

PREA Facility Audit Report: Final

Name of Facility: Joe Corley Processing Center

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 11/27/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input 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 type="checkbox"/>
Auditor Full Name as Signed: Bryan Pearson	Date of Signature: 11/27/2024

AUDITOR INFORMATION	
Auditor name:	Pearson, Bryan
Email:	bryan@pearsongroupllc.com
Start Date of On-Site Audit:	10/01/2024
End Date of On-Site Audit:	10/03/2024

FACILITY INFORMATION	
Facility name:	Joe Corley Processing Center
Facility physical address:	500 Hillbig Road, Conroe, Texas - 77301
Facility mailing address:	

Primary Contact

Name:	Bryan Uhls
Email Address:	buhls@geogroup.com
Telephone Number:	(936) 230-8764

Warden/Jail Administrator/Sheriff/Director	
Name:	Raymond Thompson
Email Address:	rathompson@geogroup.com
Telephone Number:	(936) 521-4000 ext.

Facility PREA Compliance Manager	
Name:	Bryan Uhls
Email Address:	BUhls@geogroup.com
Telephone Number:	(936) 521-4000

Facility Health Service Administrator On-site	
Name:	Jeremiah Granados
Email Address:	jeremiah.granados@geogroup.com
Telephone Number:	(936) 521-4000 ext.

Facility Characteristics	
Designed facility capacity:	1517
Current population of facility:	258
Average daily population for the past 12 months:	378
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both womens/girls and mens/boys

Which population(s) does the facility hold? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	19-74
Facility security levels/inmate custody levels:	USMS contract does not use custody levels
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	275
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:	7

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:	Brian Evans
--------------	-------------

Email Address:	bevans@geogroup.com
Telephone Number:	5618930101

Agency-Wide PREA Coordinator Information			
Name:	Manuel Alvarez	Email Address:	Manuel.Alvarez@geogroup.com

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:

5	<ul style="list-style-type: none"> • 115.13 - Supervision and monitoring • 115.31 - Employee training • 115.73 - Reporting to inmates • 115.82 - Access to emergency medical and mental health services • 115.86 - Sexual abuse incident reviews
---	---

Number of standards met:

40

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:	2024-10-01
2. End date of the onsite portion of the audit:	2024-10-03

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:	A test Call was made from the detainee phones to the Montgomery County Women's Center. This auditor spoke to a staff at the MCWC and verified the organization has agreed to provide victim advocate service to detainees at JCPC.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	1517
15. Average daily population for the past 12 months:	378
16. Number of inmate/resident/detainee housing units:	80
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

18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	281
19. 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:	3
20. 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
21. 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:	0
22. 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:	0
23. 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:	88
24. 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:	4

<p>25. 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>26. 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>9</p>
<p>27. 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>7</p>
<p>28. 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>29. 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>30. 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>269</p>
<p>31. 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>7</p>

<p>32. 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>33. 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>34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>13</p>
<p>35. 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 type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p>
<p>36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The facility has both male and female detainees. A random sample was selected that was based on a numerical factor on the list of US Marshal detainees and that represented both male and female detainees.</p>

37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
38. 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):	<p>JCPC has both US Marshal Services detainees and ICE detainees in the population. These populations are separated in the facility. Interviews were only conducted with the USMS detainees as this is a DOJ PREA audit. ICE detainees fall under the DHS PREA standards and were not part of this audit.</p>
Targeted Inmate/Resident/Detainee Interviews	
39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	13
<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>	
40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
40. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p>40. 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 PREA Compliance Manager verified there were none with the Case Manager that completes intake assessments.</p>
<p>41. 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:</p>	<p>0</p>
<p>41. 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>41. 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 PREA Compliance Manager verified there were none with the Case Manager that completes intake assessments.</p>
<p>42. 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:</p>	<p>0</p>

<p>42. 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>42. 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 PREA Compliance Manager verified there were none with the Case Manager that completes intake assessments.</p>
<p>43. 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:</p>	<p>0</p>
<p>43. 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>43. 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 PREA Compliance Manager verified there were none with the Case Manager that completes intake assessments.</p>
<p>44. 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:</p>	<p>5</p>

<p>45. 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:</p>	<p>4</p>
<p>46. 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:</p>	<p>1</p>
<p>47. 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:</p>	<p>3</p>
<p>48. 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:</p>	<p>5</p>
<p>49. 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>49. 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>49. 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 PREA Compliance Manager verified there were none with the Case Manager that completes intake assessments.</p>
<p>50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>51. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>
<p>52. 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 <input checked="" type="checkbox"/> Shift assignment <input type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None </p>
<p>53. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p>
<p>54. 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>

Specialized Staff, Volunteers, and Contractor Interviews

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.

55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	9
56. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
58. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
59. 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)

60. 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
61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
61. Enter the total number of VOLUNTEERS who were interviewed:	1
61. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
62. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
62. Enter the total number of CONTRACTORS who were interviewed:	1
62. 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 type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other
63. 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.

64. 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:	
65. 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
66. 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
67. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
68. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p>69. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>JCPC has two populations, ICE detainees and US Marshal Service detainees. As a result, the tour was limited to the areas that US Marshals Service detainees had access to. ICE detainee housing units and the food service production kitchen was not toured. These were areas that USMS detainees were not allowed to be in separately. There were areas that detainees from both populations can go to that were toured (medical, intake, library). There were 36 housing units/pods being used to house USMS detainees.</p>
--	---

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.

<p>70. 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?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
--	---

<p>71. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>Lists were requested for detainees to select for document review (risk assessment and PREA Education). Lists for staff hired in the last 12 months, contract staff, veteran staff and volunteers were requested random selection for document review (criminal background, employment background, PREA training, specialized training, search training)</p>
---	--

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.

72. 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	4	0	4	0
Staff-on-inmate sexual abuse	1	0	1	0
Total	5	0	5	0

73. 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	7	0	7	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	7	0	7	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.

74. 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	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	3	0	1	0
Staff-on-inmate sexual abuse	1	0	0	0
Total	4	0	1	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.

76. 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	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	3	0	0	4
Staff-on-inmate sexual harassment	0	0	0	0
Total	3	0	0	4

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

78. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	1
--	---

<p>79. 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>80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>81. Did your sample of INMATE-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 inmate-on-inmate sexual abuse investigation files)</p>
<p>82. 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>83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" 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>86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>5</p>
<p>87. Did your selection of SEXUAL HARASSMENT 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 harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>
<p>89. 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>90. 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	
91. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	1
92. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
93. 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)
94. 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	
95. 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

96. 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

97. 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: Meets Standard
	Auditor Discussion
	<p>a) The Joe Corley Processing Center provided a policy 1400.03 Sexually Abusive Behavior Prevention and Intervention Program (PREA) for review that provides a zero-tolerance policy and outlines the facility’s plan for preventing, detecting, and responding to sexual abuse and sexual harassment. The policy states on page 6, “JPCPC maintains zero-tolerance towards all forms of sexual abuse and assault and this policy outlines JPCPC’s approach to preventing, detecting, and responding to such conduct.” The policy provides definitions for sexual abuse and sexual harassment against detainee victims by another detainee, staff, contract staff, and volunteers.</p> <p>JPCPC policy 1400.04 Investigating Allegations of Sexual Abuse and Assault and Evidence Collection page 12 provides the detainee disciplinary sanctions</p> <p>b) GEO policy 5.1.2-A PREA page 2 requires GEO to designate a PREA Coordinator, at the corporate level with the time and authority to develop, implement, and oversee GEO’s efforts to comply with the PREA standards in all facilities. A review of the GEO PREA webpage at https://www.geogroup.com/prea</p>

	<p>found the information for the GEO PREA Coordinator in a Director position.</p> <p>GEO Organization Chart - The GEO organizational chart shows the GEO PREA Coordinator reporting directly to a Vice President of Contract Compliance</p> <p>PREA Coordinator Interview - The GEO PREA Coordinator said he has the time and authority to manage the PREA compliance in GEO facilities. He has staff assigned to him regionally that assist with those duties. GEO has a PREA Compliance Manager at all GEO facilities. He had quarterly training sessions with the PCM's through virtual communications and individual communications about investigation or audit issues. If he identifies a compliance issue, he will work with the facility on a corrective action plan. If it is a policy issue, he will work with executive staff on a policy revision.</p> <p>c) GEO policy 5.1.2-A PREA page 3 requires each facility to appoint a local PREA Compliance Manager with the time and authority to coordinate the facility's efforts to comply with the PREA standards.</p> <p>JCPC Organization Chart - The facility provided the JCPC organization chart that documents the PREA Compliance Manager having direct report and communication with the Warden.</p> <p>PCM Interview - Two staff were interviewed for the PREA Compliance Manager. One staff has been the PCM and the other staff is the new PCM. Both said they had the time to complete all their PCM responsibilities.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.</p>
--	--

115.12	Contracting with other entities for the confinement of inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	GEO JCPC has been contracted to hold detainees for the US Marshall Service. The facility provided the contract for review. The contract has a Prison Rape Elimination Act clause that requires to abide by all relevant PREA regulations. GEO JCPC is not a public agency and does not contract with other entities to house its detainees.

115.13	Supervision and monitoring
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	a, c) GEO policy 5.1.2-A PREA page 3 states "Each facility shall develop and

document a staffing plan that provides adequate staffing levels and, where applicable, video monitoring to protect individuals in a GEO facility against sexual abuse.” JCPC policy 1400.04 page 9 states JCPC will maintain sufficient supervision of detainees through appropriate staffing levels and video monitoring, to protect detainees against sexual abuse.

The facility provided a 2023 Annual PREA Facility Assessment that is a review of the staffing plan. The staffing was documented on a Staff and Contractor Roster that shows all employee and contractor positions with title. The annual review of staffing and video monitoring considered the eleven factors from provision (a) of the standard, staffing plan deviations, and staffing on each shift. The annual staffing plan assessment was conducted by the HSA, DON, PREA Compliance Manager, and Assistant Warden. The staffing assessment is sent to the Regional Director of Operations and GEO PREA Coordinator for review.

Tour Observations – The tour of the facility was completed on the first day of the onsite audit. All areas of the facility were visited in the tour that Marshal’s detainees had access to. The areas that only ICE detainees had access to were not reviewed as part of this DOJ audit. This auditor visited the Marshal’s three male segregation units, twenty-six male pods, one female segregation unit, six female pods, medical unit, mental health offices, intake area, recreation areas, visitation, maintenance, warehouse, laundry, commissary, and library. The food service area was not toured as no Marshal’s detainees were allowed in that area. Only ICE detainees worked in the kitchen. There was no dining hall. All meals are served on the housing units. The housing units had a window view into them from the hall between them. The pods are small with only 12 detainees in some. Staff were observed doing rounds and monitoring detainees in areas they were present in. Cameras were observed in all areas and there were blind spots found that needed to be addressed.

Warden Interview – The Warden said the staffing plan is reviewed regularly with HR and annually. The staffing plan focuses on mandatory posts for proper supervision of the detainee population in all areas of the facility. The contract with the client guides the staffing plan for the facility. The frequency and type of PREA incidents are taken into consideration to determine if there is a need for a change in or addition to staff coverage of an area. Changes to the staffing plan would have to be requested through US Marshals and GEO corporate.

PCM Interview - The PREA Compliance Manager stated the staffing levels and vacancies are reviewed on a weekly basis in addition to the required annual staffing plan review. The review is documented on the Annual PREA Facility Assessment and forwarded to the Warden for review and signature.

b) JCPC policy 1400.04 page 9 requires JCPC to document the circumstances where the staffing plan is not complied with. The facility reported on the Pre-Audit Questionnaire there were no deviations from the staffing plan in the last year.

Warden Interview – The Warden said any deviations from the staffing plan would be documented on the shift report. He monitors the shift report daily and would be notified if there was a mandatory post that could not be filled.

	<p>d) JCPC policy 1400.04 page 10 requires all Shift Supervisors to conduct weekly-unannounced PREA rounds on their shift to all housing areas to include RHU and work areas of the facility, documenting unannounced PREA rounds in the security logbooks with red ink on the “Supervisors PREA Round” form. Unannounced PREA rounds are required to cover all shifts, day and night, during the week to deter sexual abuse of detainees. The policy prohibits staff from notifying other staff the rounds are being conducted.</p> <p>Document Review – The Shift Supervisor Unannounced PREA logs were reviewed during the tour of the facility. Copies of the logs were requested for each housing area for three consecutive days in the months of April, May and June of 2024. The logs were provided and showed supervisors made unannounced rounds in all housing areas on each shift all three days. This was documented on a page for the month that had a line for each day with the two shifts represented. The logs for all three months shift supervisor rounds almost every day on every shift. The Standards in Focus suggests a best practice is supervisor rounds once per week in each unit on every shift. The documentation provided shows JCPC exceeding the standard.</p> <p>Intermediate Supervisor Interview – A Captain that is a Shift Supervisor said when conducting unannounced rounds, he meets with the Correctional Officers in the housing units. The rounds are documented by signing in a log for unannounced rounds. He is required to visit all housing units on a shift. He prevents staff from alerting other staff of the rounds being conducted by using a different route each time and doing the rounds at different times each day.</p> <p>Staff Interviews – All random staff interviewed said they see a shift supervisor at least once per shift in their housing unit conducting unannounced rounds almost every day.</p> <p>Detainee Interviews – Detainees interviewed were asked if they see staff conducting rounds in their unit. Most said they see staff every half hour doing rounds. Most said they see the shift supervisor visiting the unit at least once per day on each shift.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility exceeds the standard.</p>
--	--

115.14	Youthful inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	JCPC reported on the Pre-Audit Questionnaire that JCPC does not house youthful inmates. A report of all detainee arrivals with dates of birth was provided that had no detainees under 18. There were no detainees interviewed that were under 18.

115.15	Limits to cross-gender viewing and searches
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 264 544 297">Auditor Discussion</p> <p data-bbox="256 340 1465 539">a) JPCPC policy 1400.04 page 21 states cross-gender visual body cavity searches (meaning a search of the anal or genital opening) are prohibited except in exigent circumstances and shall only be performed by offsite medical practitioners. Cross-gender strip searches shall not be conducted except in exigent circumstances, including consideration of officer safety, or when performed by medical practitioners.</p> <p data-bbox="256 577 1430 651">JPCPC reported zero cross-gender strip or visual body cavity searches in the past 12 months.</p> <p data-bbox="256 689 1437 763">Staff Interviews- Random Staff interviewed were asked if they had training in cross-gender and transgender searches. All reported being trained in these searches.</p> <p data-bbox="256 801 1453 965">Detainee Interviews - twenty-six detainees were interviewed, twelve female and sixteen male. All twelve female detainees said they have never been strip searched or pat searched by a male staff. All sixteen male detainees said they have never been strip searched or pat searched by a male staff.</p> <p data-bbox="256 1003 1430 1167">Document Review - Search training records were reviewed for twenty-two security staff. All had a record of search training completion. New staff completed the training soon after being hired in the pre-service training and veteran staff had completed the annual search training during this year.</p> <p data-bbox="256 1205 1445 1323">b) JPCPC policy 1400.04 page 20 states cross-gender pat-down searches of detainees shall not be conducted unless staff of the same gender is not available at the time the pat-down search is required in exigent circumstances.</p> <p data-bbox="256 1361 1445 1480">c) GEO policy 5.1.2-A PREA page 12 requires staff to document and justify all cross-gender pat searches of female detainees, cross-gender strip and cross gender visual body cavity searches.</p> <p data-bbox="256 1518 1477 1749">d) JPCPC policy 1400.04 page 21 Detainees shall be permitted to shower, change clothes, and perform bodily functions without employees of the opposite gender viewing them, absent exigent circumstances, or instances when the viewing is incidental to routine cell checks. Staff are required to announce their presence when entering an opposite gender housing unit or an area where detained are likely to be in a state of undress.</p> <p data-bbox="256 1794 1469 1951">Staff Interviews - All staff interviewed were aware of the requirement to announce their presence when entering a housing unit/pod or if going into a dedicated detainee bathroom. All staff said they here opposite gender announcements in both male and female housing units.</p> <p data-bbox="256 1995 1461 2069">Detainee Interviews - All detainees said they can shower and use the toilets without opposite gender staff seeing them in a state of undress. Most detainees interviewed</p>

said they hear opposite gender staff making announcements coming into the housing units.

Tour Observation – During the tour opposite gender announcements were made when entering housing unit. There were male and female staff on the tour group requiring the announcements to be made going into all the housing units. Open dorms had individual shower stalls and toilet stalls with a shower curtain that provided a modesty screen without preventing monitoring by staff. Cells had a toilet and shower in the cell. The solid door had a small vertical window. Some of the windows had an obscuring film on the lower half of the window to block the view of the toilet and shower stall that had no curtain. Some cells did not have the film. This would allow opposite gender staff walking in the unit to see a detainee on the toilet or in the shower exposing a view of their genitals or buttocks. The facility was required to place a film on the cells without film to prevent the opposite gender viewing.

Corrective Action Completed: The facility placed film on the lower half of the windows in cells that did not have it. Pictures were taken and provided for review. The film appeared the same as the cells that did have the film during the tour.

e) GEO policy 5.1.2-A PREA page 13 states “Facilities shall not search or physically examine a transgender or intersex individual in a GEO facility solely to determine their genital status. If the genital status is unknown, it may be determined during private conversations with the individual, 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.”

Staff Interviews – Staff said they are prohibited from searching a transgender detainee only for determining their genital status.

Transgender Detainee Interview – A transgender detainee said searches were not conducted only for determining their genital status.

f) JCPC policy 1400.04 page 21 states security staff will be trained to conduct pat-down searches, including cross-gender pat-down searches and searches of transgender and intersex detainees in a professional and respectful manner, and in the least intrusive manner possible, including consideration of officer safety. Staff should ensure transgender detainees are searched in private.

Staff Interviews- Random Staff interviewed were asked if they had training in cross-gender and transgender searches. All reported being trained in these searches.

Detainee Interviews – Detainees said they had not been subjected to any cross-gender pat searches. A transgender detainee said she can choose female staff for pat searches and the searches have not been too invasive.

Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.

115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>a) JCPC policy 1400.04 page 15 requires the facility to provide a detainee with disabilities (e.g., those who are hard of hearing, blind, have low vision, intellectual, psychiatric, or speech disabilities) an equal opportunity to participate in or benefit from the facility efforts to prevent, detect, and respond to sexual abuse/assault and sexual harassment. Written materials are to be provided to every detainee in formats or through methods that ensure effective communication with detainee with disabilities, including those who have intellectual disabilities, limited reading skills, or who are blind or have limited vision.</p> <p>Tour Observations - Posters with information about reporting sexual abuse and sexual harassment and victim advocate services were observed in detainee housing units, program areas, service areas and administration areas. The posters were placed on the outside of the window to their housing unit at a height that detainees could easily see. The postings were in English and Spanish. PREA information is placed on the detainee tablets that can be switched to be in Spanish. The PREA reporting hotline phone number was spray painted on the wall just above the phone in English and Spanish. A large print version of the reporting information was posted. A written version of the comprehensive PREA Education script can be given to hearing impaired detainees to read.</p> <p>Intake Staff Interview - Staff that conduct intake orientation with newly arriving detainees said he asks detainees if they need accommodation for reading, hearing, visual impairment or language. He described the following accommodations for detainees with disabilities: the video shown has closed captioning for hearing impaired, the information is read and explained for detainees that cannot read or are visually impaired and mental health staff would assist detainees with cognitive disabilities or mental health issues.</p> <p>b) JCPC policy 1400.04 page 15 requires the facility to provide methods to ensure effective communication shall include, when necessary, access to in-person, telephonic, or video interpretive services that enable effective, accurate, and impartial interpretation.</p> <p>Intake Staff Interview - Staff that conduct intake orientation with newly arriving detainees said if a detainee is limited English proficient, the facility has staff that are fluent speaking Spanish. He said there is a contract for telephonic interpreter services they can use for other languages or when those staff are not available.</p> <p>Random Staff Interviews - all staff were aware there were staff that could provide Spanish interpretive services and there is a telephonic service the shift supervisor has the information to access when needed.</p>

	<p>Detainee Interview – Four detainees that were designated as Limited English Proficient were interviewed using a staff interpreter. All four said the staff they talk to at intake could speak Spanish and provided them with the PREA information and asked questions on the assessment.</p> <p>c) JPCPC policy 1400.04 page 15 prohibits the use of detainee interpreters, readers, or other types of assistants except in limited circumstances where an extended delay in obtaining an interpreter could compromise the detainee's safety, the performance of first responders or the investigation of the allegation.</p> <p>Random Staff Interview – All staff said they are not allowed to use another detainee that is bilingual to be an interpreter for a detainee that was LEP to report an incident of sexual abuse.</p> <p>Based on the information from the policies and documents reviewed, interviews and observations during the facility tour, the facility meets the provisions of this standard.</p>
--	--

115.17	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>a) JPCPC policy 1400.03 page 10 and page 20 states JPCPC is prohibited from hiring or promoting or contracting anyone (who will have direct contact with a detainee) who has engaged in sexual abuse in a prison, jail, holding facility, community confinement facility, juvenile facility or other institution who has been convicted of engaging in sexual activity 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 who has been civilly or administratively adjudicated to have engaged in such activity. GEO policy 5.1.2-A PREA page 4 and page 11 has the same requirements.</p> <p>Document Review - Ten staff hired in the last 12 months were randomly selected for file review. All ten were asked the required questions about prior sexual abuse and sexual harassment on the GEO Employment Questionnaire form prior to their hire.</p> <p>HR Staff Interview – The HR staff said the GEO Employment Questionnaire form is completed by the applicant along with the application.</p> <p>b) JPCPC policy 1400.03 page 10 states JPCPC must consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with detainees.</p> <p>HR Interview – The Human Resources staff was asked if incidents of sexual harassment were considered in deciding to hire or promote staff or allow contract staff to provide services at the facility. She said all staff new hires or promotions are asked on the GEO Employment Questionnaire form if a substantiated allegation of</p>

sexual harassment has been made against them.

c) JCPC policy 1400.03 page 10 requires JCPC HR staff to conduct a background investigation that includes a criminal background check and contact prior institutional employers to inquire about substantiated sexual abuse investigations or resignation during the investigation.

HR Staff Interview – HR staff said she has a criminal background check conducted on all staff hired prior to starting work at the facility. A contract company completes the employment background check. She said they make three attempts to contact the prior employer and documents the results or no answer.

Document Review - Ten staff hired in the last 12 months were randomly selected for file review. A criminal background check was completed on all ten staff prior to their start date. An employment background check was conducted on eight by a contract company that contacts the prior institutional employers. The company documents when an answer is received about prior substantiated sexual abuse or that no answer was received.

d) JCPC policy 1400.03 page 20 requires JCPC Human Resources staff to conduct a background investigation, including a criminal background check.

HR Staff Interview – HR staff said she has a criminal background check conducted on all new contract staff prior to starting work at the facility.

e) JCPC policy 1400.03 and GEO policy 5.1.2-A PREA require a criminal background check for staff and contractors every five years.

HR Staff Interview – HR staff said she completes a new criminal background check on current staff and contract staff every 5 years. She completes the checks in the month prior to the month of their start date.

Document Review – Criminal background checks were reviewed for twelve veteran staff that had been employed for more than five years and four veteran contract staff. All criminal background checks were less than five years old and completed during the review period.

f) JCPC policy 1400.03 page 11 requires JCPC HR staff to ask current employees about previous sexual misconduct during annual performance reviews and imposes a continuing affirmative duty to disclose any sexual misconduct.

HR Staff Interview - HR staff said current employees complete the PREA Disclosure and Authorization form at the annual employee evaluation. She said the form asks the questions again and informs the employee of the duty to disclose.

Document Review - PREA Disclosure and Authorization forms were provided for eleven veteran staff that were signed within the last year. The form asked questions pertaining to provision (a) and informed the staff of the duty to disclose such conduct.

g) JCPC policy 1400.03 page 11 states “Material omissions regarding such misconduct or the provision of materially false information shall be grounds for termination or withdrawal of an offer of employment as appropriate.”

h) JCPC policy 1400.03 page 11 requires JCPC to provide information on substantiated investigations of sexual abuse for former staff that have applied for employment with another institutional employer if requested.

HR Staff Interview – HR staff said she entered information about substantiated sexual abuse investigations and resignations during an investigation in the system. Inquiries from other institutional employers go to corporate and are answered.

Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.

115.18

a) JCPC policy 1400.03 page 11 requires JCPC to consider the effect of any (new or upgraded) design, acquisition, substantial expansion, or mortification of the physical plant might have on the facility’s ability to protect detainees from sexual abuse.

The facility reported on the Pre-Audit Questionnaire there have been no expansions or modifications of the facility since the last PREA audit.

Warden Interview – The Warden said the facility has not experienced any expansion or modification in the last three years. He said the PREA Compliance Manager would be involved in planning to review for PREA standards compliance.

b) JCPC policy 1400.03 page 11 requires JCPC to consider the effect an (new or upgraded) video monitoring system, electronic surveillance system or other monitoring system might have on the facility’s ability to protect detainees from sexual abuse.

Warden Interview – The warden said the facility upgraded the video monitoring system to allow for a longer recording time. He said the PREA Compliance Manager was involved in the planning for the video monitoring system upgrade to ensure the upgrade would improve PREA standards compliance.

Document Review – the facility provided the receipt for equipment purchase to upgrade the video monitoring system.

PCM Interview – The PCM said he was directly involved in the video monitoring system upgrade. The upgrade improved their ability to monitor inmates and review for investigation in response to allegations.

Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.

115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JCPC policy 1400.03 page 11 requires JCPC to consider the effect of any (new or upgraded) design, acquisition, substantial expansion, or mortification of the physical plant might have on the facility's ability to protect detainees from sexual abuse.</p> <p>The facility reported on the Pre-Audit Questionnaire there have been no expansions or modifications of the facility since the last PREA audit.</p> <p>Warden Interview - The Warden said the facility has not experienced any expansion or modification in the last three years. He said the PREA Compliance Manager would be involved in planning to review for PREA standards compliance.</p> <p>b) JCPC policy 1400.03 page 11 requires JCPC to consider the effect an (new or upgraded) video monitoring system, electronic surveillance system or other monitoring system might have on the facility's ability to protect detainees from sexual abuse.</p> <p>Warden Interview - The warden said the facility upgraded the video monitoring system to allow for a longer recording time. He said the PREA Compliance Manager was involved in the planning for the video monitoring system upgrade to ensure the upgrade would improve PREA standards compliance.</p> <p>Document Review - the facility provided the receipt for equipment purchase to upgrade the video monitoring system.</p> <p>PCM Interview - The PCM said he was directly involved in the video monitoring system upgrade. The upgrade improved their ability to monitor inmates and review for investigation in response to allegations.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.</p>

115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JCPC policy 1400.04 Investigating Allegations of Sexual Abuse page 6 states JCPC is responsible for investigating allegations of sexual abuse is required to follow uniform evidence protocols that maximize the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.</p>

The facility reported zero detainees being provided with a forensic examination during the last 12 months. There were no completed investigations reviewed that required a forensic examination in the last 12 months.

b) JPCPC policy 1400.04 Investigating Allegations of Sexual Abuse page 6 states “The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be 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.”

c) JPCPC policy 1400.04 Investigating Allegations of Sexual Abuse page 6 states “JPCPC shall offer detainees who experience sexual abuse, access to forensic medical examinations (whether on-site or at an outside facility) with the victim’s consent and without cost to the individual and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.”

PCM Interview – The PCM said detainees would be taken to Houston Healthcare Conroe for a forensic examination.

d) JPCPC policy 1400.04 Investigating Allegations of Sexual Abuse page 6 requires JPCPC to offer or make available a victim advocate to accompany the victim through examinations and investigatory interviews.

e) JPCPC policy 1400.04 Investigating Allegations of Sexual Abuse page 7 states “Upon request by the victim and with the victim’s consent either in writing or on audio tape, the victim advocate may participate in supporting the victim throughout the forensic medical examination process (ensuring compliance with confidentiality laws) and investigatory interviews and shall provide emotional support, crisis intervention, information and referrals.”

f) JPCPC provided an MOU in the Pre-Audit Questionnaire with the Montgomery County Sheriff’s Department for criminal investigations. Since then, the US Marshals have taken over all criminal investigations for JSPC according to the PCM. The JPCPC has a contract with the US Marshals Service for holding their detainees at JPCPC. The JPCPC Warden was asked to inform the US Marshals Investigator for JPCPC of the evidence requirements for 115.21 in a letter. The letter covered the evidence requirements in provisions (a) (b) (c) (d) (e) of the standard.

h) Document Review – A memorandum of understanding between Family Time Crisis Center, a community-based counseling center, and JPCPC was provided for review. The MOU establishes a 24-hour 7 day a week hotline for detainees to request support services. The FTCC agrees to provide follow-up care detainees that have been subject to abuse. The MOU was signed by both parties in July 2023 and will terminate at the request of one or both parties.

Tour Observations – posters in English and Spanish were observed in the housing units that provided mailing addresses and phone numbers for four local victim

	<p>advocate organizations. A speed dial number on the detainee phone system was provided for the Montgomery County Women’s Center. A test call was made to the number by this auditor. A person answered and verified she was with the Montgomery County Women’s Center. She said the detainees could call the hotline to report sexual abuse or request victim advocate services. Information for MCWC was also found on page 7 of the detainee handbook.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.</p>
--	---

115.22	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>a) JPCP policy 1400.04 Investigating Allegations of Sexual Abuse page 3 requires an administrative investigation to be completed for all allegations of sexual abuse and sexual harassment.</p> <p>Agency Head Interview - The Executive VP said all allegations of sexual abuse and sexual harassment are investigated either by facility investigators for administrative or local law enforcement for criminal. He said GEO uses local law enforcement based on the client’s contract requirements. Facility investigators are required to complete a PREA Specialized Investigation training for them to be qualified.</p> <p>The facility reported thirteen allegations were referred for administrative investigations and four referred for criminal investigations. The facility provided six completed administrative investigations for review. Five were for allegations of sexual harassment and one sexual abuse allegation.</p> <p>b) JPCP policy 1400.04 Investigating Allegations of Sexual Abuse page 4 requires allegations of sexual abuse that involve potentially criminal behavior to be referred to outside law enforcement agencies.</p> <p>Investigator Interview - The Facility Investigator said all reports of alleged sexual abuse are referred to the US Marshals for review. If it appears a criminal violation has occurred, the USMS investigates further. If there is no criminal violation, they notify him to proceed with an administrative investigation.</p> <p>A review of the GEO PREA webpage at https://www.geogroup.com/prea found a link to open GEO policy 5.1.2-E PREA Investigations Policy on the page.</p> <p>c) JPCP policy 1400.04 Investigating Allegations of Sexual Abuse page 4 states when an outside agency conducts a criminal investigation, the facility will request that the outside agency follow evidence protocols in section D that are the same as the protocols in 115.21. The policy provides information about the role of the outside</p>

	<p>agency and the facility investigator. Most GEO facilities rely on an outside law enforcement agency to conduct criminal investigations.</p> <p>There were no criminal investigations completed by the US Marshals during the last 12 months. A PREA Incidents tracking log provided shows seven ongoing investigations. The US Marshals were contacted in four of those pending cases and declined to investigate.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.</p>
--	--

115.31	Employee training
	Auditor Overall Determination: Exceeds Standard
	<p>Auditor Discussion</p> <p>a) JPCPC policy 1400.03 page 17 states “All employee shall receive training on GEO’ Sexually Abusive Behavior Prevention and Intervention Program. The policy requires the staff to receive training in the 10 topics in provision (a).</p> <p>Document Review – the Sexual Abuse and Assault Prevention & Intervention (PREA) training curriculum was reviewed. This auditor found the training to cover the ten required topics in provision (a) that include the zero-tolerance policy, signs of sexual abuse, dynamics of sexual abuse, communication with LGBTI inmates, staff responsibilities, mandatory reporting laws, reactions of victims, avoiding inappropriate relationships, and inmate and staff rights. Training records for ten staff hired during the last twelve months were requested for review. All ten had completed the PREA training during the pre-service training shortly after being hired.</p> <p>Staff Interview – Twelve randomly selected staff were interviewed. All staff could describe the information provided to them that covered the ten topics required by the provision in the standard.</p> <p>b) JPCPC policy 1400.03 page 17 states “Employee training shall be tailored to the gender of the detainees at JPCPC, and employees shall receive additional training if transferring between facilities that house individuals of different genders.” JPCPC has both male and female detainee populations. The training curriculum covered information specific to both genders pertaining to searches and announcements.</p> <p>c) JPCPC policy 1400.03 page 17 states “PREA/SAPPI refresher training shall be conducted each year thereafter for all employees.”</p> <p>Staff Interviews – Staff said they complete the PREA training annually.</p> <p>d) JPCPC policy 1400.03 page 17 requires staff to sign the PREA Basic Training Acknowledgement form when they complete the training.</p>

	<p>Document Review - Twelve veteran staff were selected for PREA training document review. All twelve completed the PREA training less than a year prior to the onsite audit.</p> <p>Based on the information from interviews, policies and documents reviewed, this auditor finds the facility exceeds the provisions of the standard by requiring staff to complete the training annually.</p>
--	--

115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-b) JCPC policy 1400.03 page 18-19 requires contract staff and volunteers to complete the GEO's Sexually Abusive Behavior Prevention and Intervention Program before working or volunteering in the facility. The training curriculum is the same used for training the staff. The training covers contract staff and volunteer responsibilities for prevention, detection and response to allegations of sexual abuse and sexual harassment, the agency zero-tolerance policy. The training is required to be completed annually.</p> <p>c) JCPC policy 1400.03 page 18-19 requires Contractors and volunteers to sign the PREA Basic Training Acknowledgement form indicating they received and understand the training.</p> <p>Document Review - Documentation of PREA training completion was requested and reviewed for four contract staff and seven volunteers. All contract staff and volunteers selected for review have completed the required training.</p> <p>Contractor Interview - A commissary contract staff said he completes the training annually. He said the training covered the zero-tolerance policy, requires contract staff to report all knowledge or suspicion of retaliation, sexual abuse or sexual harassment. If he receives a report, he is required to notify the shift supervisor immediately. Separate the inmate from other inmates or staff involved and instruct them not to destroy evidence.</p> <p>Volunteer Interview - A volunteer said she completed the PREA training annually. The training covers the zero-tolerance policy and what she must do in response to a report of sexual abuse or sexual harassment. She is required to report all knowledge or suspicion of an incident of sexual abuse or sexual harassment to the shift supervisor immediately.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.</p>

115.33

Inmate education

Auditor Overall Determination: Meets Standard

Auditor Discussion

a-b) JPCPC policy 1400.03 page 16 requires the PREA education to be provided to detainees during the intake process. The education covers detainee rights, zero-tolerance policy, and how to report sexual abuse and sexual harassment.

Intake Staff Interview - The staff that provide the PREA orientation/education to detainees at arrival to JPCPC said the detainees are provided the PREA brochure as the initial information about reporting sexual abuse and harassment. The comprehensive information is provided through the PREA video and staff explaining the brochure information, victim services and the different ways to report an incident of sexual abuse or sexual harassment at JPCPC. The staff said he tries to identify any needs for accommodation at the individual meeting. This is the same meeting he uses to complete the risk screening. The video is closed captioned for hearing impaired. He explains the information and makes sure they understand it if they cannot read, have visual or cognitive disabilities.

Detainee Interview - Twenty-six detainees were interviewed. Most recalled being provided information about reporting sexual abuse or sexual harassment and zero-tolerance policy on the first day at the facility. All detainees interviewed said they see posters about PREA in the housing units and other areas. They all knew there was a phone number on the posters to call for reporting. All detainees knew at least two or more methods of reporting sexual abuse or sexual harassment. Some knew there was an outside organization that is not part of the JPCPC they can report to. All detainees knew they could make a report using their tablet to call the hotline, file a grievance or send a "kite" to staff.

Document Review - PREA education completion records were reviewed for twenty-six detainees. All had signed a PREA Comprehensive Education Acknowledgement form that indicates the detainee received the PREA Comprehensive Education that included information about rights to be free from retaliation, sexual abuse and sexual harassment, and procedures for reporting incidents. All detainees received education on the day of arrival.

Tour Observation - An individual PREA education was observed during the onsite audit. The Case Manager explained the information about zero-tolerance policy, rights of detainees to be free of sexual abuse or retaliation, the different ways the detainee can report after showing the video. Signs were observed throughout the detainee housing units, recreation areas, medical waiting area, and hallways that provide detainees with reporting information and the zero-tolerance policy.

d) JPCPC policy 1400.03 page 16 states "The education shall be provided in formats accessible to all detainees, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to detainees who have limited reading skills."

	<p>e) JCPC policy 1400.03 page 16 states “Documentation of detainee participation in the intake process orientation shall be retained in their individual files.”</p> <p>f) In addition to providing such education, JCPC will ensure that key information is continuously and readily available or visible to detainees through posters, detainee handbooks, tablets, or other written formats.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of this standard.</p>
--	--

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JCPC policy 1400.03 page 18 requires facility investigators to receive the specialized training in addition to the training required in 115.31.</p> <p>b) JCPC policy 1400.03 page 16 states “Investigators who conduct investigations into allegations of sexual abuse at JCPC shall be trained in conducting investigations into sexual abuse and effective cross-agency coordination. All investigations into alleged sexual abuse must be conducted by qualified investigators. The specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>Curriculum Review – The training curriculum used by GEO is the PREA Specialized Training: Investigating Sexual Abuse in the Correctional Setting provided by the PREA resource Center. The curriculum was reviewed and found to cover interview techniques, Miranda and Garrity warnings, evidence collection, and criteria and evidence required to substantiate an administrative case or a criminal case.</p> <p>Investigator Interview – The designated facility investigator was interviewed and said he has completed the specialized investigator training from the PRC training curriculum.</p> <p>c) The facility provided completion certificates for the PREA Specialized Training: Investigating Sexual Abuse in the Correctional Setting for the two staff designated to conduct investigations. The PREA training completion documents were also provided for both staff for 115.31.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of this standard.</p>

115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	<p data-bbox="256 264 544 297">Auditor Discussion</p> <p data-bbox="256 338 1477 622">a) JPCPC policy 1400.03 page 16 states “JPCPC shall train all full-time and part-time medical and mental health care practitioners who work in the facility or who have any contact with detainees (by phone or via web applications such as tele-psych), on specific topic areas, including detecting and assessing signs of sexual abuse and sexual harassment, preserving physical evidence of sexual abuse, responding effectively and professionally to victims of sexual abuse and sexual harassment, and proper reporting of allegations or suspicions of sexual abuse and sexual harassment.”</p> <p data-bbox="256 663 1469 864">Mental Health Staff Interview – The mental health staff said she receives specialized medical training through Centurian annually and has completed the PREA training for contract staff. The training has a trauma informed approach. The training covered protection of evidence, signs of sexual abuse, communication with victims, and reporting sexual abuse and sexual harassment.</p> <p data-bbox="256 904 1461 1106">Medical Staff Interview – The medical staff interviewed said she has completed specialized medical training. She said all medical staff complete annual PREA training. The specialized medical training covers how to detect and assess signs of sexual abuse and sexual harassment, what medical staff can do to preserve physical evidence, responding to victims, and who to report allegations or suspicions to.</p> <p data-bbox="256 1146 1445 1431">Training Curriculum Review – The GEO Specialized Medical and Mental Health PREA Training curriculum was provided for review. The training curriculum provides information about what is sexual abuse and sexual harassment; how to detect and assess sexual abuse and sexual harassment; preserving physical evidence; how to respond and communicate with victims; how medical and mental health staff are to report any knowledge or suspicion of sexual abuse and sexual harassment. The training curriculum covers the requirements of this provision of the standard.</p> <p data-bbox="256 1471 1474 1628">c-d) Document Review – PREA training completion documents and specialized medical training documents were requested for eight medical and mental health staff and two contract medical staff. The facility provided PREA training and specialized medical training for all ten.</p> <p data-bbox="256 1668 1398 1740">Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of this standard.</p>

115.41	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

a) JCPC policy 1400.03 page 11-12 states All detainees shall be assessed in-person, by GEO staff, during intake to identify those likely to be sexual aggressors or sexual abuse victims and shall house detainees to prevent sexual abuse, taking necessary steps to mitigate any such danger.

b) JCPC policy 1400.03 page 12 requires the initial classification process and initial housing assignment to be completed within twenty-four (24) hours of admission to the facility for all USMS detainees.

Screening Staff Interview - The staff that complete the initial risk screening of detainees at arrival to the facility said the screening is completed on the first day the offenders arrive or the next morning if they arrive late in the day.

Detainee Interviews - Most detainees could recall being asked the questions for the risk screening the first or second day after they arrived. Questions were about prior victimization, sexual orientation, gender identity, disabilities, criminal history and their feelings about being vulnerable to sexual abuse.

c) JCPC policy 1400.03 page 12 states "JCPC shall use the "GEO PREA Risk Assessment Tool-3pt" form for USMS detainees."

d) JCPC policy 1400.03 page 12 states the victim screening instrument has twelve questions that assesses for mental or physical disabilities, age, physical build, prior incarceration, violence in priors, prior sex offense convictions against a child or adult, identification as or perceived to be LGBTI or gender non-conforming, prior victim of sexual abuse in the community or institution, first time incarceration, detained solely for immigration, and the detainee's perception of vulnerability. The assessment follows this provision of the standard.

Screening Staff Interview - The staff that conduct initial risk screenings was interviewed. He was asked what factors the risk screening considers for risk of victimization. The factors he described covered all ten required by this provision of the standard and the policy. Some of the information is gathered or verified from review of the detainee records and some is gathered from detainee responses to questions in an interview. Sometimes the detainees record does not have much information, and he must ask the detainee more questions about their prior criminal history during the interview.

e) JCPC policy 1400.03 page 12 requires the abusiveness screening instrument has six questions that assesses for prior institutional sexual abuse or violence, conviction for a sex offense against an adult or child, and prior or current conviction for a violent offense. The assessment follows this provision of the standard.

Screening Staff Interview - Staff that complete the initial screening said answers from the detainee interview and the detainee record are used to assess for prior acts of sexual abuse, prior convictions for violent offenses and a history of prior institutional violence or sexual abuse. He reviews the criminal history and institutional conduct record in addition to asking the detainee questions about prior criminal history and conduct. Sometimes the detainees record does not have much information, and he

must ask the detainee more questions about their prior criminal history during the interview.

f) JCPC policy 1400.03 page 12 requires JCPC to use the "GEO PREA Vulnerability Reassessment Questionnaire" form to conduct the reassessment. The USMS detainee reassessment will be conducted in-person within thirty (30) days from the initial assessment at the facility.

Screening Staff Interview - The staff that completes the risk screening re-assessment said he interviews the detainee again to ask the same questions that are used for the intake screening. The detainee's answers and the detainee record are used to review the intake risk assessment for changes due to new information prior to 30 days.

Detainee Interview - Twenty-six detainees were interviewed and asked if staff asked them questions about prior victimization, disabilities, identifying as or are perceived to be transgender, gay or bisexual, or if they felt vulnerable to sexual abuse at the facility a second time around 30 days after arrival. Eight detainees could recall being asked again about 30 days later. Four were not at the facility long enough for the reassessment. Three didn't recall being asked the questions. Some detainees that had been at the facility six months or more remembered being asked recently in June.

Document Review - Twenty-six detainees were randomly selected for review of assessments. Twenty-two had been at JCPC more than 30 days. Eight reassessments were completed within 30 days. Seven reassessments had been completed in June of 2024, several months after their arrival. Three reassessments were completed a few days beyond 30 days. The PREA Compliance Manager was asked why there were eight reassessments that were completed in June. He said the staff that completed assessments got confused by the DHS standard that is 90 days for ICE detainees. He informed the staff of the mistake in June after an internal audit and had them complete the reassessments late. The PCM provided documentation of the DOJ risk assessment standards re-training conducted with the risk assessment staff.

Corrective Action Completed- Additional reassessments were requested during the six weeks following the onsite audit to ensure time frames meet the standard. Thirty-three reassessments were completed and provided for review. All Thirty-three were completed within 30 days of the detainee's arrival date and demonstrated the correction completed before the onsite audit was now a practice that meets this provision of the standard.

g) JCPC policy 1400.03 page 12 states the detainee shall be reassessed for risk of victimization or abusiveness, when warranted based upon the receipt of additional, or relevant information, or following an incident of abuse or victimization.

h) JCPC policy 1400.03 page 13 prohibits disciplining a detainee for refusing to answer questions for the assessment or for not providing complete information to questions.

	<p>Screening Staff Interview - The staff said he completes a reassessment when detainees are a victim or perpetrator in a sexual abuse investigation.</p> <p>i) JPCPC policy 1400.03 page 13 states “JPCPC recognizes the sensitive nature of the responses to questions asked related to sexual victimization or abusiveness and to ensure that sensitive information is not exploited by employees or other detainees, sensitive information shall be limited to need-to-know employees only for the purpose of treatment, programming, housing, and security and management decisions.</p> <p>PREA Coordinator Interview - the PREA Coordinator said the information on the risk assessments is confidential and limited to staff that complete them or who are authorized access. The assessments are in an electronic system that is password protected.</p> <p>PCM Interview - The PCM said the risk assessment is in an electronic system with limited access. Only staff that complete the assessment, housing or work assignments and programming decisions are authorized access.</p> <p>Screening Staff Interview - The staff that complete risk assessments said the information that is contained in a risk assessment is confidential and only authorized staff have access.</p> <p>Based on the information from interviews, policies, and documents reviewed, the finding is the facility meets the provisions of the standard.</p>
--	---

115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JPCPC policy 1400.03 page 13 requires the results from the risk assessment be used to inform assignment of detainee to housing, recreation, voluntary work, and other activities. . The policy reflects the provision of the standard.</p> <p>PCM Interview - The PCM said the risk assessment results are utilized as a factor in detainee housing assignments. Alerts are generated for detainees at risk of being a victim or an abuser. An detainee that is at risk of being a victim cannot be housed with an detainee that is a risk to be an abuser/perpetrator.</p> <p>Risk Screening Staff Interview - The staff that complete the risk assessments said the results can be either a risk for victimization, risk for abuser/perpetrator or no risk. The results create alerts in the detainee information system. The risk assessment alerts are reviewed when making housing assignments.</p> <p>b) JPCPC policy 1400.03 page 14 requires the facility to make individualized determinations about how to ensure the safety of each detainee. The policy reflects the provision of the standard.</p>

Risk Screening Staff Interview – The staff that complete the risk assessments said the results can be either a risk for victimization, risk for abuser/perpetrator or no risk. The results create alerts in the detainee information system. The risk assessment alerts are reviewed when making housing assignments.

c) JPC policy 1400.03 page 14 states “In making housing and programming assignments for transgender or intersex individuals at JPC, the facility shall consider on a case-by-case basis whether the placement would present management or security problems, and the effects of placement on the detainee’s health and safety.” The policy reflects the provision of the standard.

The Transgender Care Committee consists of the Warden, Assistant Warden, PREA Compliance Manager, medical and mental health staff. The TCC will consider the transgender detainee’s criminal history, medical and mental health needs, the transgender detainee’s own views of safety, and prior mental health evaluations. The TCCC’s decision will be documented on the Transgender Care Committee Summary form.

PCM Interview – The PCM said he is notified by the Case Managers that conduct the risk screening when an detainee identifies as transgender. They complete a Transgender Preference form and send it to him. He said the facility has a Transgender Care Committee that meets with the transgender detainee to ask them about their views about safety in housing, work and program assignments at the facility. The committee also asks the transgender detainee what their preference is for gender of staff for searches, pronoun preference and if they want to shower separately from the other detainees in the housing unit. This is all documented on the Transgender Care Committee Summary form.

Detainee Interviews – One detainee that identified as transgender said they met with the facility Transgender Care Committee the first week after arrival at the facility. The committee asked her about views of safety and preferences of facility placement based on gender, bed assignment, work and program assignments, pronouns, searches and showers. She chose to shower at a separate shower area where she has privacy.

Document Review – The facility provided the Transgender Care Committee Summary form for one detainee that had identified as transgender at the intake risk assessment. The form documents the transgender detainee’s views of safety, preferences for showers, searches, and pronouns. A final housing decision is documented on the forms and signed by the committee members.

d) JPC policy 1400.03 page 15 states “Housing and programing assignments for each transgender and intersex detainee shall be reassessed at least twice each year to determine threats to safety experienced by the detainee.” . The policy reflects the provision of the standard.

Document Review – A TCC Summary form was completed for a six month review of a transgender detainee.

	<p>e) JCPC policy 1400.03 page 15 requires serious consideration to be given to the individual’s own views with respect to his/her own safety. The policy reflects the provision of the standard.</p> <p>f) JCPC policy 1400.03 page 15 requires transgender and intersex detainees to be given an opportunity to shower separately from other detainees. The policy reflects the provision of the standard.</p> <p>PREA Coordinator Interview – The PREA Coordinator said placing transgender detainees in dedicated housing units or wings is prohibited. The views of the detainee is given serious consideration.</p> <p>PREA Compliance Manager – The PCM said transgender detainees are offered separate areas to shower due to showers being in a small dorm area. Transgender detainees can shower in an empty dorm, medical or at intake.</p> <p>Detainee Interview – A transgender detainee said she is showering in a separate area and have privacy.</p> <p>g) JCPC policy 1400.03 page 15 states “LGBTI individuals at JCPC shall not be placed in housing units solely based on their identification as LGBTI unless such a dedicated unit exists in connection with a consent decree, legal settlement, or legal judgment to protect such individuals.” The policy reflects the provision of the standard.</p> <p>Detainee Interview – A transgender detainee said her housing assignment was not in a dedicated unit for transgender detainees and placement was the same as other detainees.</p> <p>Based on the information from interviews, policies and documents reviewed, this auditor finds the facility meets the provisions of the standard.</p>
--	---

115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JCPC policy 1400.03 page 22 states “Involuntary segregated housing may be used only after assessing of all available housing alternatives has shown there are no other means of protecting the individual at JCPC.” “If the facility cannot conduct such an assessment immediately, the individual may be placed in involuntary segregated housing for no more than 24 hours while completing the assessment.”</p> <p>b) JCPC policy 1400.03 page 22 requires the detainee to have all possible access to programs and services for which he/she is otherwise eligible, and the facility will document and justify on the Sexual Assault/Abuse Available Alternatives Assessment form any restrictions imposed. Justification must include the services restricted,</p>

	<p>reason for restriction, and duration of the restriction.</p> <p>c) JCPC policy 1400.03 page 22 states “The facility should assign detainees vulnerable to sexual abuse or assault to administrative RHU for their protection until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of thirty (30) days.”</p> <p>e) JCPC policy 1400.03 page 22 states if the segregation goes beyond 30 days, the facility is required to conduct a review every 30 days to determine if the involuntary segregation is necessary.</p> <p>The facility reported on the PAQ that no detainees were involuntarily held in restrictive housing due to high risk for victimization from the assessment during the review period. None of the detainees interviewed in segregation reported being involuntarily segregated due to being a high risk for sexual abuse.</p> <p>Warden Interview - The Warden said an detainee has not been involuntarily placed in restrictive housing based on a high risk of victimization assessment in the last year. Staff will look at all alternatives in housing prior to placing an detainee involuntarily in restrictive housing. The goal is to keep the detainee in general population.</p> <p>Staff that Supervise Segregated Housing - A captain that supervises the RHU (segregation) was interviewed. He said that detainees involuntarily placed in restrictive housing for high risk of victimization would still have some access to education or other program materials through workbooks or their tablets. Restrictions on privileges and programs would be documented. A review of placement in restrictive housing is conducted every 7 days after placement and then every 30 days. The goal is to get them removed from RHU as soon as it is safe to do so. He said there has not been an detainee involuntarily placed in segregation for high risk of victimization in the last year.</p> <p>Based on the information from interviews and policies reviewed, this auditor finds the facility meets the provisions of this standard.</p>
--	---

115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JCPC policy 1400.03 page 23 says JCPC provides multiple ways for detainees to privately report sexual abuse and assault, retaliation for reporting sexual abuse, or staff neglect, or violations of responsibilities that may have contributed to such incidents.</p> <p>Random Staff Interview - All staff said that an detainee could make a verbal report to staff in private, call on the phone to the number posted in the housing units, write a</p>

report and put it in the mailbox. Anonymous reports can be written without a name on it and dropped in the detainee mailbox.

Detainee Interviews - Most detainees said they could make a report of retaliation, staff failure to report, or sexual abuse and sexual harassment through the PREA hotline on the offender phone system or the tablet, write to their case manager on paper or through the kite on the tablet, tell their family to report for them, or just tell any staff. Every detainee interviewed knew several methods of reporting.

Tour Observations - PREA reporting posters in English and Spanish were observed in all housing units, hallways outside of housing units, recreation areas, medical waiting area, visiting area, library and administration area. The posters were in bright colors that stood out and in a location that could easily be read. A test call was made to the PREA hotline from the detainee phone system in the housing unit. The voicemail left was received by the PCM on his cell phone while he was on the tour.

b) JPCPC policy 1400.03 page 23 states the facility will provide detainees contact information on how to report sexual abuse or assault to a public or private entity or office that is not part of GEO (e.g., contracting agency ICE or USMS) and that is able to receive and immediately forward detainee reports of sexual abuse to facility or GEO officials, allowing the detainee to remain anonymous upon request.

Document Review - A memorandum of understanding between Family Time Crisis Center, a community-based counseling center, and JPCPC was provided for review. The MOU establishes a 24 hour 7 day a week hotline for detained to report sexual abuse or sexual harassment to the community-based counseling center. The community-based counseling center will then immediately forward the report to JPCPC. The MOU was signed by both parties in July 2023 and will terminate at the request of one or both parties.

PCM Interview - The PCM said detainees can report to the Family Time Crisis Center as the agency outside of JPCPC. The detainees can mail a written report to Family Time Crisis Center at the address provided. If the detainee wants to remain anonymous, they can leave their name off the report and envelope.

Detainee Interviews - Most detainees knew there was someone they could report to outside of the facility. If they wanted to remain anonymous, they would just leave their name off of the report. They also said they can just write a written note without their name on it and drop it in the detainee mailbox. When asked if the information was in the detainee handbook, most could recall that they saw it in there. Detainees can also see reporting information on posters in the housing units.

c) JPCPC policy 1400.03 page 23 requires employees to accept reports made verbally, in writing, anonymously and from third parties and shall promptly document any verbal report.

Random Staff Interview - Staff said the detainees could report to them verbally, in writing, anonymously in writing or have family make a report. Staff said they are required to do an incident report for all reports of sexual abuse or sexual harassment

	<p>to include verbal reports. The report must be turned in before the end of their shift on the same day.</p> <p>Detainee Interviews - Most detainees said they could make a report of retaliation, sexual abuse and sexual harassment through the offender phone system or the tablet, write to their case manager, tell their family to report for them, or just tell any staff. Every detainee interviewed knew several methods of reporting.</p> <p>d) JPCPC policy 1400.03 page 23 states staff can privately report an incident of sexual abuse or sexual harassment to the chief of security or upper-level executive. Staff can also call the employee hotline or third part reporting line on the GEO website.</p> <p>Random Staff Interviews - When asked how staff can make a private report, all staff said they could use the GEO employee hotline. They could also ask to talk to their supervisor in private to make the report. Another private way to report was to email the PCM, investigator or shift supervisor.</p> <p>Investigation File Review - Investigations were initiated by written reports to staff, an anonymous written report received by staff and two third party written reports. In all cases, the written report was provided to the facility investigator for immediate response.</p> <p>Based on the information from interviews, policies, and documents reviewed, the facility meets the provisions of the standard.</p>
--	---

115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) The facility reported having administrative procedures for detainees to report sexual abuse through grievances, making this standard applicable to JCPC.</p> <p>b) JCPC policy 1400.03 page 24 states "There is no time limit for when a detainee at JCPC may submit a grievance regarding an allegation of sexual abuse or sexual harassment. JCPC may apply otherwise-applicable time limits to any portion of the grievance that does not allege an incident of sexual abuse." "Individuals in a GEO facility are not required to use any informal grievance process or attempt to resolve with employees an alleged incident of sexual abuse and sexual harassment."</p> <p>c) JCPC policy 1400.03 page 24 states "Detainees at JCPC have a right to submit grievances alleging sexual abuse or sexual harassment to someone other than the staff member who is the subject of the complaint. Such grievance is also not referred to a staff member who is the subject of the complaint."</p> <p>d) JCPC policy 1400.03 page 24 states "The facility shall issue an initial response</p>

on the grievance within five (5) days of receipt. A final decision shall be issued on the merits of any portion of the grievance alleging sexual abuse or sexual harassment within 90 days of the initial filing of the grievance. Computation of the 90 days shall not include time consumed by detainees at JCPC in preparing any administrative appeal. Facilities may claim an extension of time to respond (for good cause) of up to 70 days and shall notify the individual of the extension in writing (see attachment Q). The facility must provide the individual a date by which a decision will be made. At any level of the administrative process, including the final level, if the individual does not receive a response within the time allotted for a reply, including any properly noticed extension, the individual may consider the absence of a response to be a denial at that level.”

The facility reported two grievances filed that reported sexual abuse. The PCM said the two are from the same detainee and is still pending investigation. In the review of six completed investigations from the last 12 months, there were no reports of sexual abuse or sexual harassment made by a detainee filing a grievance.

e) JCPC policy 1400.03 page 24 states “Third parties (e.g., fellow detainees at JCPC, employees, family members, attorneys, and outside advocates) may assist detainees at JCPC in filing requests for administrative remedies relating to allegations of sexual abuse and sexual harassment and may file such requests on behalf of detainees at JCPC.” “The alleged victim must agree to have the request filed on his or her behalf; however, he/she is not required to pursue any subsequent steps in the administrative remedy process personally. If the individual declines to have the request processed on their behalf, the facility shall document the individual’s decision.”

f) JCPC policy 1400.03 page 24 states Individuals in a GEO facility may file an emergency grievance if he/she is subject to a substantial risk of imminent sexual abuse.” “An initial response to the individual’s emergency grievance is required within 48 hours and a final decision shall be provided within five (5) calendar days.” “The initial response and final decision shall document the facility’s determination as to whether the detainee is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.”

The facility reported two emergency grievances received regarding sexual abuse in the last 12 months. The PCM said the two are from the same detainee and is still pending investigation. In the review of six completed investigations from the last 12 months, there were no reports of sexual abuse or sexual harassment made through a detainee filing an emergency grievance.

Document Review - the facility provided the two grievances filed by a detainee that reported sexual abuse with substantial risk of imminent sexual abuse. An investigation was assigned the same day the detainee filed the grievance. A response was provided to the detainee on the same day.

g) JCPC policy 1400.03 page 24 states “Individuals in a GEO facility may receive a disciplinary report for filing a grievance relating to alleged sexual abuse or sexual harassment only when the facility can demonstrate the grievance was filed in bad

	<p>faith.”</p> <p>Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.</p>
--	--

115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JPCPC policy 1400.03 page 32 states JPCPC will make available to detainees information about local organizations that can assist detainees who have been victims of sexual abuse, including mailing addresses and telephone numbers (including toll-free hotline numbers where available). If local providers are not available, the facility shall make available the same information about national organizations.</p> <p>Tour Observations – posters in English and Spanish were observed in the housing units that provided mailing addresses and phone numbers for four local victim advocate organizations. A speed dial number on the detainee phone system was provided for the Montgomery County Women’s Center. A test call was made to the number by this auditor. A person answered and verified she was with the Montgomery County Women’s Center. She said the detainees could call the hotline to report sexual abuse or request victim advocate services. Information for MCWC was also found on page 7 of the detainee handbook.</p> <p>Detainee Interview – Most detainees recalled being told about services for victims of sexual abuse during orientation. Most see the posters about victim services. Some said they didn’t need the service and do not pay attention to the posters.</p> <p>b) JPCPC policy 1400.03 page 32 states “JPCPC shall enable reasonable communication between detainees and these organizations, as well as inform detainees (prior to giving them access) of the extent to which GEO policy governs monitoring of their communications and when reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.”</p> <p>c) Document Review – A memorandum of understanding between Family Time Crisis Center, a community-based counseling center, and JPCPC was provided for review. The MOU establishes a 24 hour 7 day a week hotline for detainees to request support services. The FTCC agrees to provide follow-up care detainees that have been subject to abuse. The MOU was signed by both parties in July 2023 and will terminate at the request of one or both parties.</p> <p>Based on the information from tour observations, policies and documents reviewed, it has been determined the facility meets the standard.</p>

115.54	Third-party reporting
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1481 501">JCPC policy 1400.03 page 25 states JCPC posts GEO’s third-party reporting procedures publicly. JCPC shall have third-party reporting posters posted in all public area in English and Spanish to include lobby, visitation, and staff break areas within the facility.</p> <p data-bbox="256 546 1485 781">GEO policy 5.1.2-A PREA page 15 states “GEO shall post third-party reporting procedures on its public website showing its method of receiving third-party reports of sexual abuse and sexual harassment on behalf of individuals in a GEO facility. In all facilities, third-party reporting posters shall be posted in all public areas in English and Spanish to include the lobby, visitation areas, and staff break areas within the facility.”</p> <p data-bbox="256 893 1469 1050">Third party reporting information was found at https://www.geogroup.com/prea under How to Report Allegations of Sexual Abuse/Sexual Harassment of Someone in a GEO Facility or Program. The PREA Director (PREA Coordinator) contact information is listed on the page.</p> <p data-bbox="256 1162 1474 1397">Tour Observation – The GEO third party reporting English and Spanish poster was observed on the wall in the entrance to the facility and in the visiting room. These are areas that family and other visitors would be likely to observe the information. These posters were also seen in other areas of the facility to include housing units, barbershop, library, and intake area. Two investigations were reported via third-party by a detainee on behalf of another detainee.</p> <p data-bbox="256 1509 1449 1666">A test email was sent to the GEO PREA email and a test phone call was made to the GEO third party reporting hotline on the GEO PREA webpage. The email was immediately returned as received and the call was answered by the PREA Coordinator.</p> <p data-bbox="256 1778 1449 1856">Based on the information from tour observations, policies and documents reviewed, the facility meets the standard.</p>

115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard

Auditor Discussion

a) JCPC policy 1400.03 page 25 requires staff to report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment whether it occurred at JCPC or another institution. Staff are also required to report retaliation against a detainee or staff and neglect by staff to report.

Random Staff Interviews - All staff interviewed said they are required to immediately report all knowledge, information, or suspicion of an incident of sexual abuse or sexual harassment; retaliation against staff or detainees that report an incident; and staff neglect to report an incident of sexual abuse/sexual harassment or retaliation.

b) JCPC policy 1400.03 page 26 states "Apart from reporting to designated supervisors or officials, employees shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary to help protect the safety of the victim or prevent further victimization of other detainees, or staff in the facility, or to make medical treatment, investigation, law enforcement, or other security and management decisions."

Random Staff Interviews - All staff said they are not allowed to share information reported to them about an incident of sexual abuse or sexual harassment with staff that are not involved in the response or investigation.

c) GEO policy 5.1.2-A PREA page 15 states "Unless precluded by federal, state, or local law, medical and mental health practitioners are required to report allegations of sexual abuse and sexual harassment and to inform individuals of the practitioner's duty to report, and the limitation of confidentiality, at the initiation of services."

Medical Staff Interview - The medical staff interviewed said she is required to report information provided by a patient about incidents of sexual abuse or sexual harassment that occurred in an institution to the Shift Supervisor. She said detainees are notified of this duty to report during the medical transfer screening process at arrival to the facility.

Mental Health Staff Interview - The mental health staff interviewed stated he informs detainees at the beginning of services that he must report any incident of sexual abuse and sexual harassment that occurred in a corrections setting the detainee may tell him. He has not had an detainee report anything to him in the last year.

Document review - the facility provided ten examples of the Consent for Mental Health Services form that informs the detainee of mental health staff's duty to provide information about sexual abuse incidents to facility investigators.

d) JCPC policy 1400.03 page 26 states "Allegations of sexual abuse in which the alleged victim is under the age of eighteen (18) or considered a vulnerable adult under state or local vulnerable person's statute, the facility shall report to designated state or local services agencies under applicable mandatory reporting law."

PCM Interview - If an detainee that would meet the definition of a vulnerable adult

	<p>reported an incident of sexual abuse, the PCM said the facility would contact the Texas Department of Family and Protective Services as required. He said JCPC does not have detainees under 18.</p> <p>Warden Interview - The Warden said if an detainee that fits the definition of a vulnerable adult alleged being a victim of sexual abuse, the facility would be required to contact the Texas Department of Family and Protective Services to report the abuse. He didn't recall having to make a report on behalf of a vulnerable adult. He said the facility does not house detainees under 18 years of age.</p> <p>e) JCPC policy 1400.03 page 26 requires the facility to report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators or outside agencies responsible for investigating these types of incidents.</p> <p>Warden Interview - The Warden said all reports of sexual abuse and sexual harassment, including third party and anonymous reports, are given to the facility investigator for review. If the allegation is sexual abuse, the facility investigator will contact the US Marshals. If the allegation is sexual harassment, the facility investigator will initiate an investigation.</p> <p>Based on the information from interviews, policies and documents reviewed, this auditor finds the facility meets the provisions of the standard.</p>
--	---

115.62	Agency protection duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>JCPC policy 1400.03 page 26 requires staff to take immediate action to protect a detainee if staff have reasonable belief a detainee is in substantial risk of imminent sexual abuse. Information pertaining to the allegation is to be handled in a confidential manner and only shared with designated staff as directed in policy.</p> <p>Agency Head Interview - If an detainee reported being in imminent risk of sexual abuse, the Executive Vice President said the staff will take immediate action to protect the detainee by separating them from the alleged perpetrator. An investigation would be initiated to determine if there are other actions needed in response.</p> <p>Warden Interview - The Warden said staff would take immediate action to separate the victim and perpetrator if there was an imminent risk of sexual abuse. The detainee perpetrator could be placed in segregation or staff would be placed on a post away from the victim or suspended temporarily if needed.</p> <p>Random Staff Interviews - All staff interviewed said if a detainee were in imminent</p>

	<p>risk of sexual abuse, they would take immediate action to protect the detainee by separating them from other detainees and keeping the detainee with them while they notify the shift supervisor.</p> <p>The facility reported on the PAQ no instances of imminent risk of sexual abuse requiring immediate action during the review period.</p> <p>Based on the information from interviews, policies and documents reviewed, this auditor finds the facility meets the provisions of the standard.</p>
--	---

115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-b) JCPC policy 1400.03 page 31 requires In the event a detainee alleges that sexual abuse occurred while confined at another facility, the Facility shall document those allegations and the facility administrator or assistant facility administrator (in the absence of the facility administrator) where the allegation was made shall contact the facility administrator or designee where the abuse is alleged to have occurred within seventy-two (72) hours.</p> <p>The facility reported on the Pre-Audit Questionnaire six allegations of sexual abuse reported by detainees at JCPC that occurred at another facility during the review period. The JCPC Warden sent emails to the other facility administrator notifying them of the sexual abuse allegation that occurred at their facility.</p> <p>c) JCPC policy 1400.03 page 31 states “The facility shall maintain documentation that it has provided such notification in writing and all actions taken regarding the incident.”</p> <p>d) GEO policy 5.1.2-A PREA page 20 states “Any facility that receives the notification of alleged abuse or harassment is required to ensure the allegation is investigated in accordance with PREA standards.”</p> <p>Agency Head Interview - The Executive Vice President said an allegation of sexual abuse should be reported to the Facility Administrator of the facility where the incident is alleged to have occurred. If the PREA Coordinator receives the allegation the information is forwarded to the facility administrator and the investigator.</p> <p>Warden Interview - During his interview, the Warden said if an detainee at JCPC reports an incident of sexual abuse that occurred at another facility, he would forward information to the facility head of the other facility. This would be done within 72 hours and documented.</p> <p>PCM Interview - If an detainee at JCPC reports an incident of sexual abuse that occurred at another facility, the Facility investigator will get the report from the</p>

	<p>alleged victim and send it to the Warden to be forwarded to the facility where the incident took place.</p> <p>There were no completed investigations reviewed that were a response to an allegation of sexual abuse received by JCPC from another facility during the review period.</p> <p>Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.</p>
--	--

115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>a) JCPC policy 1400.03 page 26 requires security staff first responders to: separate the victim from the alleged abuser, preserve and protect evidence at the scene and/or on the victim and the alleged detainee abuser, take the victim to medical, and immediately notify the highest supervisory authority on site. The facility said six allegations of sexual abuse occurred in the last 12 months where the victim and abuser were separated. None were within a time frame to allow for the collection of physical evidence.</p> <p>b) JCPC policy 1400.03 page 26 states “If the first responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence; remain with the alleged victim and notify security staff.”</p> <p>Random Staff Interviews - Security staff were selected at random from shift rosters for interview. All staff were asked to describe their responsibilities and steps they are required to complete when an detainee makes a report of sexual abuse/sexual assault to them. All staff said they were required to separate the victim from the perpetrator, protect evidence on the victim and at the scene, notify the shift supervisor and wait for custody staff to come take the detainee to medical or take the detainee to medical if asked. Non-security contract staff said they are required to keep the detainee with them and notify the shift supervisor so security staff could take them to medical. Non-security contract staff would be notifying security staff when they notify the shift supervisor (a captain or lieutenant) of the report of sexual abuse.</p> <p>Investigation File Review - There were six completed investigations provided for review. One investigation involved an allegation of sexual abuse that was reported anonymously. No time frame or location was provided to allow staff to determine if there was evidence to protect. The remaining five investigations completed were sexual harassment allegations.</p> <p>Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.</p>

115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility provided the JCPC PREA Coordinated Response Plan as the institutional plan to coordinate the response of staff to an incident of sexual abuse. The plan is specific to JCPC and delineates the responsibilities for the PREA Compliance Manager, first responder staff, Shift Supervisors, medical staff, mental health staff, investigators. The plan also provides information for forensic examinations and contacting victim advocates.</p> <p>Warden Interview - The Warden said the facility has a coordinated response plan for allegations of sexual assault and sexual abuse. The plan is specific to JCPC and informs staff of their responsibilities in response to allegations of sexual abuse. The plan gives direction to first responders, shift supervisors, medical, mental health, investigators, and the PREA Compliance Manager.</p> <p>Based on the information from review of the facility coordinated plan and the Warden interview, this auditor finds the facility meets the standard.</p>

115.66	Preservation of ability to protect inmates from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Agency Head Interview - The Agency Head designee said GEO has a collective bargaining agreement that permits the removal of alleged staff sexual abusers from contact with the detainee while there is a pending investigation.</p> <p>Document Review - The facility provided the collective bargaining agreement for review. It does not prevent GEO from assigning staff away from an detainee that has alleged the staff committed sexual abuse or sexual harassment. Page 18, section 14.1 states officers may be placed on administrative leave during an OPR investigation, law enforcement, or client investigation for up to 120 days. If additional time is needed GEO may request an extension from the Union, which will not be unreasonably withheld.</p> <p>Based on the information from the interview and document review, the facility meets this standard.</p>

115.67	Agency protection against retaliation
---------------	--

Auditor Overall Determination: Meets Standard

Auditor Discussion

a) JCPC policy 1400.03 page 33 prohibits retaliation against any person, including a detainee that reports sexual abuse and sexual harassment or cooperates with an investigation of sexual abuse or sexual harassment. The policy designates the PSA Compliance Manager or mental health staff as the person responsible for monitoring retaliation of detainees.

b) JCPC policy 1400.03 page 33 requires the facility to employ multiple protection measures, such as housing changes, removal of alleged staff abusers from contact with victims, and emotional support services for detainees and employees who fear retaliation for reporting sexual abuse or for cooperating with investigations.

Staff Interview – The PCM said he is designated to monitor detainees for retaliation. He meets privately with the detainee weekly to ask if there has been any retaliation. He also monitors discipline, housing changes or program changes. If there is retaliation suspected or identified, he will investigate. If a detainee is suspected of retaliation, he can move the detainee to another unit or place them in segregation. If staff are suspected of retaliating, they can be placed on a no contact post or suspended pending an investigation. The response to remedy retaliation would be done immediately.

Warden Interview – If retaliation is suspected or there is evidence of retaliation, the Warden said he would have the Facility Investigator investigate the alleged retaliation. If an detainee is found retaliating against another detainee or staff, he or she can be disciplined and/or transferred if needed. If staff are retaliating against an detainee or staff, the staff can be disciplined up to termination. He would consult with HR to follow progressive discipline.

Agency Head Interview – The facilities have staff designated to monitor retaliation. Retaliation against a person that reported sexual abuse by staff or detainees is prohibited. All suspected retaliation is investigated and acted upon accordingly.

c) JCPC policy 1400.03 page 33-34 and GEO policy 5.1.2-A PREA page 22 requires monitoring for 90 days of any person, staff or detainee, that reports sexual abuse. The monitoring should include detainee disciplinary reports, housing or program changes, or staff negative reviews or reassignments. The monitoring can be terminated prior to 90 days when the outcome is unfounded.

Staff Interview – The PCM said he monitors discipline, housing changes or program changes. He meets with staff once a month for 90 days. He tells staff to contact him if they suspect or are experiencing retaliation. He said he can monitor for more than 90 days if there is circumstances that require it.

d) GEO policy 5.1.2-A PREA page 22 requires monitoring staff to meet with the detainee weekly in private.

	<p>Staff Interview – The PCM said he meets privately with the detainee weekly to ask if there has been any retaliation.</p> <p>e) JCPC policy 1400.03 page 26 requires the facility shall take appropriate measures to protect any other individual who expresses a fear of retaliation.</p> <p>Staff interview – The PCM said if a detainee is suspected of retaliation, he can move the detainee to another unit or place them in segregation. A transfer of the detainee to another US Marshals facility can be considered as well. If staff are suspected of retaliating, they can be placed on a no contact post or suspended pending an investigation.</p> <p>f) JCPC policy 1400.03 page 26 requires the monitoring to be terminated prior to 90 days when the outcome is unfounded.</p> <p>Document Review – A protection from Retaliation Log was provided for five of the six investigations completed during the review period. Three documented monitoring for retaliation for 90 days with weekly meetings. In two cases, the monitoring was ended when the detainee was released. There was no monitoring for retaliation in one case because there was no victim identified.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets all provisions of the standard.</p>
--	--

115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JCPC policy 1400.03 page 22 states “Involuntary segregated housing may be used only after assessing of all available housing alternatives has shown there are no other means of protecting the individual at JCPC.” “If the facility cannot conduct such an assessment immediately, the individual may be placed in involuntary segregated housing for no more than 24 hours while completing the assessment.”</p> <p>JCPC policy 1400.03 page 22 requires the detainee to have all possible access to programs and services for which he/she is otherwise eligible, and the facility will document and justify on the Sexual Assault/Abuse Available Alternatives Assessment form any restrictions imposed. Justification must include the services restricted, reason for restriction, and duration of the restriction.</p> <p>JCPC policy 1400.03 page 22 states “The facility should assign detainees vulnerable to sexual abuse or assault to administrative RHU for their protection until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of thirty (30) days.”</p> <p>JCPC policy 1400.03 page 22 states if the segregation goes beyond 30 days, the</p>

	<p>facility is required to conduct a review every 30 days to determine if the involuntary segregation is necessary.</p> <p>The facility reported on the PAQ that no detainees were involuntarily held in restrictive housing due to high risk for victimization from the assessment during the review period. None of the detainees interviewed in segregation reported being involuntarily segregated due to being a high risk for sexual abuse.</p> <p>Warden Interview - The Warden said an detainee has not been involuntarily placed in restrictive housing based on a high risk of victimization assessment in the last year. Staff will look at all alternatives in housing prior to placing an detainee involuntarily in restrictive housing. The goal is to keep the detainee in general population.</p> <p>Staff that Supervise Segregated Housing - A captain that supervises the RHU (segregation) was interviewed. He said that detainees involuntarily placed in restrictive housing for high risk of victimization would still have some access to education or other program materials through workbooks or their tablets. Restrictions on privileges and programs would be documented. A review of placement in restrictive housing is conducted every 7 days after placement and then every 30 days. The goal is to get them removed from RHU as soon as it is safe to do so. He said there has not been an detainee involuntarily placed in segregation for high risk of victimization in the last year.</p> <p>Based on the information from interviews and policies reviewed, this auditor finds the facility meets the provisions of this standard.</p>
--	---

115.71	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>a) JPCP policy 1400.04 page 3 states “When the facility conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.”</p> <p>Facility Investigator Interview - The Facility Investigator said he receives information from a report of sexual abuse or sexual harassment the same day or next day depending on the type of incident. He responds immediately to reports. If it is third-party or anonymous report, the process is the same. He will follow up with a third-party reporter if he needs more information. He will investigate an anonymous report the best he can based on the information provided in the report.</p> <p>Investigation File Review - Six investigations were completed during the last 12 months and provided for review. The investigations started promptly after the report was received. All investigations provided a thorough description of all evidence</p>

gathered and reviewed. All investigations were objective in credibility assessments, relying on facts and history review of the victim and suspect. Two investigations were reported by third party reports by detainees and one was an anonymous report.

b) JPCP policy 1400.04 page 3 states JPCP shall use investigators who have received specialized training in sexual abuse investigations.

Investigator Interview - The designated facility investigator was interviewed and said he has completed the specialized investigator training from the PRC training curriculum.

Documentation of investigations training for both Facility Investigators was verified in 115.34.

c) JPCP policy 1400.04 page 5 states "Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator."

Facility Investigator Interview - The Facility Investigator said in conducting administrative investigations he reviews video monitoring evidence, physical evidence, conducts interviews with the alleged victim, witnesses, and the alleged perpetrator. He will review the conduct and PREA history for the alleged victim, detainee perpetrator and staff perpetrator.

Investigation File Review - DNA and physical evidence was not present in the six completed investigations reviewed. Five were allegations of sexual harassment and one was a report of sexual abuse. Video evidence and interviews were predominant evidence relied upon in all the investigations. The Facility Investigator addressed the presence or absence of witnesses, video evidence and physical evidence in reports.

d) Investigator Interview - The Facility Investigator said the US Marshals Service conducts all criminal investigations. If he receives a report of sexual abuse, he notifies the USMS and provides the initial information. The USMS conducts compelled interviews and consults with the prosecutor if needed.

e) JPCP policy 1400.04 page 4 states "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 detainee/detainee or staff." "No agency shall require an individual in a GEO facility or program who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation."

Investigator Interview - The Facility Investigator said he would never require an detainee victim to complete a polygraph examination as a condition to proceed in an investigation. He determines the credibility of victim, witness and suspect on an individual basis and a review of their conduct history, prior PREA investigations or staff discipline record.

f) JCPC policy 1400.04 page 5 states “Administrative investigations (1) shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and (2) shall be documented in a written report format that includes at a minimum, a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.”

Investigator Interview – The Facility Investigator said he documents the review of staff actions or any failure to act in the investigation report. He said interviews with victims, witnesses and suspects are documented in the investigation report.

Investigation File Review – Staff actions or failure to act was reviewed in all six completed investigations. Investigation Reports were well written and addressed interviews with the victim, suspect and witnesses; video evidence review; physical evidence; staff actions; credibility of suspect; background for victim and suspect; and a description of the evidence standard relied upon for the outcome.

g) Investigator Interview – The Facility Investigator said the US Marshals Service conducts all criminal investigations.

h) JCPC policy 1400.04 page 5 states “Substantiated allegations of conduct that appear to be criminal shall be referred for prosecution.”

Investigator Interview – the facility investigator said if the USMS determines an allegation of sexual abuse is substantiated and there appears to be a criminal violation, the USMS will refer it to the prosecutor.

i) JCPC policy 1400.04 page 6 states “GEO shall retain all written reports referenced in this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years; however, for any circumstance, files shall be retained no less than ten years.”

j) JCPC policy 1400.04 page 4 states “The departure of the alleged abuser or victim from investigation.”

Facility Investigator Interview – The Facility Investigator said if the perpetrator leaves employment or is released, the investigation is continued, and he will attempt to contact the alleged perpetrator by phone for interview if this has not been done prior to them leaving. If there is a criminal investigation the USMS will continue the investigation.

l) JCPC policy 1400.04 page 4 states “When outside agencies investigate sexual abuse and sexual harassment, GEO facility staff shall endeavor to remain informed about the progress of the investigation at least once monthly.”

Facility Investigator Interview – The Facility Investigator said the detective for the USMS is very good at keeping him informed of what the progress is for criminal investigations. He is told when the USMS will not pursue a criminal investigation, and an administrative investigation can be conducted.

Warden Interview – The Warden said the US Marshal Service investigator has very

	<p>good communication with the Facility Investigator. USMS keeps the Facility Investigator up to date on progress with the criminal investigation and informs the Facility Investigator if USMS is not pursuing or provides the outcome of the criminal investigation.</p> <p>Based on the information from interviews, policies and documents reviewed, the finding is the facility meets all provisions of the standard.</p>
--	--

115.72	Evidentiary standard for administrative investigations
---------------	---

	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>JCPC policy 1400.04 Investigating Allegations of Sexual Abuse, Assault and Evidence Collection requires evidence standard no higher than a preponderance of evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Facility Investigator Interview – The Facility Investigator was asked what standard of evidence he used to substantiate a sexual abuse or sexual harassment investigation. He said he used the preponderance of evidence, which is more likely than not or more than 50% of the evidence shows either the incident did happen as reported or did not happen as reported (unfounded).</p> <p>Investigation File Review – There were six completed investigations during the review period. One sexual abuse investigation had an unsubstantiated finding due to no preponderance of evidence. There were five sexual harassment investigations completed. All five appeared to apply a preponderance of evidence standard in determining the outcome. Four were substantiated based on evidence that supported the victim’s allegation as it was reported.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the standard.</p>
--	---

115.73	Reporting to inmates
---------------	-----------------------------

	<p>Auditor Overall Determination: Exceeds Standard</p> <p>Auditor Discussion</p> <p>a) JCPC policy 1400.04 Investigating Allegations of Sexual Abuse page 11 requires the investigator or staff designated by the Facility Administrator to inform the detainee victim in writing whether the investigation outcome is substantiated, unsubstantiated or unfounded.</p>
--	---

Warden Interview - The Warden said all inmates are notified of the outcome for both sexual abuse and sexual harassment investigations by the Facility Investigator for administrative investigations and criminal investigations.

Investigator Interview - The Investigator said he notifies the alleged victims of the investigation outcome for administrative sexual abuse and sexual harassment involving staff and inmate perpetrators. The Notification of Outcome of Allegation form is signed and filed in the inmate record.

b) JCPC policy 1400.04 page 11 requires the facility to request the relevant information from the outside agency that may conduct the investigation.

JCPC conducts all administrative investigations, however criminal investigations are completed by the US Marshals. If there is a criminal investigation, he said he is notified of that investigation outcome by the outside agency and informs the detainee.

c) JCPC policy 1400.04 page 11 requires the facility to notify the detainee victim in cases involving staff of: a. The employee is no longer posted within the inmate/detainee's unit; b. The employee is no longer employed at the facility; c. The facility learns that the employee has been indicted on a charge related to sexual abuse within the facility; or d. The facility learns that the employee has been convicted on a charge related to sexual abuse within the facility.

The Notification of Outcome of Allegation form was reviewed and found to contain a-d from this provision of the standard and reflects the policy.

d) JCPC policy 1400.04 page 11 requires the facility to notify the detainee victim in cases involving other detainees of: a. The facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or b. The facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

The Notification of Outcome of Allegation form was reviewed and found to contain a & b from this provision of the standard and reflects the policy.

e) JCPC policy 1400.04 page 11 requires the detainee to be informed of the investigation outcome in writing on the Notification of Outcome of Allegation form. If there was a criminal investigation by an outside agency, the detainee will be provided an updated form with the criminal investigation outcome.

Document Review - Six completed investigations were provided for review. There was one investigation of an allegation of sexual abuse and five investigations of an allegation of sexual harassment. Three Notification of Outcome of Allegation forms were completed for sexual harassment investigations. Two detainees were released prior to the investigation conclusion and were not notified of the outcome. One sexual abuse allegation was reported anonymously. The detainee victim could not be identified; therefore staff could not provide notification of the outcome to the victim. There were no criminal investigations that required notifications.

	<p>Based on the information from interviews, policies and documents reviewed, the finding is the facility exceeds the standard by providing the outcome of sexual harassment investigations in addition to sexual abuse investigations when the standard only requires notification for sexual abuse investigation outcomes.</p>
--	--

115.76	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>a) JPCP policy 1400.04 page 12 states “Employees may be subject to significant disciplinary sanctions for substantiated violations of sexual abuse and harassment policies, up to and including termination for any employee found guilty of sexual abuse.” The policy reflects the requirements of this provision.</p> <p>b) JPCP policy 1400.04 page 12 states “Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.” The policy reflects the requirements of this provision.</p> <p>The facility reported zero staff were terminated for violating facility sexual abuse and sexual harassment policy during the last 12 months. There were no substantiated staff sexual abuse or sexual harassment investigations reviewed that were completed in the last 12 months.</p> <p>c) JPCP policy 1400.04 page 12 states “Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.” The policy reflects the requirements of this provision.</p> <p>The facility reported no staff being disciplined short of termination for violating the sexual abuse and sexual harassment policy during the last 12 months. There were no substantiated staff sexual abuse or sexual harassment investigations reviewed that were completed in the last 12 months.</p> <p>d) JPCP policy 1400.04 page 12 requires all terminations and resignation for such conduct shall be reported to law enforcement and licensing agencies, unless the activity was clearly not criminal.</p> <p>Based on the information from policies and documents reviewed, the facility meets the provisions of the standard.</p>

115.77	Corrective action for contractors and volunteers
---------------	---

	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>a) JPCPC policy 1400.04 page 12 states “Any contractor or volunteer who engages in sexual abuse or sexual harassment shall be prohibited from contact with individuals in a GEO facility and shall be reported to law enforcement and relevant licensing bodies, unless the activity was clearly not criminal.”</p> <p>The facility reported there were no contract staff or volunteers reported to law enforcement for engaging in sexual abuse of detainees.</p> <p>b) JPCPC policy 1400.04 page 12 requires the facility to notify the applicable GEO contracting authority who will take remedial measures and shall consider whether to prohibit further contact with detainees for violations of GEO sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>Warden Interview – The Warden said contract staff’s access to the facility would be removed if they are the subject of an administrative investigation of sexual abuse. If the outcome was substantiated, the contract staff’s removal from the facility would become permanent. These cases would also be referred to USMS for criminal investigation and possible referral for prosecution and contact with licensing agencies.</p> <p>Investigation File Review – There were no investigations where contract staff were the subject of an allegation of sexual abuse or sexual harassment during the review period.</p> <p>Based on the information from interviews and policies reviewed, this auditor finds the facility meets the provisions of this standard.</p>
--	--

115.78	<p>Disciplinary sanctions for inmates</p> <hr/> <p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>a) JPCPC policy 1400.04 page 12 requires detainees at JPCPC who are found guilty of engaging in sexual abuse involving other detainees in a GEO facility (either through administrative or criminal investigations) shall be subject to formal disciplinary sanctions.</p> <p>The review of all investigations completed during the review period found there were four substantiated cases of sexual harassment by a detainee. The detainee perpetrator in those cases received discipline for violating rules against sexual harassment.</p> <p>b) JPCPC policy 1400.04 page 12 requires sanctions to be commensurate with the</p>
---------------	---

	<p>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.</p> <p>c) JPCPC policy 1400.04 page 12 states “The disciplinary process shall consider whether an individual’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any should be imposed.”</p> <p>d) JPCPC policy 1400.04 page 12 requires the facility to offer counseling or other interventions designed to address the reasons or motivations for the abuse, the facility shall consider requiring the offending individual to participate as a condition of access to programs and other benefits.</p> <p>e) JPCPC policy 1400.04 page 13 states disciplining an detainee at JPCPC for sexual contact with an employee is prohibited unless it is found that the employee did not consent to the contact.</p> <p>f) JPCPC policy 1400.04 page 13 states a report of sexual abuse made in good faith by a detainee at JPCPC, based upon a reasonable belief that the alleged conduct occurred, will not constitute false reporting or lying.</p> <p>g) JPCPC policy 1400.04 page 13 states JPCPC may not deem that sexual activity between detainees is sexual abuse unless it is determined that the activity was coerced.</p> <p>Warden Interview – The Warden said detainees may be subject to disciplinary sanctions if there is a substantiated finding in an incident of sexual abuse involving an detainee perpetrator. The sanctions would be progressive based on the detainee’s discipline history and take into account any mitigating circumstances, such as mental illness or disabilities. Detainees would only be disciplined for committing sexual offenses against staff that did not consent.</p> <p>Based on the information from interviews, policies and documents reviewed, it has been determined the facility meets the provisions of the standard.</p>
--	---

115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-b) JPCPC policy 1400.03 page 13 requires the persons tasked with screening determine that a detainee has experienced prior victimization or perpetrated sexual abuse, the detainee shall be immediately referred to a qualified medical and/or mental health practitioner for medical and/or mental health follow up as appropriate, using the “PREA Medical/Mental Health Referral” form.</p> <p>Risk Screening Staff – The staff that conduct the initial and re-assessment risk</p>

screening said they offer mental health services to detainees that report being a prior victim of sexual abuse either in the community or in an institution. The offer is documented on a Referral to Holistic Services form. If the detainee has a prior conviction for sex offenses, they are referred for being a prior perpetrator of sexual abuse. Referrals are done at the time of the intake assessment on the day of arrival.

Detainee Interview – Four detainees that reported being prior victims of sexual abuse during the initial screening were interviewed. All reported being offered mental health services the day of arrival.

Document Review – four detainees reported being a prior victim at the intake risk assessment. The facility provided documentation of the offer for mental health services that is documented on the PREA Medical/Mental Health Referral form. The forms documented the detainee reported being a prior victim of sexual abuse at the risk assessment and offered the detainee mental health services on the day of arrival. One detainee had a prior history of perpetration of sexual abuse and was referred for mental health services on the PREA Medical/Mental Health Referral form on the day of arrival.

c) JCPC policy 1400.03 page 13 states “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 required by federal, state, or local law.”

Tour Observation – medical files were in an office that was in an area restricted to detainees. The files were in locked cabinets and a locked office.

Risk Screening Staff Interviews – Staff that complete risk assessments said the information obtained during the screening is confidential and limited access to authorized staff.

d) JCPC policy 1400.03 page 13 requires medical and mental health practitioners must obtain informed consent from detainees at JCPC before reporting information about prior sexual victimization that did not occur in an institutional setting.

Mental Health Staff Interview – The mental health staff interviewed said if an detainee reported prior sexual abuse that occurred outside of a correctional institution, she would have to be given consent to share that information with facility investigators.

Medical Staff Interview – The medical staff interviewed said if an detainee reported prior sexual abuse that occurred outside of a correctional institution, she would have to be given consent to share that information with facility investigators.

Based on the information from interviews, policies and documents reviewed, the facility is found to meet the provisions of the standard.

115.82	Access to emergency medical and mental health services
	Auditor Overall Determination: Exceeds Standard
	<p data-bbox="256 264 544 297">Auditor Discussion</p> <p data-bbox="256 338 1430 456">a) JCPC policy 1400.03 page 31 requires victims of sexual abuse to receive timely, unimpeded access to emergency medical treatment and crisis intervention services as directed by medical and mental health practitioners.</p> <p data-bbox="256 495 1441 651">Medical Staff interview - The Medical Staff said a victim of sexual abuse or sexual assault would be evaluated for emergent injuries, stabilized and sent the local hospital for emergency medical services or forensic examination based on the time frame.</p> <p data-bbox="256 689 1374 763">Mental Health Staff Interview - staff said they would provide crisis intervention services and ensure the detainee victim is stable.</p> <p data-bbox="256 801 1477 1003">b) Staff Interviews - All randomly selected staff were asked about first responder duties. All staff said the facility has 24 hour nursing and would not have a situation where medical staff are not on duty. All staff said they would protect the victim, notify the shift supervisor and wait for other custody staff and medical staff to respond. Some said they could take the detainee to medical if needed.</p> <p data-bbox="256 1041 1465 1198">c) JCPC policy 1400.03 page 32 states emergency medical access will include offering timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care.</p> <p data-bbox="256 1236 1473 1310">Medical Staff Interview - Medical staff said victims of sexual assault/sexual abuse can be offered STI testing and treatment at the emergency room or at the facility.</p> <p data-bbox="256 1348 1469 1467">d) JCPC policy 1400.03 page 32 states "All services shall be provided without financial cost to the victim and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident."</p> <p data-bbox="256 1505 1473 1832">There was only one investigation of a sexual abuse allegation completed during the review period. The detainee that reported was anonymous. The detainee was not evaluated by medical and mental health. There were five investigations of sexual harassment allegations. In all five, the detainee victim was seen by medical and mental health staff for evaluation. Medical and mental health documentation was provided in the investigation case file for all five. This exceeds the standard's requirement to provide services for incidents of sexual abuse by providing services to both victims of sexual abuse and sexual harassment.</p> <p data-bbox="256 1870 1401 1944">Based on the information from interviews, policies and documents reviewed, the finding is the facility exceeds the provisions of the standard.</p>

115.83	Ongoing medical and mental health care for sexual abuse victims
---------------	--

and abusers

Auditor Overall Determination: Meets Standard

Auditor Discussion

a) JCPC policy 1400.03 page 33 states JCPC shall offer medical and mental health evaluations (and treatment where appropriate) to all victims of sexual abuse while in detention.

Medical Staff Interview - The medical staff interviewed said that an detainee victim would be offered a mental health referral, medical monitor and treatment of wounds or injuries, and access to medications for STI.

Mental Health Staff Interview - The mental health staff interviewed said mental health follow up services and treatment would be offered and provided to the detainee victim of sexual abuse. Referral could be made to outside services upon release.

b) JCPC policy 1400.03 page 33 requires the evaluation and treatment to include 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.

Medical and Mental Health Staff Interview - all medical and mental health staff said the level of care they can provide is consistent with the community level of care

c) JCPC policy 1400.03 page 33 requires services to be provided in a manner that is consistent with the level of care the individual would receive in the community.

d) JCPC policy 1400.03 page 33 requires victims of sexually abusive vaginal penetration by a male abuser while incarcerated shall be offered pregnancy test.

Medical Staff Interview - Medical staff said female detainees would be provided pregnancy testing as medically necessary.

e) JCPC policy 1400.03 page 33 states if pregnancy results from an instance of sexual abuse, the victim shall receive timely and comprehensive information about lawful pregnancy-related medical services.

Medical Staff Interview - Medical staff said female detainees would be provided information about pregnancy medical services.

f) JCPC policy 1400.03 page 33 requires victims to be offered tests for sexually transmitted infections as medically appropriate.

g) JCPC policy 1400.03 page 33 states all services shall be provided without financial cost to the victim and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

h) JCPC policy 1400.03 page 33 requires the facility to attempt to complete a mental health evaluation on all known detainee-on-detainee abusers within sixty (60)

	<p>days of learning of such abuse history and offer treatment deemed appropriate by mental health practitioners.</p> <p>Mental Health Staff Interview – mental health staff she would provide services to prior perpetrators of sexual abuse like victim services that are based on trauma. Not participating would not prevent the detainee from being in other programs.</p> <p>There was only one investigation of a sexual abuse allegation completed during the review period. The detainee that reported was anonymous. The detainee was not evaluated by medical and mental health.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility meets the provisions of the standard.</p>
--	---

115.86	Sexual abuse incident reviews
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>a-b) JCPC policy 1400.03 page 35 states JCPC will conduct a sexual abuse incident review after every sexual abuse and sexual harassment investigation in which the allegation has been determined substantiated or unsubstantiated. The review is to be completed within 30 days of the investigation’s conclusion.</p> <p>c) JCPC policy 1400.03 page 35 requires the review team to consist of upper-level management officials, the local PSA Manager, medical and mental health practitioners, with input from line supervisors, and investigators. The Corporate PREA Coordinator may attend via telephone or in person.</p> <p>d) JCPC policy 1400.03 page 35 requires the facility PREA compliance manager maintain copies of all completed PREA After Action Review Reports, and a copy shall also be maintained in the corresponding investigative file.</p> <p>Document Review – Six PREA After -Action Review Report forms were provided for review. One unsubstantiated incident of sexual abuse was reviewed as required and documented in the PREA After -Action Review Report form. Five sexual harassment investigations were reviewed and documented on the PREA After -Action Review Report. All six were completed within 30 days of the investigation’s conclusion. Reviews were conducted by a team that was comprised of the facility investigator/ PCM, Assistant Warden, HSA, mental health staff, Chief of Custody, and Warden. The review covered the five topics in provision (d) and documented the results of the review and any recommendations the team may have.</p> <p>Warden Interview – The Warden said he is part of the incident review team. He said the team consists of the PCM, Investigator, medical staff, mental health staff,</p>

	<p>classification, Assistant Warden and sometimes the GEO PREA Coordinator. The team reviews the investigation report, video evidence and all related documents. The team reviews staff actions and response to the report in addition to the investigation case file. If a local policy or procedure needs corrected, he can approve it. If it is a corporate issue it is sent to the PREA Coordinator.</p> <p>Incident Review Team Interview – The PCM is a member of the incident review team and was interviewed. He said the team consists of the PCM, Investigator, medical staff, mental health staff, classification, Assistant Warden and sometimes the PREA Coordinator. They review all evidence for the case. This may include the review of video in addition to the review of the investigation report and accompanying documents. They look at the mental health referral, offer or use of victim advocate and the retaliation monitoring that may be ongoing. Corrections can be approved locally or must go to corporate for approval.</p> <p>Based on the Interviews, policies and documents reviewed, the facility has demonstrated substantial compliance with all provisions of this standard. By completing incident reviews of sexual abuse and sexual harassment incidents, the facility exceeds this standard.</p>
--	---

115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) JPCPC policy 1400.03 page 35 requires each facility to collect and retain data related to sexual abuse as directed by the corporate PREA Coordinator.</p> <p>b-c) JPCPC policy 1400.03 page 35 states the data shall be aggregated at least annually and is required to include, at a minimum, the data necessary to answer all questions on the most recent version of the Survey of Sexual Violence conducted by the Bureau of Justice Statistics (BJS).</p> <p>Document Review – The 2022 and 2023 GEO PREA Annual Report were reviewed. These reports are found on the GEO PREA webpage. The report provided a summary of PREA reports received during the year. The reports for JPCPC were provided individually along with all other GEO facilities. The incident data was separated by sexual abuse and sexual harassment with numbers for each outcome type.</p> <p>d) GEO policy 5.1.2-A PREA page 23 requires all PREA Compliance Managers to collect data on sexual activity, sexual harassment, and sexual abuse incidents.</p> <p>e) GEO policy 5.1.2-A PREA page 23 requires the facility PCM to create a PREA survey in the GEO PREA Portal for every allegation of sexual abuse, sexual harassment, and sexual activity as required.</p>

	<p>f) GEO policy 5.1.2-A PREA page 23 states GEO will provide the data from the previous calendar year to the Department of Justice no later than June 30th.</p> <p>The PCM said there was no request by the DOJ for a SSV report in the last year.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility is found to meet the provisions of the standard.</p>
--	---

115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) GEO policy 5.1.2-A PREA page 23 states “GEO shall review all data collected in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: 1. Identifying problem areas; 2. Taking corrective action on an ongoing basis; and 3. Preparing an annual report of its findings and corrective actions for each facility, as well as the agency.”</p> <p>PREA Coordinator Interview - The PC said all facilities conduct sexual abuse incident reviews. Problem areas, recommendations for improvement and corrective actions needed are documented and sent to corporate. All data for sexual abuse incidents is entered into a secure portal by the facility PCM. The information is compiled in an annual report.</p> <p>Agency Head Interview - The Executive VP for Secure Services said each facility conducts sexual abuse incident reviews that document an recommended improvements, problems identified or corrective actions. The information is gathered in a secure PREA portal. The information is entered by the facility PCM. The information is part of an annual report that is reviewed and approved by the applicable division authority and the CEO.</p> <p>PCM Interview - The PREA Compliance Manager said the PREA incident data is entered into the PREA portal. All incident reviews are sent to the GEO PREA Coordinator for review. Information for the PREA annual report can be gathered from the PREA portal and incident reviews. The facility annual report is sent to the GEO PREA Coordinator. The auditor found the annual reports on the GEO PREA web page.</p> <p>Document Review - The 2022 and 2023 GEO PREA Annual Report were reviewed. These reports are found on the GEO PREA webpage. The report provided a summary of PREA reports received during the year and a comparison to the data for the last year. The reports for JCPC were provided individually along with all other GEO facilities. The incident data was separated by sexual abuse and sexual harassment with numbers for each outcome type. The report also provides a review of the corrective actions for the last year.</p>

	<p>b) GEO policy 5.1.2-A PREA page 23 states “Such report shall include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of GEO’s progress in addressing sexual abuse.”</p> <p>c) GEO policy 5.1.2-A PREA page 23 states “The annual report shall be approved by the appropriate divisional authority and made readily available to the public upon approval, at least annually through GEO’s website or the client’s website as required by contract.” The reports from 2017 to 2023 were found on the GEO PREA webpage at https://www.geogroup.com/prea.</p> <p>d) GEO policy 5.1.2-A PREA page 23 states “GEO may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.” There was no personal identifying information pertaining to any report of sexual abuse at a facility provided in the reports.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility is found to meet the provisions of the standard.</p>
--	--

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>GEO policy 5.1.2-A PREA page 24 states “Data collected pursuant to this procedure shall be securely retained for at least 10 years or longer if required by state statute. Before making aggregated sexual abuse data publicly available, all personal identifiers shall be removed.”</p> <p>A review of the GEO PREA webpage at https://www.geogroup.com/prea found PREA annual reports from 2017 to 2023.</p> <p>PREA Coordinator Interview – The PC said GEO does collect and aggregate data annually for its facilities through the secure PREA Portal and incident reviews submitted by facilities to him. GEO reviews that data and aggregates it in an annual report. These reports can be found on the GEO website from 2017 to 2023. Personal identifiable information is not included in the annual report.</p> <p>PCM Interview – the PCM said he provides information about PREA incidents in a secure PREA Portal. The portal information is limited to authorized users and requires a login to access it.</p> <p>Based on the information from interviews, policies and documents reviewed, the facility is found to meet the provisions of the standard.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) This is the first DOJ PREA audit for the Joe Corley Processing Center. JCPC completed a DHS PREA audit on August 24, 2024. The audit report is posted on the GEO PREA website.</p> <p>b) GEO has been receiving audits in its facilities every year since 2013. The PREA Coordinator said GEO attempts to have one-third of its facilities audited each year, however the clients may make changes their audit schedule that prevents GEO from meeting that goal. A state DOC could move the GEO facility audit to correct the state’s one-third goal. This is out of GEO’s control.</p> <p>h) This auditor was allowed access to all areas of the facility during the facility tour.</p> <p>i) This auditor was provided with all documents requested, either electronic or hard copy.</p> <p>m) This auditor was allowed to interview inmates in a private area during the onsite audit.</p> <p>n) Inmates were allowed to send confidential correspondence to this auditor. No correspondence was received.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This is the first DOJ PREA audit for the Joe Corley Processing Center. JCPC completed a DHS PREA audit on August 24, 2024. The audit report is posted on the GEO PREA website at https://www.geogroup.com/prea-certification-information/.</p>

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.)	yes
	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.)	na
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.)	yes
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.)	yes
	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).	na
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.)	na
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.)	no
	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.)	no
	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.)	yes
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