators are trained investigators and follow the requirements of paragraphs (a) through (e) of this section.</p> <p>Compliance of this standard were confirmed by review of the policies, attempts to establish and MOU, Statement of Fact, PAQ, investigative files and interviews with McAllen Medical Center, Mujeres Unidas, two (2) Investigators, PREA compliance manager, and facility administrator.</p>
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115.22	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Exceeds Standard</p>
	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <ul style="list-style-type: none"> EHDC PREA Case Tracking Log Referral for OPR Investigative Report Referral to Outside Agency GEO Corporate Website Posting PAQ GEO policy 5.1.2-E EHDC Policy 1300.05 <p>115.22 (a): GEO policy 5.1.2-E, and facility policy 1300.05 outline the agency's policy and procedures for investigating and documenting incidents of sexual abuse and sexual harassment. The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. All investigations involving staff are referred to GEO's Office of Professional Responsibility (OPR). In the past 12 months there were 11 allegations of sexual abuse/ sexual harassment received. The US Marshall Services were provided information on the incidents. The US Marshall Services and EHDF work together to review and investigate all investigations. Upon receiving the allegations of sexual abuse or sexual harassment, the US Marshall services can refer back to LaVilla Police</p>

	<p>Department for criminal investigation or the facility for administrative investigation. However, based on interviews with the PREA compliance manager, who is the lead investigator for the facility, the USMS conduct an investigation on all allegations made at the facility. The facility and USMS coordinate gathering information, and providing this information to the USMS. THE USMS interviews all victims and abusers as well as witnesses.</p> <p>115.22 (b): GEO policy ensures that allegations of sexual abuse or sexual harassment that appear to be criminal be referred for investigation to an agency that has the legal authority to conduct criminal investigations. Based on a statement of fact by EHDC facility director, The facility documents all referrals of allegations of sexual abuse or sexual harassment for criminal and administrative investigation. All allegations are documented and tracked on the PREA Case Tracking Log.</p> <p>Interview with facility investigators confirmed this procedure. The agency policy regarding the administrative investigation of allegations of sexual abuse or sexual harassment and referrals for criminal investigations is published on the agency website and can be accessed at https://www.geogroup.com/PREA.</p> <p>In interviews with the facility investigators and review of the investigative files is was determined that the facility and USMS have a best practice program where the client and GEO investigators are actively involved in all allegations of sexual abuse or sexual harassment investigations.</p> <p>115.22 (c): Information published on the GEO website describes the responsibilities of the agency and the investigating agency in the investigation of allegations of sexual abuse and sexual harassment.</p> <p>Exceed Compliance was determined by review of investigations, policy, statement of fact, GEO website and interviews with investigator, agency head, PREA coordinator, PREA compliance manager and facility administrator.</p>
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115.31	Employee training
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>2022 PREA Basic Training</p>

PREA Training on Cross Gender, Transgender and Intersex Searches. PREA Basic Training Acknowledgment

Pre-Service & In-Service Cross Gender Pat Searches & Searches of Transgender & Intersex

(Pre-Service & In-Service) Acknowledgment of Receipt of Training & Brochures

(Pre-Service & In-Service) Annual In-Service Training Record

115.31 (a): GEO employees receive training on GEO's zero-tolerance policy (5.1.2-A) for sexual abuse and sexual harassment at pre-service and annually at in-service. The agency's requirement for this training is found in GEO policy 5.1.2-A, and facility policy 1300.05. The 2022 DOJ PREA Training curriculum was reviewed and found to address all elements of this provision of this standard as required. Staff receive three hours of classroom PREA training facilitated by the PREA Compliance Manager during pre-service. Annually staff and contractors are required to complete a two-hour online training through the Learning Management System (LMS) and quarterly supervisors provide one-hour of classroom PREA instruction.

All staff are provided training that includes all areas of PREA training and protocol for sexual abuse prevention, intervention, reporting, and protecting the detainees and preserving the possible crime scene. The facility receives training developed for GEO and includes films, power point presentations, and lectures. Training includes: ■ Zero-tolerance policy for sexual abuse and sexual harassment ■ How to fulfill staff responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures. ■ Detainees' right to be free from sexual abuse and sexual harassment. ■ The right of detainees and employees to be free from retaliation for reporting sexual abuse and sexual harassment. ■ Dynamics of sexual abuse and sexual harassment in confinement. ■ Common reactions of sexual abuse and sexual harassment victims. ■ How to detect and respond to signs of threatened and actual sexual abuse. ■ How to avoid inappropriate relationships with detainees. ■ How to communicate effectively and professionally with detainees, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming detainees. ■ How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. ■ How to conduct cross gender pat searches: Newly hired employees receive training relative to PREA standards during their initial training in a classroom setting. The facility conducts training on a quarterly basis. The training is conducted in the classroom and computer-based training.

115.31 (b): EHDC Policy 5.1.2 recognizes that the facility houses male and female detainees. Policy mandates that the facility will be required to modify training to meet the needs of a different population. Staff assigned to specialized Post such as transportation officers, supervisors, and investigators receive additional training.

115.31 (c): According to the computer database for training, all staff have received training in the last 12 months. Staff interviewed indicated they had received additional refresher training during the last six months. At EHDC staff receive annual

	<p>in-service training. Between training, the facility shifts briefings and staff meetings include PREA refresher information training. In interviews with staff, many indicated they receive emails regarding PREA updates and information. Staff carry “What to do” PREA cards to aide in how to report, respond, and intervene to PREA incidents.</p> <p>115.31 (d): Upon completion of PREA pre-service and annual in-service training, staff sign a an EHDC Acknowledgement of Receipt of Training and Brochures. They also sign a PREA Basic Acknowledgment Training form upon completion of general PREA training and a Cross Gender Pat Searches and Searches of Transgender and Intersex acknowledgment form.</p> <p>A review of the training curriculum, training sign-in sheets and other related documentation, as well as staff interviews, confirmed staff are required to acknowledge, in writing, not only that they received PREA training, but that they understood it. A review of documentation and staff interviews further confirmed that the facility is in compliance with this standard. The auditor reviewed 25 staff training records including the facility director, PCM, shift supervisor, investigator, medical and random staff.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>Volunteer Training</p> <p>Training Acknowledgment of Receipt of Training Brochures</p> <p>115.32 (a): EHDC Policy 1300.05 mandates that all volunteers and contractors who have contact with detainees have been trained on their responsibilities under the agency’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures. There have been 3 contractors trained in the last 12 months.</p> <p>115.32 (b)(c): All contractors receive the same PREA training as employees prior to assignment and sign a PREA Basic Acknowledgement Form and an Acknowledgement of Receipt of Training and Brochures Sexual Assault Prevention form. The volunteer training curriculum was provided for review. The training included agency’s zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they</p>

	<p>have with detainees Volunteers receive this training annually and sign a Documentation of Volunteer Training Form. Volunteer training is maintained in the volunteer files, while contractor documentation of training is maintained by the training coordinator.</p> <p>A review of random contractor training files and interviews with commissary and medical staff confirmed compliance with the standard. Further compliance was determined by interviews with the training coordinator. The facility is in the process of restarting the volunteer program and at the time of the audit had no volunteers.</p>
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>Detainee Handbook</p> <p>Receipt of training for new arrivals</p> <p>Detainee PREA Brochure</p> <p>Facility PREA Postings Detainee's Tablet Detainee Receipt of PREA</p> <p>Brochure Detainee</p> <p>Receipt of PREA Comprehensive Education</p> <p>Detainee Orientation PowerPoint</p> <p>25 Detainee files reviewed.</p> <p>115.33 (a): GEO policy 5.1.2-A, facility policy 5.1.2 mandates all detainees receive information at time of intake and if transferred from another facility about the zero-tolerance policy and how to report incidents of sexual abuse or sexual harassment, their rights to be free from retaliation for reporting such incidents and are informed of the agency/facility policies and procedures for responding to such incidents. In interview with intake staff, on the day of arrival, detainees receive a detainee handbook, and a Sexual Assault Prevention and Reporting Information Brochure and signs a receipt for detainee handbook and disciplinary procedures form. This was observed by the audit during the intake of an offender. Also, during the intake</p>

detainees were watching a PREA video that included the same information. The information can also be found on the detainees' tablets.

115.33 (b) Comprehensive PREA education is provided to newly assigned detainees within the first 24 hours of arrival at the facility. Case Managers go to the detainees and review PREA information with them. Detainees sign the Prison Rape Elimination Act (PREA) Offender Education Program acknowledgement form acknowledging receipt of PREA education. The curriculum provided to detainees was provided for review.

115.33 (c): According to the PAQ 3547 detainees received the information at intake. All residents that arrive at the facility are provided with training during the intake process including a comprehensive training, copy of the resident handbook and PREA brochure. In interviews with 40 detainees all indicated they received training on the first or second day of their arrival. The residents indicated they are shown a video, provided a brochure, and staff discuss the PREA information while they are in the intake area. The video continues to play in the holding rooms during the intake process.

115.33 (d): All PREA education provided to detainees is in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, otherwise disabled, or have limited reading skills. The Detainee Handbook, the PREA brochure and all verbal information given is provided in both English and Spanish. A contract with the Language Training Center, Inc. provides translation of any other languages. The facility has a TTY for deaf or hard of hearing detainees as well as tablets for visual transmittal of PREA information. Eight detainees that was interviewed utilizing the disability protocol claims he received the orientation and comprehensive training through a staff interpreter Each of the detainees received all written material in Spanish. The facility has tablets that can be utilized for detainees using different languages and has access to written material in other languages.

115.33 (e): The facility maintains documentation of detainees' participation in PREA education. In review of 25 detainee files there were training records indicating the initial orientation and comprehensive training in all files.

115.33 (f): Throughout the facility were posters including Sexual Assault Prevention and Reporting Posters; GEO Zero Tolerance Posters, End the Silence Posters. These posters were informative and included telephone numbers and addresses. Also Notice of Audit was posted throughout the facility.

Based on review of the training curriculum, interviews with detainees and staff it was determined that the facility meets the standards for training detainees. Training and reporting have been uploaded to all tablets, throughout the facility. Interviews with detainees, review of the training curriculum, viewing the training program on detainee tablet exceed expectation of this standard.

115.34 Specialized training: Investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

The following policies, directives and documentation were reviewed in formulating compliance with this standard:

GEO Corporate Policy 5.1.2-A

EHDC Policy 1300.05

Specialized Investigators

General PREA Training

Specialized Investigators Certificate of Completion of Specialized Training

PREA Training Acknowledgment

Current Specialized Investigators

Training Curriculum

115.34 (a): GEO Corporate Policy 5.1.2-A and EHDC Policy 1300.05 mandates that in addition to the general training provided to all employees pursuant to §115.31, the agency ensures that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings.

115.34 (b): The facility Investigators have completed investigating sexual abuse in a confinement setting and additional online training on investigating sexual abuse. Training includes Investigating Sexual Abuse through GEO training staff. The training curriculum was reviewed and included interviewing sexual abuse victims, proper use of the 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.

115.34 (d): The facility has three trained investigators. The agency maintains documentation that investigators have received specialized training on conducting sexual abuse investigations in confinement settings. Upon completion of the training, investigators receive a certificate of completion. In review of investigators' training files, investigators have completed this specialized training, as well as general training provided to all employees and documentation is maintained by the facility. In the interview with the facility investigators, they confirmed receiving specialized training and general PREA education provided to all employees and were able to confirm the topics included in the specialized training they received.

Compliance was determined by review of the training curriculum, investigator training records, investigators certificate of completion, investigative reports, and interviews with PREA coordinator, Agency Head, investigators, and facility administrator.

115.35	Specialized training: Medical and mental health care
	<p data-bbox="256 188 991 221">Auditor Overall Determination: Exceeds Standard</p> <p data-bbox="256 264 544 297">Auditor Discussion</p> <p data-bbox="256 340 1422 418">The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p data-bbox="256 454 671 488">GEO Corporate Policy 5.1.2-A</p> <p data-bbox="256 524 555 557">EHDC Policy 1300.05</p> <p data-bbox="256 593 820 627">Medical Specialized Training Curriculum</p> <p data-bbox="256 663 544 696">Medical Staff Roster</p> <p data-bbox="256 732 635 766">PREA Training Certification</p> <p data-bbox="256 801 820 835">Mandatory Pre-Service PREA Questions-</p> <p data-bbox="256 871 1182 904">Nurse Acknowledgment of Receipt of Training & Brochures- Nurse</p> <p data-bbox="256 940 1485 1243">115.35 (a): The medical staff at EHDC received generalized training and specialized training through GEO. The training curriculum includes how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment, how and to whom to report allegations or suspicions of sexual abuse and sexual harassment as well of many other medical and mental health topics such as clinical interventions, and local policies.</p> <p data-bbox="256 1256 1278 1346">115.35 (b): The medical and mental health staff do not conduct forensic examinations.</p> <p data-bbox="256 1382 1485 1550">115.35 (c): Staff received a certification on completion for specialized training. They sign an acknowledgement of generalized PREA training. All medical staff that received the training in the last 12 months. Both documents were provided in the pre audit documentation and verified through interviews with a contracting nurse.</p> <p data-bbox="256 1585 1382 1664">115.35 (d): All medical staff attend the same training as required mandated for employees by §115.31</p> <p data-bbox="256 1700 1485 2069">The mental health staff indicated that he has received the GEO training and additional training through his continuing education required training. He also serves as part of the victim retaliation monitoring program and has received training on signs of detainees being retaliated against for allegation of sexual abuse or sexual harassment. The medical administrator interviewed indicated the facility has a continuous training program with sexual abuse and victimization. The nurse interviewed indicated that the medical staff have training programs utilizing supplement flyers on sexual abuse and managing transgender and intersex detainees as a team.</p>

	Exceeded compliance was determined by review of the training curriculum, copy of certificate and acknowledgement statement and interviews with the medical administrator and mental health director.
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115.41	Screening for risk of victimization and abusiveness
	<p>Auditor Overall Determination: Exceeds Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>EPDF Policy 1300.05</p> <p>SAAPI Risk Assessment completed within 72 hours.</p> <p>SAAPI Re-Assessment within 30 days.</p> <p>PAQ</p> <p>Review of twenty-five (25) resident files</p> <p>115.41.(a): Facility policy 1300.05 requires all detainees to be assessed for their risk of being sexually abused or sexually abusive towards others within 24 hours of arrival or transferred to the facility. According to information provided on the Pre-Audit Questionnaire, in the past 12 months, 3547 detainees assigned to the East Hidalgo Detention Center were assessed for their risk of victimization or abusiveness upon arrival. This includes detainees that transferred to the facility from other detention centers or other confinement settings.</p> <p>115.41 (b): Intake screening takes place within 24 hours of detainees' arrival at the facility. The process that is utilized includes part of the initial intake. Once the detainee is searched, they receive PREA pamphlets and handbooks. During that time the case manager or staff assigned to conduct the screening review the detainees file and meets with the detainees. During this meeting staff introduce PREA to the detainee and explain the purpose of the screening with the detainees. The detainee is then asked to sign to acknowledge they have received the screening. If the detainee has past history of victimization or predator behavior the screening staff completes a referral that is sent to the medical staff to refer to the mental health staff to set up an interview with the detainee. Medical and mental health staff are available during the screening process conducting a medical review and suicide screening.</p> <p>115.41 (c) Intake risk assessment is conducted by a case manager, assigned to the intake office, using GEO SAAPI Risk Assessment, an objective screening tool. Intake staff scan the risk assessments and e-mailed to Classification, medical, the PREA Compliance Manager, the Facility Administrator, the Assistant Facility Administrator and the Chief of Security.</p>

115.41 (d)(e): The screening includes the screener's thorough review of any available records available to assist with determining the detainee's risk assessment. The Intake Sexual Violence Assessment Tool was reviewed. It contains:

- Whether the detainee has a mental, physical, or developmental disability?
- The age of the detainee?
- The physical build of the detainee?
- Whether the detainee has previously been incarcerated?
- Whether the detainees' criminal history is exclusively nonviolent?
- Whether the detainee has prior convictions for sex offenses against an adult or child?
- Whether the detainee is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming?
- Whether the detainee has previously experienced sexual victimization?
- The detainee's own perception of vulnerability?
- Perpetrators of sexual abuse during incarceration?
- Prior conviction of violent offenses?
- History of Assaultive Conduct in DOC in the past 5 years?
- Whether the detainee is detained solely for civil immigration purposes

41 115.41 (f): Within a set time period, not to exceed 30 days of detainees' arrival to the facility, detainees are reassessed by intake Case Manager for their risk for victimization and abusiveness using the Follow-up, Annual & Reassessment Sexual Violence Assessment Tool. In information provided on the Pre-Audit Questionnaire, 3547 detainees entering the facility were reassessed within 25 to 30 days of arrival.

115.41 (g): A detainees' risk level will also be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information. Annually during annual classification review assessments, detainees are reassessed for risk of victimization or abusiveness using the Reassessment Sexual Violence Assessment Tool.

115.41 (h): Policy mandates that detainees are not disciplined for refusing to answer any questions or for not disclosing complete information. Interviews with screening staff confirmed they would not discipline or coerce an offender to answer Screening questions.

115.41 (i): Only the facility administrator, PREA compliance manager, assistant facility administrator, chief of security and case manager have access to screening information.

Interviews with the staff that conducts screening indicated that prior to the screening staff review the detainees past history, background documentation and other information provided by the US Marshalls. They did discuss the purpose of the screening instrument and discuss options for housing assignments. Detainees that have a past history of victimization or is determined by the screening instrument or by the screeners concern of the detainee's safety or referred to the mental health staff during this process. The Mental Health staff usually comes to the intake area when he receives the email that is generated during the intake process. He explains his role at the facility and offers to see the detainee as a follow-up the next day. Interviews with random detainees indicated they are usually seen by the Mental Health staff on the first day they arrive at the facility. The Mental Health professional is bilingual.

Exceed Compliance was determined by interview with Case Managers, Mental Health

	<p>staff and the PREA Compliance Manager and in review of random detainee records. In interviews with detainees, they confirmed they were screened upon arrival to the facility and remembered being asked PREA questions again by their case manager or the PREA compliance manager.</p>
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 5.1.2</p> <p>At Risk Log</p> <p>PREA Bed Locations Form Transgender Care Committee</p> <p>PREA Reassessment of Transgender Detainees</p> <p>115.42 (a): GEO policy 5.1.2-A, explains the use of PREA screening information. The agency uses the information from the risk screening form to make housing, bed, work, education and program assignments with the goal of separating detainees at high risk of being sexually victimized from detainees with those at high risk of being sexually abusive. The facility maintains a bed location chart that determines the at-risk detainees and possible predator detainees. The case manager supervisor and PREA compliance managers explained that prior to assigning an offender to a bed the intake staff reviews the open beds to determine the rooms that house at risk and possible predator detainees. This same information is utilized in programming and work assignments for detainees. Due to the large number of gang affiliated detainees the facility has four housing units that are utilized to house at risk residents and at the same time managing the gang affiliated detainees. There are no units that are utilized to house gay, transgender, or intersex detainees.</p> <p>115.42 (b): Individualized determinations are made about how to ensure the safety of each offender. Detainees who score at risk of victimization or abusiveness are referred for further evaluation with the Mental Health provider. Detainees have an option of refusing these services. Those identified to be at risk are tracked on a Current Detainees Likely PREA Victims/Predators report maintained current on a GEO database.</p> <p>115.42 (c): GEO policy and EPDF Policy 1300.05 mandates that making housing and programming assignments for transgender or intersex detainees, the facility will consider on a case-by-case basis whether the placement would present management</p>

or security problems. Detainees who self-disclose being gay, bisexual, transgender or intersex are tracked on a LGBTI List that is maintained by the PREA Compliance Manager. Transgender and intersex detainees are housed after meeting with the Transgender Care Committee (TCC). The PREA Compliance Manager, Chief of Security, Classification Supervisor and Health Services Director make up the TCC. The TCC meet with the detainee, complete a GEO Statement of Search/Shower/Pronoun Preference Form and documents the meeting on the Transgender Care Committee Summary. At the time of the on-site audit visit, there was one detainee who self-disclosed being transgender or intersex assigned to the facility. Based on interviews with intake staff and transgender people interview, the detainee was asked about her safety during the intake process and again during the meeting with the TCC.

115.42 (d) - (f) A transgender or intersex detainee's housing and program assignments will be reassessed every six months to review any threats to safety experienced by the offender. Transgender and intersex detainee placement and programming are reviewed as needed, but at least every six months. A transgender or intersex detainees' own views of their safety is taken into consideration. When the TCC meets with transgender or intersex detainees they are given an opportunity to express their views. In conversation with the TCC committee, each member indicated that the agency and facility would house detainees based on his/ her views unless it would jeopardize the safety and security of the facility. Transgender and intersex detainees are offered the opportunity to shower separately from other detainees as indicated in their Statement of Search/Shower/Pronoun Preference Form. GEO does not place lesbian, gay, bisexual, transgender or intersex detainees in dedicated units or wings solely based on such identification. In interview with one detainee who self-disclosed being gay, he did not feel he was housed any differently because of his sexual orientation. During the review period there were three detainees that claim prior victimization or prior sexual predator behavior that were interviewed by the auditor. All were seen by the mental health staff and were offered mental health services within three days of arriving at the facility. The facility maintains a spreadsheet that includes the date of arrival, the date referred to Mental Health and the date Mental Health conducted the initial assessment.

The interview with the gay, lesbian and transgender detainees indicated they felt safe at the facility and that the mental health, classification staff and PREA compliance manager were readily available to discuss any concerns they have had in the past.

Compliance was determined by review of policy and forms and interviews with the PREA coordinator, PREA compliance manager, agency head, review of the detainee data base, interviews with transgender, gay and lesbian detainees and facility administrator.

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>Statement of Fact PAQ</p> <p>115.43 (a): GEO policy 5.1.2-A, and facility policy 1300.05 were used to determine compliance to this standard. The East Hidalgo Detention Center does not place detainees at high risk for victimization in involuntary segregated housing unless an assessment of all available alternatives has been made and a determination has been made that there is no available alternative.</p> <p>115.43 (b): Detainees placed in segregated housing for this purpose have access to programs, privileges, education and work opportunities to the extent possible. The facility will document and justify any restrictions imposed.</p> <p>115.43 (c): The facility will assign such detainees to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, not to exceed a period of 30 days. The facility administrator indicated that any detainee placed in restrictive housing unit or reviewed in the first three days, then within seven days and then monthly.</p> <p>115.43 (d): If involuntary segregated housing assignment is made, the facility will document the basis for the facility’s concern for the detainee’s safety and the reason no alternate means of separation can be arranged.</p> <p>15.43 (e): In cases where involuntary segregated housing is used for longer than the initial 30 days, the facility will review the status every 30 days to determine if ongoing involuntary housing is needed.</p> <p>According to information provided on the Pre-Audit Questionnaire and in interview with the facility administrator and security staff who supervise detainees in RHU, in the past 12 months there has not been a time that an offender found at high risk of victimization or a detainee who alleged sexual abuse was placed in involuntary segregated housing.</p> <p>Compliance was determined by review of the restrictive housing unit logs including all of the detainee in the restrictive housing unit during the audit, and interviews with restrictive housing unit supervisor, PREA compliance manager, and facility administrator.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion

The following policies, directives and documentation were reviewed in formulating compliance with this standard:

GEO Corporate Policy 5.1.2-A

EPDF Policy 1300.05

Detainee Handbook

PREA Brochure English/Spanish

GEO Corporate Employee Reporting Instructions

Incident Report-

Report to Staff

Tablet PREA information on reporting

Employee Handbook

US Marshall Contract

GEO employee phone number

Staff information cards

115.51 (a): GEO Corporate Policy 5.1.2-A and EPDF Policy 1300.05 mandate that facilities provide multiple internal ways for detainees to privately report sexual abuse and sexual harassment, provide multiple internal ways for detainees to privately report retaliation by other detainees or staff for reporting sexual abuse and sexual harassment, provide multiple internal ways for detainees to privately report staff neglect or violation of responsibilities that may have contributed to such incidents. Policies also mandate that a private entity or office able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials and that the private entity or office allow the detainee to remain anonymous upon request. Detainees are informed in the Inmate Handbook Rules and Regulations and on posters they can report to any staff member, contractor, or volunteer. They can report to their family who can report for them.

115.51 (b): The facility also provides multiple external ways for detainees to report allegations to a public or private agency that is not part of GEO. The detainees can dial *3 to reach the USMS, detainees can dial *10 to reach the Office of the Inspector General, ICE detainees can dial *5 to reach the Department of Homeland Security (DHS) and all detainees can reach Mujeres Unidas by dialing *6 on detainee telephones. Detainees interviewed were aware of the methods of reporting available to them. When interviewed the PREA Compliance Manager confirmed the methods of reporting available to detainees and staff. All listed hotlines were called and were able to leave a detailed message. The call to the USMS was followed up by a call from the USMS to the PREA compliance manager to verify receiving the report. The staff at the victim advocate center asked the auditor if he had an emergency to call 911 or

	<p>report to closest staff. If I was calling about emotional support, they would connect me with an emotional support staff member. How to contact the consults office posters are found in the detainee handbook and on poster throughout the facility.</p> <p>115.51 (c): Staff interviewed were aware of the requirement to accept reports made verbally, anonymously and from third parties. All staff interviewed indicated they would document verbal reports immediately and notify the shift supervisor by phone or in person.</p> <p>Detainees interviewed were aware of the multiple reporting systems. One detainee showed the auditor where the information is located on the Tablet. However, the tablet can not be utilized to make the call or notifications.</p> <p>115.51 (d): Staff have access to private reporting by calling the Employee Hotline (866-568-5425) or the Corporate PREA Coordinator (561-999-5827). Information for detainee and staff reporting was found on the GEO website (https://www.geogroup.com/PREA. Third Party Reporting posters and Page 4, section I of the Employee Handbook informs employees of their responsibility of reporting sexual abuse and sexual harassment and their reporting options. Staff carry with them a Sexual Abuse First Responder Card, which has the employee hotline number and the website address for anonymous reporting. Staff interviewed knew how to privately report sexual abuse and sexual harassment of detainees.</p> <p>The auditor called this number and spoke with a member of the GEO Coordinators office. Exceed compliance was determined by testing the telephone system, reviewing policies and procedure, posters, and the detainee handbook. Exceed compliance was also determined by interviews with detainees, staff, shift supervisors, PCM, and facility administrator.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>Detainee Handbook</p> <p>Grievance form</p> <p>Referral for OPR Emergency Grievance</p>

115.52 (a) GEO policy 5.1.2-A, EPDF Policy 1300.05 provides a procedure in place for detainees to submit grievances regarding sexual abuse and the agency has procedures for dealing with these grievances. Poster located throughout the facility advise resident that they may file a grievance. The detainee handbook explains the process for filing a grievance. Any grievance that alleges sexual abuse, sexual harassment, retaliation for reporting an allegation or for cooperating in an investigation will be immediately forwarded to Investigators and GEO OPR.

115.52 (b): There is no time limit when a detainee can submit a grievance regarding sexual abuse. GEO does not impose a time limit to any portion of a grievance that does not allege an incident of sexual abuse. Detainees are not required to use any informal grievance process or attempt to resolve with staff an alleged incident of sexual abuse. Agency policy does not restrict GEO's ability to defend against a lawsuit filed by a detainee on the grounds that the applicable statute of limitations has expired. The PREA Compliance Manager receives all copies of grievances related to sexual abuse or sexual harassment for monitoring purposes. In the interview with the PREA Compliance Manager and information provided on the Preaudit Questionnaire, in the past 12 months there were no PREA related grievances filed.

115.52 (c): GEO and EPDF policy provides that detainees have a right to submit grievances alleging sexual abuse to someone other than the staff member who is the subject of the complaint and the grievance will not be referred to the subject of the complaint. If a third-party file a grievance on a detainee's behalf, the alleged victim must agree to have the grievance filed on his behalf.

115.52 (d): A final decision shall be issued on the merits of any portion of the 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 individuals in the facility in preparing any administrative appeal. GEO or the facility may claim and extension of time to respond (for good cause) for up to 70 days and shall notify the individual of the extension in writing. I was recommended by the auditor that the agency and facility update the extension to be in line with the latest PREA working group modification of the standard by adding "and provide a date by which a decision will be made."

115.52 (e): Third parties such as fellow detainees, family members, attorneys or outside advocates may assist detainees in filing requests for administrative remedies relating to allegations of sexual abuse and may file on behalf of detainees. The alleged victim must agree to have the request filed on his or her behalf; however, he/she is not required to personally pursue any subsequent steps in the administrative remedy process. If the offender declines to have the request processed on his or her behalf, the agency shall document the offender's decision. In an interview with the PREA Compliance Manager and on information provided in the Pre-Audit Questionnaire, in the past 12 months, there were no grievances filed by a third party.

115.52 (f): GEO and EPDF policy provides detainees may file an emergency grievance if he/she is subject to substantial risk of imminent sexual abuse. After receiving an emergency grievance of this nature, the facility administrator or designee will ensure

	<p>that immediate corrective action is taken to protect the alleged victim. An initial response to the emergency grievance to the individual is required within 48 hours and a final decision will be provided within five calendar days.</p> <p>In an interview with the PREA Compliance Manager and on information provided on the Pre-Audit Questionnaire, in the past 12 months, there were no emergency grievances alleging sexual abuse filed.</p> <p>115.52 (g): A detainee can be disciplined for filing a grievance related to alleged sexual abuse if it is determined that the detainee filed the grievance in bad faith.</p> <p>Compliance was determined by review of the policies, grievance, and by interviews with grievance coordinator, GEO PREA coordinator, PREA compliance managers, and facility administrator. It was recommended that 115.52 (d): add “provide a date by which a decision will be made” to the present policies. There were no grievances filed by detainees in the last 12 months and no extension was necessary in the last 12 months.</p>
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115.53	Inmate access to outside confidential support services
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>Acknowledgement of Receipt of Orientation</p> <p>Detainee PREA Handbook</p> <p>Acknowledgement of Receipt of Handbook</p> <p>MOU with Mujeres Unidas (Women’s Services)</p> <p>115.53 (a): GEO Corporate Policy 5.1.2-A addresses the agency/facility’s policies on providing detainees with access to outside victim advocates for emotional support services related to sexual abuse. East Hidalgo Detention Center enables reasonable communication between the detainees and these agencies in a confidential manner. The facility has an MOU with Mujeres Unidas. The Crisis Center was contacted and indicated they would provide emotional support for the detainee population by telephone or mail. When called from the detainee phone system, the staff asked if I wanted to talk to someone about emotional support and she forwarded the call to a counselor at the center. The counselor was bilingual and first asked if I was English</p>

	<p>and Spanish. She then told me the options to talk. She explained that our call was not being listened to, however she had a responsibility to report any sexual abuse to the local law enforcement. She indicated she had time to talk now or could set up a time with the PREA staff at the facility to talk in a private office. She indicated that if the detainee would prefer to talk in person, she would arrange a time to come to the facility and talk in a private office in the visiting room. The staff at the center indicated they had an outreach program at the facility for female detainees, however it was discontinued during the pandemic and was making plan to institute the program when they were advised the facility as going to a male only facility.</p> <p>115.53 (b)(c): Detainee's PREA Handbook provides a phone number and address of the victim advocate and emotional support center. Posters are located with the address and phone number for Mujeres Unidas (Women's Services). The same information is on the detainee's Tablets.</p> <p>Most of the detainees interviewed were aware of the emotional support program and knew they could call them by dialing *6 on the detainee telephone system. They also knew the calls were free and no one would listen to their conversations. Many of the detainees indicated that prior to calling them, they would talk to the facility mental health practitioner.</p> <p>Compliance was determined by review of handbook; review of the MOU with Mujeres Unidas and interviews with the facility PREA compliance manager and staff from the victim advocate center.</p>
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115.54	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>Third Party Reporting Posters, English/Spanish</p> <p>Website Posting- Third Party Reporting</p> <p>US Marshall Services Reporting Options.</p> <p>115.54 (a): Reporting Posters are visible in the visitation room, lobby and is found in the detainee handbook. GEO provides a reporting system on GEO Website http://www.geogroup.com/PREA (Social Responsibility-PREA Certification Section) provides information on ways for third party reporting including anonymous reporting.</p>

	<p>US Marshall Services provides information on how detainees or family members may contact the US Marshall's Services by writing, emailing or calling the US Marshall's Inspector General which is also found on the Detainee's housing bulletin boards. Family and friends can contact the facility administrator or PREA compliance managers or file a grievance on behalf of the detainees. This information is posted in areas visible to staff and visitor. Poster include anyone needed to report abuse/ sexual harassment or to report an allegation of Sexual Abuse/ Sexual Harassment on behalf of an individual who is or was housed in any GEO facility or program, may contact the facility administrator's Office in the facility where the alleged incident occurred or where the individual is housed.</p> <p>Compliance was determined by review of the postings, contacting the websites and interviews with PREA coordinator, PREA compliance manager of facility administrator.</p>
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115.61	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following polices, directives and documentation was reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>Staff training</p> <p>Specialized medical training.</p> <p>Texas Vulnerable Persons Staff Report</p> <p>115.61 (a): GEO policy 5.1.2-A and EPDF Policy 1300.05 mandates staff, volunteers and contractors must take all allegations of sexual abuse and sexual harassment seriously and are required to report immediately any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment and any retaliation against detainees or staff who reported such an incident, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. This information is to be reported to the Shift Supervisor, the PREA Compliance Manager, or facility executive staff. In interview with random staff, and contractors knew their reporting duties. Staff receive training in reporting. GEO has implemented a specialized training program for medical and mental health professionals that includes duties to report, State's vulnerable persons reporting duties and confidential reporting duties.</p>

	<p>115.61 (b): Policy and training mandates that apart from reporting to designated supervisors, staff are not to reveal any information related to a sexual abuse report to anyone. Staff, volunteers, and contractors interviewed knew this information is to be kept confidential and knew whom to report allegations.</p> <p>115.61 (c)(d): Medical specialized medical training includes medical staff are required to report sexual abuse and to inform detainees of their duty to report and the limitations of confidentiality at the initiation of services. The training also provides reporting of a vulnerable adult under a State or local vulnerable persons statute, under applicable mandatory reporting laws. The facility does not house detainees under the age of 18. Medical and mental health staff interviewed confirmed this practice. The Nurse indicated that the detainees sign a statement that includes her limitation of confidentiality.</p> <p>115.61 (e): In interview with the facility administrator and his executive team, the EPDF reports all allegations of sexual abuse and sexual harassment, including third party and anonymous reports to facility investigators, US Marshall Services, and GEO PREA coordinator or regional supervisor. There are staff reporting posters located throughout the facility. Staff carry a PREA card with this information for easy reference in making reports.</p> <p>According to statement of fact there have been no reports from third parties, contractors, or volunteers in the last 12 months.</p> <p>Compliance was determined by review of the policies, training curriculum and interviews with random staff, medical staff, and facility administrator. Interviews with the Agency PREA coordinator and agency head confirmed that GEO mandates staff, volunteers, and contracts report all sections of this standard.</p>
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115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>Texas Reporting Laws</p> <p>Customer Notification</p> <p>Statement of Fact</p>

	<p>115.62 (a): GEO Corporate Policy 5.1.2-A and EPDF Policy 5.1.2 mandates when the facility learns that a detainee is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the alleged victim. All allegations of sexual abuse are to be handled in a confidential manner and conversations with the victim sensitive, supportive, and nonjudgmental. The PAQ indicated in the past 12 months there were 12 times the agency or facility determined that an inmate was subject to a substantial risk of imminent sexual abuse: The facility administrator stated that if it was suspected a detainee was at substantial risk of sexual abuse, he would immediately move the offender and investigate. Staff interviewed were aware of their responsibilities if they felt a detainee was at subject to a substantial risk of imminent sexual abuse. Random staff and shift supervisor indicated the detainee that was in imminent danger would be separated from the accuser and would be moved to the observation room in medical and placed on one on one status until it could be investigated and determine if the detainee can be placed in another dormitory, if the staff needed to be placed on administrative leave, if the predator needed to be moved off the campus or if the victim needed to be moved pending the investigation. The facility administrator indicated this decision would be made in concert with US Marshall Services office. There has been no incident when a detainee was moved to another facility.</p> <p>During the on-site audit, the auditor was available to listen to USMS agent and the PREA compliance manager discuss a detainee that had made a cry of fear for her safety. In discussion during the exchange the USMS agent and PREA compliance manager explained that they often discuss detainees and how to protect detainees. This includes sexual victimization and predator risk. The indicated that the center and the USMS attempt to be proactive with the protection of detainees. They explained they have two dormitories for female detainees and attempt to keep predator and victims separate with this limited space.</p> <p>Compliance was determined by review of policy and interviews with the GEO agency head, PREA coordinator, PREA compliance manager, facility administrator, random staff and Major.</p>
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115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>PAQ</p>

	<p>115.63 (a)-(c): GEO Corporate Policy 5.1.2-A and EPDF Policy 5.1.2 mandates on receiving an allegation that a detainee was sexually abused while confined at another facility, the incident will be reported to the PREA Compliance Manager. The facility administrator will notify the agency or facility head where the abuse is alleged to have occurred. but no later than 72 hours of receiving the allegation. The PREA Compliance Manager will maintain documentation that notification was made and include all actions taken regarding the incident. Copies of this documentation will be forwarded to the GEO PREA Coordinator. There was one allegation made when the detainee arrived at EHDC that he was sexually abused at another facility. The PREA compliance manager emailed the sending facility warden and copied the facility administrator, assistant facility administrator, USMS and GEO. It was discussed with the PREA compliance manager in the future, the notification must be made directly from the facility administrator to the sending facility administrator.</p> <p>115.63 (d): Interview with the facility administrator and PREA compliance manager indicated along with notification to the sending facility administrator the facility administrator will notify US Marshall Services, and GEO PREA coordinators and will document notification of an allegation of sexual abuse or sexual harassment and offer to provide whatever services needed by the facility investigator during the investigative process. According to the statement of fact there has been one allegation of a detainee being sexually abused while confined at another facility.</p> <p>There was no need for a corrective action plan since the incident was reported and investigation occurred. Compliance was determined by review of the policy and interviews with intake staff, PREA compliance manager, agency head PREA coordinator and facility administrator.</p>
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115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>PREA Allegation Memo with First Responder and Separation</p> <p>PREA First Responder Card</p> <p>PREA First Responder</p> <p>Staff Training</p>

	<p>Contractor Training</p> <p>PAQ</p> <p>115.64 (a): GEO Corporate Policy 5.1.2-A, EPDF Policy 1300.05, and staff training requires that correction staff that are the first responders of a sexual assault shall: Separate the alleged victim and abuser, Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence, Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence. Notify the shift supervisor by telephone or in person and tell only those staff who need to know in assisting you in carrying out these responsibilities. Staff are issued a card that includes steps to take as first responders. All random staff were able to articulate their responsibilities and have received training on preserving and protecting the crime scene. There were no allegations that were made in the time period to allow for the collection of evidence or transport the victim for a SANE/SAFE assessment.</p> <p>115.64 (b): GEO Corporate Policy 5.1.2-A, EPDF Policy 1300.05, and staff training requires that non correctional staff that are first responders are required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. All contracting and non-contact staff that were interviewed knew their duties and reported they received training yearly in service and on reminder training that is sent out by the PREA compliance managers from time to time. During the last 12 months there were six allegations of sexual abuse. One of the notification of the abuse was not made to a non-security staff member.</p> <p>Compliance was determined by review of the policies and training and by interviewing non-contact staff during the onsite audit. As an auditor I randomly tour the administrative, classification area and educational areas and ask staff if I could ask them a question. After reminding them that they don't have the answer the questions I ask them, "what would you do if a detainee came to you and said they were sexual assaulted". All staff were able to articulate they would follow the above requirements.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The following polices, directives and documentation was reviewed in formulating

compliance with this standard:

EHDC Policy 1300.05

GEO Corporate Policy 5.1.2-A

East Hidalgo Detention Center Coordinated Response Plan

115.65 (a): GEO Corporate Policy 5.1.2-A mandates that facilities have a coordinated response plan. EHDC Coordinated Response Plan provides written guidance to staff and administration regarding actions to take and notifications to be made. A PREA Incident Checklist for Incidents of Sexual Abuse and Harassment is completed to ensure that all steps of the plan are carried out and proper notifications are made. The Coordinated Response Plan includes action required after report of sexual abuse:

- Initial response
- Shift supervisors Responsibility
- Notifications
- Facility Crime Scene
- Evidence Protocol
- Medical Requirements
- Mental Health Requirements
- Victim Advocacy Requirements
- SANE staff requirements
- Investigative Requirements

Each of the above responses includes but not limited to staff, contractors, victim advocates, Investigator and GEO Coordinator. The hospital staff indicated they have a Sexual Abuse Response Team that includes victim advocates to meet with rape victims prior to examination and interview with law enforcement. She indicated that were a detainee brought to the hospital following a sexual assault her team would treat the action as a rape and would activate their response team. A PREA Incident Checklist for Incidents of Sexual Abuse and Harassment is completed to ensure that all steps of the plan are carried out and proper notifications are made. All staff carry a response plan card to use as a reference in notification of a sexual assault. The Chief of Security, the PREA Compliance Manager, the Investigator, and members of the PREA team are responsible to ensure compliance to the plan. Staff interviewed confirmed that they are knowledgeable of the plan and the necessary actions to be taken in response to an allegation of sexual abuse.

Compliance was determined by review of the Coordinated Response Plan and accompanying checklist and interviews with random staff, and specialized staff responsible for carrying out the response plan.

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EPDF Policy 1300.05</p> <p>GEO Secure Services and National Federations of Federal Employee, Federal District 1, IAMW - AFL/CIO</p> <p>GEO policy states that GEO would not enter into a collective bargaining agreement or other agreements that would limit the agency’s ability to remove an alleged staff sexual abuser from contact with any offender pending the outcome of an investigation. In interview with the agency head designee, he stated GEO would not enter into any collective bargaining agreement at any of its facilities that would limit the facility’s ability to remove an alleged sexual abuser from contact with detainees pending the outcome of an investigation. East Hidalgo Detention Center union agreement includes a just cause article that provides for the facility to place staff on administrative leave pending an investigation and the nature of the discipline would be appropriate to the conduct and need not begin with the least serious disciplinary action.</p> <p>Compliance was determined by review of GEO policies, Collective Bargaining Agreement and interviews with the agency head.</p>

115.67	Agency protection against retaliation
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A EPDF Policy 1300.05</p> <p>Protection from Retaliation Logs Statement of Fact</p> <p>115.67 (a): GEO has as policy to protect detainees who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff. The policy provides procedures to protect</p>

individuals in GEO facilities. The PREA compliance manager has been appointed with the responsibility of carrying out these procedures.

115.67 (b): The GEO procedure states the agency has multiple protection measures, such as housing changes or transfers for detainees, victims or abusers, removal of alleged staff or detainee abusers from contact with victims and emotional support services for detainees or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. If any other individual who cooperates with an investigation expresses a fear of retaliation, appropriate measures to protect that individual against retaliation are put in place.

115.67 (c): Detainees who allege sexual abuse will be monitored by the PREA compliance manager and mental health staff who will meet weekly with the alleged victim beginning the week following the incident and continue monitoring for at least 90 days or longer if there is a continuing need. The Human Resource Manager will monitor the conduct and treatment of employees who reported staff misconduct or employee witness who cooperate with these investigations every 30 days for 90 days. Retaliation monitoring of detainees is documented on the Protection from Retaliation Log. There were four monitoring logs reviewed by the auditor. The mental health staff indicated that he meets with the detainee that makes an allegation as soon as he is made aware of the allegations and discusses his role to provide emotional support and monitor him on a daily basis for retaliations.

115.67 (d): GEO procedure also requires monitoring of detainees includes periodic status checks. The PREA compliance manager was interviewed and indicated she would review the monitoring logs on the data base on an ongoing basis and randomly will see the detainee during tour to check on his/her status.

115.67 (e): Retaliation monitoring may be terminated if it is determined that the allegation was unfounded. The Retaliation monitor indicated while the official monitoring will end, she would continue to check on the detainee for retaliation for making a report.

In interview with the PREA Compliance Manager and the Human Resource Manager and information provided on the Preaudit Questionnaire, in the past 12 months there were no incidents of retaliation that occurred.

Exceed Compliance was determined by review of the monitoring logs, agency policy and procedures, investigative files and interviews with the retaliation monitors, and facility administrator.

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Policy 5.1.2-A</p> <p>Statement of Fact</p> <p>PAQ</p> <p>115.68 (a): GEO Policy 5.1.2-A requires involuntary segregated housing may be used only after an assessment of available housing alternatives has shown there is no other means of protecting the detainee. All use of segregated housing to protect a detainee who is alleged to have suffered sexual abuse subject to the requirements of § 115.43.</p> <p>The East Hidalgo Detention Center has not utilized voluntary or involuntary restrictive housing for a PREA related incident or for protection of detainees for sexual abuse in the last 12 months. In interviews with the PREA compliance manager and staff that supervises the Restrictive Housing Unit, any detainee that was place in voluntary or involuntary segregation for fear of sexual abuse or retaliation of reporting sexual abuse would be afforded all of the requirement required in standard 115.43.</p> <p>Compliance was determined by review of the PAQ and interviews with restrictive housing supervisor and facility administrator.</p>
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115.71	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-E- PREA Investigation Procedure EHDC Policy 1300.05</p> <p>EHDC PREA Tracking Log Report of Investigation</p> <p>PAQ 115.71 (a): GEO Corporate Policy 5.1.2-E and EHDC Policy 1300.05 requires an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment at the East Hidalgo Detention Center, promptly, thoroughly, and objectively, including third party and anonymous reports. In the past 12 months there were 11 allegations of sexual abuse or sexual harassment that were reported by detainees or third parties. All allegations were reported to the US Marshall. The USMS conducted or assisted in all investigations during the last 12</p>

months. The EHDC Investigator work closely with the US Marshalls in conducting all investigations. The USMS may refer back to the facility for some or all of the investigation or may conducted the investigation and request relevant information from the Investigator to determine staffing, camera footage or staff failure was determined to be a contributing factor in the finding of unsubstantiated or substantiated.

115.71 (b): The facility has three trained investigators and facility investigators have completed specialized training in the investigation of sexual abuse allegations in a confinement setting. The facility provided documentation of completion of specialized investigative training completed by facility investigators. Two of the investigators were interviewed and were extremely knowledgeable regarding conduct investigations in a confinement setting.

115.71 (c): It is the responsibility of investigators to gather and preserve circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data. Investigators will interview alleged victims, suspected perpetrators and witnesses and review prior reports of sexual abuse involving the suspected perpetrator.

115.71 (d): When the quality of evidence supports criminal prosecution, the agency will conduct compelled interviews only after consulting with prosecutors.

115.71 (e): 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 a detainee or staff. A detainee who alleges sexual abuse is not required to submit to a polygraph examination.

115.71 (f): The administrative investigation will include an effort to determine whether staff actions or failures to act contributed to the abuse. The administrative investigation shall be documented in a written report and include a description of the physical and testimonial evidence, the reasoning behind credibility assessments and investigative facts and findings.

115.71 (g): A criminal investigation shall be documented in a written report that contains a thorough description of physical, testimonial and documentary evidence. The facility shall request a copy of completed investigative reports from the EHDC. Allegations will be tracked on the PREA Tracking Log. USMS Provides investigative reports would be provided to the facility at the conclusion of an investigation. The facility uploaded two of the investigation and the auditor uploaded two of the investigation for documentation.

115.71 (h): Substantiated allegations of conduct that appears to be criminal shall be referred for criminal prosecution. On information reported on the Pre-Audit Questionnaire and in interview with facility investigators, since the last PREA audit there no allegations of sexual abuse referred for prosecution. Criminal investigations are conducted by the LaVilla Police Department or US Marshall OIG. If an allegation involves staff, notification is made to GEO's Office of Professional Responsibility for investigation.

	<p>115.71 (i): The agency will retain all written reports as long as the alleged abuser is incarcerated or employed by the agency, plus five years.</p> <p>115.71 (j): The departure of an alleged abuser or victim from employment or control of the facility or agency, shall not provide a basis for terminating an investigation</p> <p>115.71 (k)(l): When outside agencies investigate sexual abuse allegations, the facility will cooperate with investigators and will try to remain informed about the progress of the investigation. In interview with the PREA Coordinator, he reported that facilities are required to check in with outside investigators at a minimum of every 14 days and document that contact was made to ensure that requirements such as retaliation monitoring and notices of outcome of investigations are completed as required. In interview with facility investigators, they were knowledgeable of their responsibilities of conducting administrative investigations of all allegations received and knew when to refer allegations that appear to be criminal for criminal investigation. The facility has an MOU with LaVilla Police Department to conduct all criminal investigations. US Marshalls are sworn officers and also conducts investigations.</p> <p>Compliance was determined by review of policy, training curriculum, investigative reports and interview with trained investigators.</p>
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115.72	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-E.</p> <p>EHDC Policy 1300.05</p> <p>Report of Investigation</p> <p>Investigator training curriculum</p> <p>115.72 (a): Based on GEO policy and Investigator training the facility shall impose no standard higher than the preponderance of evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. In interview with facility investigators, they confirmed this practice.</p> <p>Compliance was determined by review of policy, training curriculum, investigative reports and interview with trained investigators.</p>

115.73	Reporting to inmates
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Auditor Overall Determination: Meets Standard

Auditor Discussion

The following policies, directives and documentation were reviewed in formulating compliance with this standard:

GEO Corporate Policy 5.1.2-A

EHDC Policy 1300.05

Investigative Reports

Notice of Outcome of Investigations

115.73 (a): GEO policy 5.1.2-E, and EHDC Policy 1300.05 indicate that following an investigation of sexual abuse of a detainee, the detainee shall be informed in writing as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded. The PREA Compliance Manager is responsible for preparing the Notification of Outcome of Allegation form and presenting it to the alleged victim for his signature. The detainee receives a copy of the form, a copy is placed in the investigative file and a copy is forwarded to the PREA Coordinator office.

115.73 (b): According to policy and PREA compliance manager if the facility did not conduct the investigation, the facility shall request the relevant information from the investigative agency in order to inform the offender.

115.73 (c): GEO policy and procedure requires following an offender's allegation that an employee has committed sexual abuse against the offender; the facility is required to inform the offender of the outcome of the investigation. The detainee is to be informed if the staff member is no longer posted within the detainee's unit, if the staff member has been indicted on a charge related to sexual abuse within the facility or if the staff member has been convicted on a charge related to sexual abuse within the facility.

115.73 (d): GEO policy and procedure requires following an offender's allegation that he has been sexually abused by another offender, the agency will inform the alleged victim if the alleged abuser has been indicated on a charge related to sexual abuse within the facility or if the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

115.73 (e): All Notification of Outcome of Allegations or attempted notifications are documented and filed in the corresponding investigative file. There have been twelve (12) notifications provided to the detainees. In interviews with the PREA compliance manager she meets with the detainee and explains the outcome of the investigation. This helps detainees know what an unsubstantiated allegation means in layman terms.

Compliance was determined by review of the investigative files, agency and facility policy and interviews with PREA compliance managers, investigators, and facility administrator.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>Staff Handbook Staff Discipline Reports to Law Enforcement</p> <p>115.76 (a): GEO Corporate Policy 5.1.2-A and EHDC Policy 1300.02 establishes the standard that employees shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse policy.</p> <p>115.76 (b): Based on GEO policy termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.</p> <p>115.76 (c): Based on GEO policy and facility director and human resources staff disciplinary sanctions for violations of agency policies related to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the act committed, the staff member's disciplinary history and the sanctions imposed for comparable offenses by other staff with similar histories.</p> <p>115.76 (d): All terminations for violations of the agency's policies on sexual abuse and sexual harassment, or resignations, shall be reported to law enforcement and licensing agencies unless the activity was clearly not criminal. In interview with the facility director the information provided on the Pre-Audit Questionnaire was one (1) staff that was terminated for sexual harassment in the past 12 months, no staff member resigned prior to the investigation of sexual abuse.</p> <p>Compliance was determined by review of the investigative files, interview with the Investigator and the facility administrator.</p>

115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-E</p>

	<p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>Statement of Fact</p> <p>115.77 (a): Any contractor or volunteer who engages in sexual abuse/sexual harassment would be prohibited from contact with detainees and would be reported to the appropriate investigator and law enforcement or relevant professional licensing/certifying bodies unless the activity was clearly not criminal in nature. Any contractor or volunteer who engages in sexual abuse even though it was not criminal will be reported to professional licensing/certifying bodies.</p> <p>115.77 (b): In cases that were not criminal in nature, the facility would take appropriate remedial measures and consider whether to prohibit further contact with detainees. During the previous year, there were no incidents where a contractor or volunteer was accused of, suspected, or found guilty of sexual abuse or sexual harassment at EHDC.</p> <p>Compliance was determined by review of the volunteer and contractor training and statement acknowledging violation of PREA standards. Also interviews with contractor, PREA compliance manger, and facility administrator confirm compliance with this standard.</p>
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115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-E</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>Detainee Handbook</p> <p>PREA Posters of Zero Tolerance Statement of Fact</p> <p>Conduct for Offender-on-Offender Sexual Activity</p> <p>115.78 (a): According to GEO policy 5.1.2-E, and facility policy 1300.05, if a detainee is found guilty of engaging in sexual abuse involving another detainee, either through administrative or criminal investigations, the offender will be subject to formal disciplinary sanctions. There was one (1) disciplinary action during the last 12 months</p>

for consensual sex between two detainees. All detainees interviewed indicated they were told it was against the rules to participate in any sexual abuse, sexual harassment or sexual activity while at the facility. The detainees are provided a handbook that clearly identifies the facility's rules against sexual activity including consensual activity.

115.78 (b): Sanctions will be commensurate with the nature and circumstances of the abuse committed, the detainee's disciplinary history and the sanctions imposed for comparable offenses by other detainees with similar histories.

115.78 (c): Based on GEO policy 5.1.2-E, and EHDC policy 1300.05, the disciplinary process may consider whether an individual's mental disabilities or mental illness contributed to his behavior when determining what type of sanction, if any, should be imposed.

115.78 (d): GEO policy if the facility offers counseling or other interventions designed to address the reasons or motivations for the abuse, the facility shall consider requiring the offending individual to participate. The referring agency will determine if the detainee will be required to participate in counseling or other interventions designed to address the reasons or motivations for the abuse. In interview of the HSA and the Mental Health Provider, they confirmed the facility does not provide counseling service or other interventions designed to address the reason or motivations for the abuse. They do provide mental health services and would review the mental health status of a detainee prior to a disciplinary hearing.

115.78 (e): GEO policy provides that disciplining a detainee for sexual contact with an employee is prohibited unless it is found that the employee did not consent to the contact.

115.78 (f): GEO policy includes the provision that 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 or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

115.78 (g): The agency prohibits all sexual activity between detainees. Facilities may not deem that sexual activity between detainees is sexual abuse unless it is determined that the activity was coerced. The one disciplinary was for consensual sex between detainees. It was investigated by the USMS, that determined there was no coercion and was therefore not sexual abuse.

Compliance was determined by review of the facility and GEO policy, review of investigator files, and interviews with the investigator, PREA compliance manager and facility administrator.

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Exceeds Standard

Auditor Discussion

The following policies, directives and documentation were reviewed in formulating compliance with this standard:

GEO Corporate Policy 5.1.2-A EHDC Policy 1300.05

Facility Intake SAAPI

Risk Assessment Referral to MH

115.81 (a): If during initial PREA screening, the detainee reports prior sexual victimization, whether in an institutional setting or in the community, staff will ensure the detainee will be referred to mental health for further evaluation within 14 days. In review of the 30-day follow-up assessments the offender discloses prior victimization not reported during initial screening, the PREA Compliance Manager will refer the detainee to mental health for further evaluation. Medical and the Mental Health Provider, according to their professional judgement, determine the nature and scope of these services. In information reported on the Pre-Audit Questionnaire, 100% of the detainees assigned to the facility in the past 12 months who disclosed prior victimization were offered a follow-up meeting with the Mental Health Provider. The facility also does a referral on all detainees that are considered at risk utilizing the Screening Instrument. The auditor was provided a spread sheet of all referrals, date of intake, date of referrals, and date seen by a mental health professional.

115.81 (b): Any detainee who reports during initial PREA screening or in follow-up screenings he has previously perpetrated sexual abuse in an institutional setting or in the community will offer a follow-meeting with medical or mental health within 14 days of the screening. According to information reported on the Pre-Audit Questionnaire, all detainees who disclosed previously perpetrating sexual abuse and were referred for follow-up with mental health. In an interview with the Mental Health Professional, he reported detainees who self-disclose initial PREA screening prior victimization or those who have previously perpetrated sexual abuse in an institutional setting or in the community are seen the next clinic day.

115.81 (d): Information related to sexual victimization or abusiveness in an institutional setting is limited only to medical and mental health practitioners and other employees as necessary to inform treatment plans, security, and management decisions or otherwise federal, state or local law.

115.81 (e): Medical and mental health providers obtain consent from detainees before reporting information about prior sexual victimization that did not occur in an institutional setting unless the victimization occurred when the detainee was a minor. Based on interview with medical provider that coordinates for mental health services for detainees who report prior sexual victimization and those who disclose previously perpetrating sexual abuse are being referred for evaluation and consent forms or refusals are being obtained.

The Mental Health provider indicated that he makes himself available when new

	<p>intakes arrive at the facility and tries to see each of the new intakes. He indicated that if any resident claims prior victimization or are considered at risk by the screeners, he sees them when they arrive and speaks with them in private and offers follow up meeting the same or following day.</p> <p>Compliance with this standard was based on policies, mental health referrals, interview with the medical administrator, intake staff, and PREA compliance manager.</p>
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115.82	Access to emergency medical and mental health services
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>Coordinated Response Plan</p> <p>Interview with McAllen Medical Center</p> <p>Statement of Fact</p> <p>115.82 (a): GEO Corporate Policy 5.1.2-A, EHDC Policy 1300.05 and the coordinated response plan provides a procedure for Victims of sexual abuse to receive timely, unimpeded access to emergency medical treatment and crisis intervention services. Medical and mental health providers, according to their professional judgement, determine the nature and scope of these services. At EHDC there are full time medical and on call mental health at the facility. The facility would transport the detainee to McAllen Medical Center and SANE services as indicated.</p> <p>115.82 (b): All staff first responders are trained to take preliminary steps to protect the victim and notify medical and mental health practitioners. Both security and non-security staff interviewed knew their first responder duties. Forensic exams are not performed by facility medical staff.</p> <p>115.82 (c): Detainee victims of sexual abuse while incarcerated are 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. Medical staff indicated that is part of the SANE process and she would follow up when the offender returns to the facility.</p> <p>115.82 (d): Based on review of GEO policy and in interviews with PREA compliance manager all services are provided without financial cost to the victim, regardless of</p>

	<p>whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>During the last 12 months there was no detainee that was transported to McAllen Medical Center sexual abuse.</p> <p>Compliance was determined by review of the coordinated response plan, interview with McAllen Medical Center, random staff, PREA compliance manager, and facility administrator.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p>Auditor Overall Determination: Exceeds Standard</p> <hr/> <p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>Mental Health evaluations</p> <p>McAllen Medical Center</p> <p>Detainee Handbook</p> <p>115.83 (a): The facility offers ongoing medical and mental health care to all detainees who have been victimized by sexual abuse. The facility utilizes telepsychology services. There is a private office for zoom conferences with patient.</p> <p>115.83 (b): The facility provides victim with medical and mental health care consistent with the community level of care, which was confirmed by interview of the nurse. The facility has full time medical staff and 12 hours of mental health services with on call mental health staff as needed.</p> <p>115.83 (c): The facility provides victims with medical and mental health care consistent with the community level of care, which was confirmed by interview of medical staff and mental health staff.</p> <p>115.83 (d)(e): Detainee victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results due to sexual abuse, the victim shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.</p>

	<p>115.83 (f): According to an interview with the nurse, detainee victims will be offered tests for sexually transmitted infections as medically appropriate.</p> <p>115.83 (g): The referrals for mental health or medical service would be initiated by medical and thus would be no charge. The facility administrator provided a statement of fact that there are no charges for detainees that are seeking treatment for victimization, sexual abuse, or sexual activity.</p> <p>115.83 (h): GEO policy and practice is for the facility to attempt to conduct a mental health evaluation of all known abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate. The center would provide follow up treatment for detainees that had a history of victimization or were victims of sexual abuse until they were transferred to an appropriate facility if indicated by the mental health staff.</p> <p>In an interview with the victim advocate, if the detainee is released from the facility, the victim advocate would continue to provide counseling, legal right information, and continue to support the victim through the court process as requested by the victim.</p> <p>Exceed Compliance was determined by review of the GEO policy, interviews with HSA, PREA compliance manager, victim advocacy services, medical center, and facility administrator.</p>
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115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>Report of Investigation After Action Reviews</p> <p>PAQ</p> <p>15.86 (a): GEO policy 5.1.2-A, requires facility to conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation in which the allegation has been determined to be substantiated or unsubstantiated. At the time of the PAQ there 11 investigation that included an incident review team meeting. The After-action reports contains all the elements of an incident review team meeting.</p> <p>115.86 (b): The review is conducted within 30 days of the conclusion of the</p>

	<p>investigation.</p> <p>115.86 (c): The Incident Review Committee consists of the facility director, Chief of Security, PREA Compliance Manager, Lead Investigator, Unit Manager, Classification Supervisor, and the HSA, and the PREA Coordinator may attend via telephone or in person.</p> <p>115.86 (d): The team considers whether the incident was motivated by race, ethnicity, gender identity, perceived status, or gang affiliation. The team examines the area where the incident was alleged to have occurred and assesses whether physical barriers in the area may have contributed to the abuse, whether monitoring technology should be deployed or augmented and whether the staffing levels at the time of the incident were adequate. There were 11 after-action reports completed during the last 12 months.</p> <p>GEO has developed an after-action report that includes all areas of the standard.</p> <p>115.86 (e): The facility will implement the recommendations for improvement or document the reasons for not doing so. The facility was found to exceed compliance with this standard. This compliance was based on review of after-action reports (IRT) and by interview with the PREA Compliance Manager, and other Incident Review team members. When interviewed, the members of the incident review team knew their responsibilities as they relate to the review of sexual abuse incidents. The facility does after action reports on Sexual harassment when substantiated or unsubstantiated.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Annual Report</p> <p>PREA Tracking Log</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>115.87 (a): GEO policy 5.1.2-A mandates that all facilities under the GEO umbrella collect uniform data for every allegation of sexual abuse at all facilities under their</p>

control. GEO requires facilities to utilize a standardized instrument that includes clearly defined definitions. The incident-based data collected shall include, at 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.

115.87 (b): The PREA Compliance Manager ensures that the data is compiled and forwarded to the PREA Coordinator monthly on the Monthly PREA Incident Tracking Log. In addition to submitting the Monthly PREA Incident Tracking Log, the PREA Compliance Manager ensures that a PREA Survey is created, updated, and submitted for review and approval in the PREA Portal for every allegation of sexual abuse, sexual harassment, sexual activity, and voyeurism. At least annually, the PREA Coordinator aggregates this data.

115.87 (c): The data collected, will be at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Bureau of Justice Statistics (BJS).

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

115.87 (e): This provision of this standard is not applicable to this facility. The agency does not contract for the confinement of detainees.

115.87 (f): Upon request, GEO shall provide such data from the previous calendar year to the Department of Justice no later than June 30. The facility provided a copy of the monthly log and annual log for review. The log contained all elements required by policy.

The review of the log and interview with PREA compliance manager and PREA coordinator confirmed compliance with this standard.

115.88	Data review for corrective action
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate PREA Procedure 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>GEO Annual PREA Data Report</p> <p>Texas State Record Retention</p>

	<p>Annual PREA assessments.</p> <p>115.88 (a): GEO reviews all of the data collected from all of its facilities and aggregates that data annually to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies, practices and training by identifying problem areas, taking corrective action on an ongoing basis and preparing an annual report of its findings. This information is provided in the annual report.</p> <p>In an interview with the agency head designee, he explained how the agency uses the incident-based sexual abuse data to assess and improve sexual abuse policies and practices.</p> <p>115.88 (b): The PREA Coordinator reviews the data collected and the annual report includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. This information is also captured in the annual PREA assessment completed by PREA coordinator's staff.</p> <p>115.88 (c): The PREA Coordinator forwards the annual report to the Senior Vice President of GEO Care and to the Senior Vice President, US Secure Services and International Operations for their signatures and approval. The report is made public on the GEO website at https://www.geogroup.com/prea.</p> <p>115.88 (d): Before making aggregated sexual abuse data public, all personal identifiers are redacted as stated on the last page of GEO's annual report. Exceed compliance of this standards was determined by reviewing annual reports for GEO, review the facility policy and interviews with the PREA coordinator and PREA compliance manager.</p> <p>The GEO annual report provides more information than is required and at the same time provides the person reviewing the report a detailed look at PREA in action in GEO facilities.</p>
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115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate PREA Procedure 5.1.2-A</p> <p>EHDC Policy 1300.05</p> <p>GEO Annual PREA Data Report</p>

	<p>Texas State Record Retention</p> <p>115.89 (a): GEO policy 5.1.2-A ensures that data collected are securely retained for at least 10 years according to GEO policy 1.1.7-A. In an interview with the PREA Coordinator, GEO ensures that data collected are securely retained for at least 10 years according to GEO policy 1.1.7-A (11) and the Texas State Records Retention Schedule Revised 4th Edition. Agency, and facility policies, state the facility will maintain sexual abuse data for 10 years.</p> <p>115.89 (b): GEO makes all aggregated sexual abuse data from all its facilities made public annually on their website at https://www.geogroup.com/prea. A review of the website confirmed that the agency has PREA reports from 2017 until 2021 uploaded in the above website. The facility has password protected computer access and non-GEO staff are not allowed to utilize their computers. All staff at the facility interviewed indicated they must go to training of handling sensitive information.</p> <p>115.89 (c): Before making aggregated sexual abuse data public, GEO removes all personal identifiers. This was confirmed by reviewing past audits and GEO annual reports.</p> <p>115.89 (d): Corporate Policy: 5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facilities ensures that data collected are securely retained for at least 10 years.</p> <p>Compliance was determined by review of three (3) annual reports, corporate policy and interview with the Agency PREA Coordinator.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO policy 5.1.2-C</p> <p>EHDC policy 1300.05</p> <p>115.401 (a): GEO policy 5.1.2-A -require during the three-year period starting on August 20, 2013, and each three-year period thereafter, GEO’s Contract Compliance Department ensures that a PREA auditor who has been certified through the Department of Justice audits each facility at least once. The initial PREA audit of The EHDC was conducted in June 2020 by a DOJ certified PREA auditor after the center went under its own contract for services with USMS. This is the second audit under the present contract. The present auditor’s certification is until December 2024.</p>

	<p>115.401 (b): According to GEO’s PREA Coordinator and the annual PREA report, during the three-year period beginning on August 20, 2013, GEO ensured that each of its facilities were audited at least once and continues to ensure that its facilities are audited every three years. During the last cycle, many audits were scheduled, rescheduled, and postponed due to the pandemic. However, each facility was audited during the last 3-year cycle. This is the first year of this cycle. According to GEO coordinator all facilities are scheduled to be audited during this cycle.</p> <p>115.401 (h): During the audit, I was allowed access to all areas of the facility. I was allowed to visit areas throughout the facility during the official tour and additional visits to different areas of the facility while interviewing and observing camera locations. I reviewed camera monitors with the Assistant Facility Administrator.</p> <p>115.401 (i): I requested personnel files, detainee files, training records, investigation files, logbooks, and pertinent forms utilized to carry out the requirement of the audit process. Each document was provided in a timely basis.</p> <p>115.401 (m): I interviewed specialized staff, random staff, random detainees, and targeted detainees during the onsite audit. No detainee declined to be interviewed and the facility did not prohibit me from interviewing detainees selected for interview. Interviews were conducted in a private area of the facility.</p> <p>115.401 (n): Detainees were notified six weeks prior to the onsite audit on posted facility notices in English and Spanish that they could send confidential correspondence to me and were given my name and mailing address. I did not receive correspondence from detainees, staff, or contractors of the East Hidalgo Detention Center.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.403 (f): Per agency policy and standard requirements, GEO ensures me that this final report will be published on their website at (https://www.geogroup.com/prea) to be available to the public. The report from 2020 located on the GEO website and reviewed and uploaded the auditor.

Appendix: Provision Findings		
115.11 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.11 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.11 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.12 (a)	Contracting with other entities for the confinement of inmates	
	If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	na
115.12 (b)	Contracting with other entities for the confinement of inmates	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure	na

	that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.)	
115.13 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Generally accepted detention and correctional practices?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any judicial findings of inadequacy?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from Federal investigative agencies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any findings of inadequacy from internal or external oversight bodies?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated)?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the inmate population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The number and placement of supervisory staff?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The institution programs occurring on a particular shift?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into	yes

	consideration: Any applicable State or local laws, regulations, or standards?	
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.13 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.13 (c)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.13 (d)	Supervision and monitoring	
	Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment?	yes
	Is this policy and practice implemented for night shifts as well as day shifts?	yes
	Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility?	yes

115.14 (a) Youthful inmates		
	Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (b) Youthful inmates		
	In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.14 (c) Youthful inmates		
	Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
	Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).)	na
115.15 (a) Limits to cross-gender viewing and searches		
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.15 (b) Limits to cross-gender viewing and searches		
	Does the facility always refrain from conducting cross-gender pat-down searches of female inmates, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A if the	yes

	facility does not have female inmates.)	
115.15 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female inmates (N/A if the facility does not have female inmates)?	yes
115.15 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enables 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?	yes
	Does the facility have procedures that enables 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?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit?	yes
115.15 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?	yes
	If an inmate's genital status is unknown, does the facility determine genital status 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?	yes
115.15 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in 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?	yes

115.16 (a)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication	yes

	with inmates with disabilities including inmates who: Have intellectual disabilities?	
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision?	yes
115.16 (b)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.16 (c)	Inmates with disabilities and inmates who are limited English proficient	
	Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?	yes
115.17 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who	yes

	may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.17 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with inmates?	yes
	Does the agency consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with inmates?	yes
115.17 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with inmates, does the agency perform a criminal background records check?	yes
	Before hiring new employees who may have contact with inmates, does the agency, consistent with Federal, State, and local law, 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?	yes
115.17 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates?	yes

115.17 (e)	Hiring and promotion decisions	
	Does the agency 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?	yes
115.17 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.17 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.17 (h)	Hiring and promotion decisions	
	Does the agency 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? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.18 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.18 (b)	Upgrades to facilities and technologies	

	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.21 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.21 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.21 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? (N/A if the agency always makes a victim advocate from a rape crisis center available to victims.)	na
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.21 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.21 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.21 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency always makes a victim advocate from a rape crisis center available to victims.)	yes
115.22 (a)	Policies to ensure referrals of allegations for investigations	

	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.22 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy and practice in place 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?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.22 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes
115.31 (a)	Employee training	
	Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes

	Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
	Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.31 (b)	Employee training	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
115.31 (c)	Employee training	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency 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?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.31 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.32 (a)	Volunteer and contractor training	

	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.32 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes
115.32 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.33 (a)	Inmate education	
	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
115.33 (b)	Inmate education	
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.33 (c)	Inmate education	
	Have all inmates received the comprehensive education referenced in 115.33(b)?	yes

	Do inmates 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?	yes
115.33 (d)	Inmate education	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes
115.33 (e)	Inmate education	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes
115.33 (f)	Inmate education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes
115.34 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (b)	Specialized training: Investigations	
	Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include proper use of Miranda and	yes

	Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	
	Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
	Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.34 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.35 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or	yes

	suspicious of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
115.35 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.35 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.35 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners employed by the agency.)	yes
	Do medical and mental health care practitioners contracted by or volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.41 (a)	Screening for risk of victimization and abusiveness	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
115.41 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.41 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective	yes

	screening instrument?	
115.41 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10)	yes

	Whether the inmate is detained solely for civil immigration purposes?	
115.41 (e)	Screening for risk of victimization and abusiveness	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, as known to the agency: history of prior institutional violence or sexual abuse?	yes
115.41 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
115.41 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess an inmate's risk level when warranted due to a referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a request?	yes
	Does the facility reassess an inmate's risk level when warranted due to an incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
115.41 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.41 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive	yes

	information is not exploited to the inmate's detriment by staff or other inmates?	
115.42 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.42 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each inmate?	yes
115.42 (c)	Use of screening information	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider, on a case-by-case basis, whether a placement would ensure the inmate's health and safety, and whether a placement would	yes

	present management or security problems?	
115.42 (d)	Use of screening information	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
115.42 (e)	Use of screening information	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.42 (f)	Use of screening information	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes
115.42 (g)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I inmates pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing	yes

	solely for the placement of LGBT or I inmates pursuant to a consent degree, legal settlement, or legal judgement.)	
115.43 (a)	Protective Custody	
	Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers?	yes
	If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment?	yes
115.43 (b)	Protective Custody	
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible?	yes
	Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible?	yes
	If the facility restricts any access to programs, privileges, education, or work opportunities, does the facility document the opportunities that have been limited? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the duration of the limitation? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
	If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document the reasons for such limitations? (N/A if the facility never restricts access to programs, privileges, education, or work opportunities.)	yes
115.43 (c)	Protective Custody	

	Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?	yes
	Does such an assignment not ordinarily exceed a period of 30 days?	yes
115.43 (d) Protective Custody		
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety?	yes
	If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged?	yes
115.43 (e) Protective Custody		
	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.51 (a) Inmate reporting		
	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.51 (b) Inmate reporting		
	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the inmate to remain	yes

	anonymous upon request?	
	Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? (N/A if the facility never houses inmates detained solely for civil immigration purposes.)	yes
115.51 (c)	Inmate reporting	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.51 (d)	Inmate reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
115.52 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.52 (b)	Exhaustion of administrative remedies	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.52 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from	yes

	this standard.)	
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.52 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency 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 does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	no
	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, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.52 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of inmates? (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.) (N/A if agency is exempt from this standard.)	yes
	If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)	yes
115.52 (f)	Exhaustion of administrative remedies	

	Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.52 (g)	Exhaustion of administrative remedies	
	If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.53 (a)	Inmate access to outside confidential support services	
	Does the facility 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?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers,	yes

	including toll-free hotline numbers where available of local, State, or national immigrant services agencies? (N/A if the facility never has persons detained solely for civil immigration purposes.)	
	Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible?	yes
115.53 (b)	Inmate access to outside confidential support services	
	Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.53 (c)	Inmate access to outside confidential support services	
	Does the agency 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?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.54 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate?	yes
115.61 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual	yes

	abuse or sexual harassment or retaliation?	
115.61 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.61 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.61 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.61 (e)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.62 (a)	Agency protection duties	
	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
115.63 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
115.63 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.63 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.63 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.64 (a)	Staff first responder duties	
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.64 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.65 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in	yes

	response to an incident of sexual abuse?	
115.66 (a)	Preservation of ability to protect inmates from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.67 (a)	Agency protection against retaliation	
	Has the agency established a policy 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?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.67 (b)	Agency protection against retaliation	
	Does the agency 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?	yes
115.67 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment 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?	yes
	Except in instances where the agency determines that a report of	yes

	sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.67 (d)	Agency protection against retaliation	
	In the case of inmates, does such monitoring also include periodic status checks?	yes
115.67 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.68 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
115.71 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations	yes

	of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
115.71 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
115.71 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.71 (d)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.71 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.71 (f)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes

	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.71 (g)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.71 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.71 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.71 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?	yes
115.71 (l)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).)	yes
115.72 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.73 (a)	Reporting to inmates	
	Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes

115.73 (b)	Reporting to inmates	
	If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.73 (c)	Reporting to inmates	
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.73 (d)	Reporting to inmates	
	Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following an inmate's allegation that he or she has been sexually	yes

	abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
115.73 (e)	Reporting to inmates	
	Does the agency document all such notifications or attempted notifications?	yes
115.76 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.76 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.76 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) 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?	yes
115.76 (d)	Disciplinary sanctions for staff	
	Are 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, reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Are 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, reported to: Relevant licensing bodies?	yes
115.77 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes

	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.77 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
115.78 (a)	Disciplinary sanctions for inmates	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.78 (b)	Disciplinary sanctions for inmates	
	Are sanctions 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?	yes
115.78 (c)	Disciplinary sanctions for inmates	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes
115.78 (d)	Disciplinary sanctions for inmates	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits?	yes
115.78 (e)	Disciplinary sanctions for inmates	
	Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.78 (f)	Disciplinary sanctions for inmates	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish	yes

	evidence sufficient to substantiate the allegation?	
115.78 (g)	Disciplinary sanctions for inmates	
	If the agency prohibits all sexual activity between inmates, does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)	yes
115.81 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison).	yes
115.81 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)	yes
115.81 (c)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a jail).	yes
115.81 (d)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.81 (e)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior	yes

	sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?	
115.82 (a)	Access to emergency medical and mental health services	
	Do inmate victims of sexual abuse 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?	yes
115.82 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.82 (c)	Access to emergency medical and mental health services	
	Are inmate victims of sexual abuse 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?	yes
115.82 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.83 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.83 (c)	Ongoing medical and mental health care for sexual abuse	

	victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.83 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if "all male" facility. Note: in "all male" facilities there may be inmates who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.83 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.83 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.83 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)	yes

115.86 (a)	Sexual abuse incident reviews	
	Does the facility 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?	yes
115.86 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.86 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.86 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.86 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.87 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.87 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.87 (c)	Data collection	
	Does the incident-based data 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?	yes
115.87 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.87 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	na
115.87 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.88 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant	yes

	to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	
115.88 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.88 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.88 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.89 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
115.89 (b)	Data storage, publication, and destruction	
	Does the agency 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?	yes
115.89 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.89 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403	Audit contents and findings	

(f)		
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes