

PREA Facility Audit Report: Final

Name of Facility: Heritage Trail Correctional Facility

Facility Type: Prison / Jail

Date Interim Report Submitted: NA

Date Final Report Submitted: 08/04/2025

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: Robert Manville	Date of Signature: 08/04/2025

AUDITOR INFORMATION	
Auditor name:	Manville, Robert
Email:	robertmanville9@gmail.com
Start Date of On-Site Audit:	07/14/2025
End Date of On-Site Audit:	07/16/2025

FACILITY INFORMATION	
Facility name:	Heritage Trail Correctional Facility
Facility physical address:	501 West Main Street, Plainfield, Indiana - 46168
Facility mailing address:	

Primary Contact

Name:	Shane Nelson
Email Address:	snelson@geogroup.com
Telephone Number:	765-593-0111

Warden/Jail Administrator/Sheriff/Director	
Name:	Greg Fizer
Email Address:	gregory.fizer@geogroup.com
Telephone Number:	3176958433

Facility PREA Compliance Manager	
Name:	Shane Nelson
Email Address:	snelson@geogroup.com
Telephone Number:	765-593-0111 Ext. 33
Name:	Michelle Coomer
Email Address:	micoomer@geogroup.com
Telephone Number:	317-391-1268
Name:	Mario Pronzato
Email Address:	mpronzato@geogroup.com
Telephone Number:	317-839-7751 Ext. 51

Facility Health Service Administrator On-site	
Name:	Rachel Thomas
Email Address:	rathomas@idoc.in.gov
Telephone Number:	3172949254

Facility Characteristics

Designed facility capacity:	916
Current population of facility:	855
Average daily population for the past 12 months:	860
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Men/boys
In the past 12 months, which population(s) has the facility held? 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:	21-60
Facility security levels/inmate custody levels:	1-O, 1-R, 2-I
Does the facility hold youthful inmates?	No
Number of staff currently employed at the facility who may have contact with inmates:	162
Number of individual contractors who have contact with inmates, currently authorized to enter the facility:	36
Number of volunteers who have contact with inmates, currently authorized to enter the facility:	40

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:	J David Donahue
Email Address:	ddonahue@geogroup.com
Telephone Number:	5618930101

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

Facility AUDIT FINDINGS	
Summary of Audit Findings	
<p>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.</p> <p>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.</p>	
Number of standards exceeded:	
3	<ul style="list-style-type: none"> • 115.17 - Hiring and promotion decisions • 115.53 - Inmate access to outside confidential support services • 115.86 - Sexual abuse incident reviews

Number of standards met:	
42	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-07-14
2. End date of the onsite portion of the audit:	2025-07-16

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:	Indiana Coalition Against Domestic Violence

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	916
15. Average daily population for the past 12 months:	860
16. Number of inmate/resident/detainee housing units:	10
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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	860
25. 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:	25
26. 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:	1
27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	1
28. 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:	1
29. 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:	5
30. 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:	8

<p>31. 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>0</p>
<p>32. 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>0</p>
<p>33. 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>12</p>
<p>34. 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>35. 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>The facility does not have a restrictive housing unit or way of segregating offenders.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>36. 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>152</p>
<p>37. 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>40</p>

38. 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:	34
39. 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:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	19
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	I interview offenders from each of the housing units.
43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No

44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	11
<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>	
47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	2
48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	1
49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	1

<p>50. 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>1</p>
<p>51. 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>2</p>
<p>52. 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>2</p>
<p>53. 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>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>I reviewed the at-risk log, intake screening instrument database, and requested the Transgender Care Committee's reports for the last 12 months. I also interviewed members of the Transgender Care Committee, mental health staff, and offenders who were gay. I asked each person interviewed if they knew of any transgender offenders in the facility at this time.</p>

<p>54. 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>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>I reviewed the at-risk log, intake screening instrument database, and investigative files. I interviewed the PREA compliance manager, intake staff, facility administrator, medical and mental health staff, and all said they did not have anyone in the facility who made an allegation of sexual abuse.</p>
<p>55. 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>2</p>
<p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility does not have a Restrictive housing Unit or any means to separate offenders. If separation is required, the facility must relocate the offenders to the Indiana Department of Corrections facility, which is located nearby. In an interview with the facility administrator, he indicated he had not transferred any offender due to the risk of sexual victimization.</p>
<p>57. 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>58. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>14</p>
<p>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>

<p>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>No text provided.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>17</p>
<p>63. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>65. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>66. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><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)</p>

67. 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 checked="" type="checkbox"/> Other
If "Other," provide additional specialized staff roles interviewed:	Grievance Coordinator Mail Room staff Facility Compliance Manager Classification Supervisor Volunteer Coordinator Staff Training Officer
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	2
b. 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
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	5

<p>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</p>	<p><input type="checkbox"/> Security/detention</p> <p><input type="checkbox"/> Education/programming</p> <p><input checked="" type="checkbox"/> Medical/dental</p> <p><input type="checkbox"/> Food service</p> <p><input checked="" type="checkbox"/> Maintenance/construction</p> <p><input type="checkbox"/> Other</p>
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<p>70. Provide any additional comments regarding selecting or interviewing specialized staff.</p>	<p>No text provided.</p>
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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.

<p>71. Did you have access to all areas of the facility?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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Was the site review an active, inquiring process that included the following:

<p>72. 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)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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73. 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
74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
75. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

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

The facility is a minimum/medium security facility with the mission to prepare offenders for release. The center is considered a level A mental health facility, which excludes any mental health offenders. It is a G for medical, which is a classification that the person has no major medical conditions. During the tour of the facility, several younger offenders were noticed and asked about their length of stay and prior experience in a correctional facility. Based on the random questions, I determined I should interview first-time offenders.

Offenders who transfer or have been in other prisons tend to have received PREA training on several occasions.

During the site review, the locations of cameras and mirrors, room layout, restrooms, and the placement of PREA posters and information were observed. Facility Notices in English and Spanish provided to the facility during the Pre-Onsite Audit Phase were found displayed in various locations throughout the facility. PREA reporting information and other PREA posted information are in both English and Spanish and posted in all housing units and numerous locations throughout the facility. Reminders of opposite gender announcements are stenciled near the entries of housing units. The medical area had a wraparound curtain to provide privacy for examinations. There were two holding rooms in the medical areas. One was being utilized for storing wheelchairs, and other medical support devices.

The speed dial offender telephone was tested in several living units. Inmates are not required to use a PIN to contact the Indiana Coalition Against Domestic Violence. However, they were required to use a PIN to contact the Indiana Department of Corrections TIPS Line. The facility poster or reporting to an outside entity indicated the offender and write to the Indiana Ombudsman. The mail room staff indicated that letters to the Ombudsman are not censored. She noted that they place a stamp on the envelope and mail it without

documenting any information. Offenders do not have to put their return address on this letter.

During the site review, the auditors spoke informally to offenders questioning them about their overall knowledge of the agency's zero-tolerance policy and methods of reporting available to them. Several offenders were able to show me how to utilize the telephone system. Most offenders were talkative and could articulate the agency policies about zero-tolerance. When asked how staff would manage an offender who claims to be in imminent danger of sexual assault, since there is no segregation unit, staff indicated they would stay with the resident and take him to the observation room in medical. They would follow the protocol, which included not brushing their teeth, not taking a shower, and not defecating. They would also notify the major and medical staff, as they would escort the offender to the observation room. All showers have curtains for privacy. All toilets had partitions and walls in front of the toilet area.

At that time, the offenders are requested to sign an acknowledgement of the PREA training. Following the PREA training, the offender goes into a private office where one of the facility's case managers reviews the information with the offender and administers the Indiana Department of Corrections risk assessment.

Offenders stated they are not seen by staff when showering or using the restroom. Most offenders reported that females announce their presence upon entering their living unit and avoid the area where they shower and use the toilet when offenders occupy it.

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>77. 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>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>New Hire and Training Acknowledgement NCIC 4</p> <p>Accurate background checks 3</p> <p>Contractor training and background checks 2</p> <p>Volunteer training and background checks 2</p> <p>PRE Employment questionnaire 4</p> <p>GEO PREA questionnaire on Applications 5</p> <p>Specialized Medical and Mental Health acknowledgements 12</p> <p>Transgender Care Committee reviews 0</p> <p>Unannounced Rounds 5</p> <p>Investigative files 3</p> <p>Notification of Investigation 4</p> <p>Incident Review Team reports 1</p> <p>Detainee screening forms 12 Reassessment 9</p> <p>Mental Health Referrals 4</p> <p>Detainee orientation and comprehensive education 12</p> <p>New Hire training acknowledgement 16</p> <p>Annual Training 9</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.

79. 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	0	0	0	0
Staff-on-inmate sexual abuse	2	1	1	1
Total	2	1	1	1

80. 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	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	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.

81. 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	1	0	0	0	0
Total	1	0	0	0	0

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

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

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.

83. 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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:

2

<p>86. 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>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>88. Did your sample of INMATE-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 inmate-on-inmate sexual abuse investigation files)</p>
<p>89. Did your sample of INMATE-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 inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
<p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>a. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>The facility did not have an allegation of sexual abuse in the PREA cycle. This was verified through a review of the GEO Group Annual Reports and interviews with the facility administrator and investigator.</p>
<p>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" 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>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT 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 inmate-on-inmate sexual harassment investigation files)</p>

<p>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT 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 inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT 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 harassment investigation files)</p>
<p>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT 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 harassment investigation files)</p>
<p>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>One investigative file was reviewed, which was determined to be consensual sexual activity. This file included a thorough investigation and a finding of consensual sexual activity utilizing the preponderance of the evidence.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

102. 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.

- Yes
 No

Non-certified Support Staff

103. 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

108. 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>Evidence relied upon in making the compliance determination.</p> <p>Heritage Trail Correctional Facility Site Specific Policy and Procedure Manual 17.001 PREA Sexual Assault Prevention and Management.</p> <p>Appendix A 1700.01 PREA Coordinated Response Plan</p> <p>Organizational Chart</p> <p>Offender Handbook PAQ</p> <p>Interviews</p> <p>Facility Administrator</p> <p>GEO PREA Coordinator</p> <p>Facility PREA Compliance Manager</p>

115.11 (a):

PAQ Requires:

1. The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract.
2. The facility has a policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment.
3. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment.
4. The policy includes sanctions for those found to have participated in prohibited behaviors.
5. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of detainees

The facility provided the Heritage Trail Correctional Facility Site Specific Policy and Procedure Manual, Section 17.001, PREA: Sexual Assault Prevention and Management.

Policy and procedure manual 17.001 and Appendix A-

Policy 1700.01 mandates that it is the policy of the Heritage Trail Correctional Facility (HTCF) to provide a safe and secure environment for all staff, volunteers, contractual staff, visitors, official visitors, and incarcerated individuals; and to maintain a program for the prevention of sexual abuse and sexual harassment in the facility.

HTCF mandates zero tolerance towards all forms of Sexual Abuse and Sexual Harassment in its facility. It is the policy of HTCF that sexual conduct between Employees, Volunteers, or Contractors and incarcerated individuals, regardless of consensual status, is prohibited and subject to administrative and criminal disciplinary sanctions. This prohibition includes conversations or correspondence of a romantic or sexual nature. All Employees, Contractors, and Volunteers are expected to have a clear understanding that the HTCF strictly prohibits any sexual relationship with incarcerated individuals. This shall be considered a serious breach of the Standards of Employee Conduct, Volunteer agreements, as well as vendor, service, and Contractor agreements, and these relationships will not be tolerated.

Engaging in a romantic and/or sexual relationship with incarcerated individuals may result in employment termination and/or termination of the Contractual or Volunteer status, and/or criminal charges. Program employees must take prudent measures to ensure the safety of incarcerated individuals, Employees, Contractors, and Volunteers.

Retaliation against incarcerated? individuals or Employees for filing a complaint will not be tolerated.

By this policy, all Employees, Contractors, and Volunteers have an affirmative duty to report all allegations or knowledge of Sexual Abuse, Sexual Harassment, romantic, or sexual contact that takes place within any GEO Facility or program. All cases of alleged sexual conduct shall be thoroughly investigated. Upon Substantiation of any allegations of sexual conduct, appropriate disciplinary actions will be taken against Employees, Contractors, or Volunteers, including possible termination and prosecution.

Policy 1700.01, Section II, provides general definitions used in implementing the PREA standards throughout the facility.

Appendix A 1700.01, the PREA Coordinated Response Plan provides written guidelines to staff responding to allegations and occurrences of sexual abuse, sexual harassment, and sexual activity within the facility.

The institution meets the standards by implementing all the programs it has, ensuring that both detainees and staff understand its position on zero tolerance. Yearly, GEO conducts a PREA review of the facility to determine the level of compliance and to identify concerns that need to be addressed by the PREA compliance manager and the facility administrator.

115.11 (b):

The PAQ requires that the agency employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all its facilities. The agency shall employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.

GEO employs an upper-level, agency-wide PREA Coordinator at the corporate level. The agency's organizational chart depicts the position within the agency. The PREA Coordinator oversees the agency's efforts to comply with the PREA standards in all of GEO's facilities. GEO has a team of staff that supports the PREA coordinator's efforts in meeting all PREA standards. The administrative team meets regularly to develop strategies that foster a culture of safety for both staff and detainees. The PREA Coordinator's team is deeply knowledgeable about PREA and best practices to carry out the Agency's approach to prevent, detect, and respond to sexual abuse or sexual allegations.

115.11 (c):

The PAQ requires that, where an agency operates more than one facility, each facility shall designate a PREA compliance manager with sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.

HTCF Policy and Procedure Manual 1700.01 ensures that the facility has a PREA Compliance Manager with sufficient time and authority to coordinate the facility's PREA efforts. The facility's organizational chart illustrates the PREA Compliance

	<p>Manager’s position within the facility. At HTCF, the PREA compliance manager reports to the Human Resources Manager. HTCF provides support staff to assist the PREA compliance manager with their tasks in carrying out the PREA mandates from GEO. The administrative team meets regularly to develop strategies that foster a culture of safety for both staff and detainees.</p> <p>Both the GEO Group PREA Coordinator and Facility Compliance Manager advised that they have sufficient time and authority to coordinate efforts to comply with PREA standards. The facility provides additional support for PREA-related investigations, policy reviews, mock audits, and follow-up to the corporate PREA coordinator’s office with questions or concerns.</p> <p>Compliance was determined by reviewing the agency's organization chart, policies, and facility policies, as well as staff and detainee training orientation PowerPoint presentations, posters, the offender manual, and interviews with staff, contractors, volunteers, and detainees. These further provided evidence of compliance with this standard.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.12	Contracting with other entities for the confinement of inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determination</p> <p>Heritage Trail Correctional Facility Contract Extension</p> <p>Statement of Fact</p> <p>Interview</p> <p>PREA Coordinator</p> <p>GEO is a private provider and does not contract for the confinement of its detainees; therefore, this standard does not apply to this facility. The contracting statement of work requires Heritage Trail Correctional Facility to remain in full compliance with PREA standards.</p> <p>In an interview with the PREA coordinator for GEO, he indicated that the agency does not contract with any outside entity for housing detainees. If the facility is operating at overcapacity, GEO would notify the contracting agency and document its current capacity.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>

115.13	Supervision and monitoring
	<p data-bbox="256 188 959 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="256 266 544 300">Auditor Discussion</p> <p data-bbox="256 344 1139 378">Evidence relied upon in making the compliance determination</p> <p data-bbox="256 412 1235 445">GEO Policy 5.1.2-A Sexual Abuse/Assault Prevention and Intervention</p> <p data-bbox="256 479 437 512">Staffing Plan</p> <p data-bbox="256 546 676 580">9/9/2024 Annual Assessment</p> <p data-bbox="256 613 639 647">Review Facility Schematics</p> <p data-bbox="256 680 655 714">Corporate Annual Summary</p> <p data-bbox="256 748 1023 781">Interviews Contracting Positions Facility Administrator</p> <p data-bbox="256 815 644 848">PREA Compliance Manager</p> <p data-bbox="256 882 325 916">PAQ</p> <p data-bbox="256 949 453 983">115.13 (a)(b):</p> <p data-bbox="256 1016 1474 1632">The agency shall ensure that each facility it operates shall develop, document, and make its best efforts to comply regularly with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect offenders against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, facilities shall take into consideration: (1) Generally accepted detention and correctional practices; (2) Any judicial findings of inadequacy; (3) Any findings of inadequacy from Federal investigative agencies; (4) Any findings of inadequacy from internal or external oversight bodies; (5) All components of the facility’s physical plant (including “blind-spots” or areas where staff or offenders may be isolated); (6) The composition of the offender population;(7) The number and placement of supervisory staff; (8) Institution programs occurring on a particular shift; (9) Any applicable State or local laws, regulations, or standards;(10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and (11) Any other relevant factor.</p> <p data-bbox="256 1666 1474 1789">The agency requires each facility it operates to develop, document, and make its best efforts to comply regularly with a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect offenders against abuse.</p> <p data-bbox="256 1823 1442 1901">Since August 20, 2012, or the last PREA audit, whichever is later, the average daily number of offenders: 852</p> <p data-bbox="256 1935 1458 2013">The annual average daily number of staff utilized to develop a staffing plan was 852 offenders.</p> <p data-bbox="256 2047 1458 2080">In circumstances where the staffing plan is not complied with, the facility documents</p>

and justifies all deviations from the plan. The facility PAQ indicated that the center has not deviated from the staffing plan in the last 12 months.

The center provided a staff plan for 2025, a staffing plan assessment, and GEO Corporate Policy 5.1.2-A Sexual Abuse/Assault Prevention and Intervention

GEO Policy 5.1.2-A Sexual Abuse/Assault Prevention and Intervention mandates that each department supervisor shall evaluate the department's operations and propose operational improvements within allotted resources. Consideration shall be realistic coverage for all essential posts and coverage required for training, days off, annual and sick leaves, and other authorized and unauthorized absences.

The facility administrator shall regularly evaluate the facility staffing needs to ensure the most efficient utilization of manpower resources. This evaluation shall include consideration of existing needs, staff suggestions and recommendations, as well as current and projected plans and goals of the facility. Relief factors such as holidays, regular days off, sick leave, etc., shall be included in the formula used to determine staff.

Policy requires the facility to review the staffing plans on an annual basis. Interviews with the facility administrator and executive staff revealed compliance with the PREA, and that other safety and security issues are always a primary focus when they consider and review their respective staffing plans. The facility has a Staffing Report that is developed for each pay period. The facility provides the bimonthly reports that include mandatory post and holdover staffing to meet the mandatory posts. This report also includes the number of positions authorized, the number filled, the number vacant, recruitment efforts, and any staffing concerns during the pay period. The Facility Administrator meets weekly with his executive staff, including the Chief of Security, Lieutenant, and the Human Resource Manager (HRM), to address staffing issues as they relate to the PREA.

Interviews with the facility administrator and executive staff revealed compliance with the PREA, and that other safety and security issues are always a primary focus when they consider and review their respective staffing plans.

The staffing plan is based on the following criteria:

- Generally accepted detention and correctional practices.
- Judicial findings of inadequacy.
- Findings of inadequacy from Federal investigative agencies.
- Findings of inadequacy from internal or external oversight bodies.
- All components of the facility's physical plant.
- The composition of the offender population.
- The number and placement of supervisory staff.

- Institution programs occurring on a particular shift.
- Applicable State or local laws, regulations, or standards.
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and – Other relevant factors.

The institution has been provided with all the necessary resources to support the programs and procedures to ensure compliance with the PREA standards. The audit included staff interviews and rosters. Supervisory and Administrative staff members routinely make unannounced rounds. These rounds are documented in Unit Logs located in each housing unit.

There have been no judicial findings of inadequacy from federal investigative agencies or findings of inadequacy from internal or external oversight bodies relevant to this standard. All essential posts are filled each shift, and no essential posts are kept open for savings. When programs are offered, staffing is increased to provide additional supervision. There has been no deviation from the staffing plan based on interviews with the facility administrator and PAQ.

115.13 (c):

The PAQ requires that whenever necessary, but no less frequently than once each year, for each facility the agency operates, in consultation with the PREA coordinator required by § 115.11, the agency shall assess, determine, and document whether adjustments are needed to: (1) The staffing plan established under paragraph (a) of this section; (2) The facility's deployment of video monitoring systems and other monitoring technologies; and (3) The resources the facility has available to commit to ensure adherence to the staffing plan.

The facility provided policy GEO Policy 5.1.2-A Sexual Abuse/Assault Prevention and Intervention mandates that whenever necessary and no less than annually, the staffing plan is reviewed and documented during the Annual PREA Facility Assessment. This completed form is submitted to the Corporate PREA Coordinator and the Corporate Divisional Vice President for signature and approval of any recommendations made to the established staffing plan to include the deployment of video monitoring systems and other monitoring technologies or the allocation of additional resources to maintain compliance with the plan.

In an interview with GEO's PREA Coordinator, he reported being consulted regarding assessments or adjustments to the staffing plan through incident reviews of substantiated and unsubstantiated allegations and through the Annual PREA Facility Assessments he reviews and approves for each of the agency facilities annually. The latest staffing assessment was on September 9, 2024.

115.13 (d):

Each agency operating a facility shall implement 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. Such policy

and practice shall be implemented for night shifts as well as day shifts. Each agency shall have a policy to prohibit staff from alerting other staff members that these supervisory rounds are occurring, unless such an announcement is related to the legitimate operational functions of the facility.

According to facility policy and practice requiring department heads, facility executive staff, and intermediate and higher-level custody supervisors conduct and document unannounced rounds on all shifts within their respective areas to identify and deter employee sexual abuse and sexual harassment. Policy also mandates that other staff are prohibited from telling other staff when supervisors are making unannounced rounds. The review of the Institution Duty Officer (IDO) unannounced PREA rounds.

The facility housing unit logs confirmed that intermediate-level or higher-level supervisors, including shift supervisors and department heads, conduct and document such visits throughout the institution, during the day, at night, and on the weekends. Additionally, the intermediate staff were interviewed. Each shift supervisor visits areas of the facility during the day, evenings, and weekends. The Shift

The supervisor documents the visits in logbooks located as you enter the housing units.

The midnight staff Lieutenant and the facility major were interviewed concerning unannounced rounds. Each indicated that rounds are conducted on each shift and each week there is a PREA round conducted. Staff are not allowed to tell other staff when the intermediate staff are conducting rounds. The Lt. indicated he changes the time and direction of his unannounced rounds. The Major indicated that he goes in different doors at different time when conducting his rounds.

Staff members are prohibited from alerting other employees regarding unannounced rounds. Interviews with housing unit officers also confirmed that supervisory staff document these visits on the unit log. The auditor reviewed logbooks during the tour and found multiple signs in documentation on each shift. While touring the control room, the control room officers showed her computerized PREA rounds documentation. The facility provided a page on each housing unit's logbook for a 24-hour period of time.

Facility Administrator Interview: We are mandated by contract to maintain a minimum mandatory post that is filled by able alert staff at all times. We accomplish this by paying overtime, holding over staff, and bringing in staff from other GEO facilities to man essential non-direct care staff such as front entrance, roving perimeter patrol, control room operator, and camera observers.

Compliance Manager: We conduct an annual assessment that is reviewed by the GEO regional Director, the vice president of operations, and the GEO PREA coordinator.

Compliance was further determined by staff interviews conducted during the tour of all areas of the facility and interviews with the Chief of Security, Facility Administrator, PCM, Human Resource Manager and Correctional Staff; reviews of documented

	<p>staffing rosters, daily supervisory checks, and facility workforce meeting records; pay period staffing reports and the examination of the video monitoring system. A comprehensive tour of the facilities was conducted during the audit that included looking for blind spots, reviewing camera coverage, and available staff in areas where offenders are assigned. A detailed review of the cameras was conducted by the auditor during the on-site tour. It was determined that the additional cameras and mirrors have enhanced the facility and reduced the blind spots where possible. The facility has made additional funding available to enhance recruitment of staff.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.14	Youthful inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <p>GEO Cooperate Policy 5.1.2-A</p> <p>Contract for Service</p> <p>Statement of Fact</p> <p>Interviews:</p> <p>Facility Administrator</p> <p>Classification Supervisor</p> <p>Medical and Mental Health staff</p> <p>115.14 (a)(b)(c)</p> <p>The PAQ requires that a youthful inmate shall not be placed in a housing unit in which the youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters.</p> <p>The facility prohibits placing youthful inmates in a housing unit in which a youthful inmate will have sight, sound, or physical contact with any adult inmate through use of a shared dayroom or other common space, shower area, or sleeping quarters</p> <p>The facility has housing units to which youthful inmates are assigned that provide sight and sound separation between youthful and adult offenders in dayrooms, common areas, showers, and sleeping quarters.</p>

	<p>The facility places youthful inmates in the same housing unit as adults.</p> <p>Youthful inmates who are placed in the same housing unit as adults have sight, sound, or physical contact with any adult inmate through use of shower area, sleeping quarters, shared dayroom, or other common space.</p> <p>The facility maintains sight, sound, and physical separation between youthful inmates and adult inmates in areas outside housing unit.</p> <p>The agency always provides direct staff supervision in areas outside housing units where youthful inmates have sight, sound, or physical contact with adult inmates.</p> <p>The facility documents the exigent circumstances for each instance in which youthful inmates' access to large-muscle exercise, legally required education services, and other programs and work opportunities was denied.</p> <p>The facility provided a statement of fact and interview with classification supervisor, medical and mental health staff.</p> <p>Heritage Trail Correctional Facility does not house youthful detainees.</p> <p>Compliance was determined by reviewing the Contract for Services, policy, and interviews with intake staff, the facility administrator, and the agency designee. The facility administrator provided a statement that the facility is not allowed to house youthful offenders.</p> <p>Facility Administrator: All of our offenders are vetted by the Indiana Department of Corrections before coming to this facility. By contract, we are not authorized to house youthful offenders.</p> <p>Medical staff interviews indicated they review all detainees authorized to accept during the medical intake and ask detainees their age. If a offender were to indicate they were under the age of 18, we would notify the center administrator and place the youth in an isolated medical room until they could be removed from the facility.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.15	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determination</p> <p>HTCF Policy and Procedure Manual 17.001 PREA Sexual Assault Prevention and</p>

Management.

Appendix A 1700.01 PREA Coordinated Response

GEO Policy 5.1.2-A Sexual Abuse/Assault Prevention and Intervention

Interview with

Random Staff

Random Offenders

115.15 (a)(b)(c)(d):

The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.

The PAQ requires that, as of August 20, 2015, or August 20, 2017, for a facility whose rated capacity does not exceed 50 inmates, the facility shall not permit cross-gender pat-down searches of female inmates, absent exigent circumstances. Facilities shall not restrict female inmates' access to regularly available programming or other out-of-cell opportunities to comply with this provision.

All staff are required to document all cross-gender strip searches and cross-gender visual body cavity searches.

The facility shall implement policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical 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. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an inmate housing unit.

The facility provided policies, including the HTCF Policy and Procedure Manual 17.001 and GEO Policy 5.1.2-A, and conducted interviews with randomly selected staff and offenders.

HTCF Policy 17.001 mandates

1. The Facility shall prohibit cross gender strip searches except in Exigent Circumstances
2. Cross Gender visual body cavity searches (search of the anal or genital opening) are prohibited except in Exigent Circumstances and shall only be performed by off-site Medical Practitioners.
3. The Facility shall prohibit the pat search of Transgender Incarcerated individuals by male staff and shall be provided with a Search, Shower, Pronoun Preference form documenting their search preference.

a. The Facility shall not prohibit access to programming or work assignments in order to comply with this provision

4. The Facility shall document and justify all cross-gender pat searches of Transgender Female Incarcerated individuals by male staff, cross-gender strip searches, and cross-gender visual body cavity searches of Incarcerated individuals.

5. It is the policy of this Facility, as outlined in the Incarcerated Individual Handbook, that Incarcerated individuals must remain fully clothed anytime outside of the restroom area to prevent opposite gender viewing of the Incarcerated individual in a state of undress except in Exigent Circumstances or instances where the viewing is incidental to routine security checks.

6. It is the policy of the Facility that all female staff announce their presence when entering a housing unit or any area where the incarcerated individual may be in a state of undress (restroom areas). The announcement is to be documented in the housing unit log and made in a manner that makes all incarcerated individuals in the unit aware of their presence at the start of their shift and any time they return following a significant absence from the unit (lunch break).

7. Any occasion where an incarcerated individual must be placed on constant monitoring shall be provided with visual supervision by a security staff member of the same gender.

GEO Policy 5.1.2-A and HTCF Policy 17.001 enable offenders to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their Breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. The living area showers have curtains that provide privacy for the offender while showering. Toilet areas have partitions with doors to allow offenders to use the restroom without being viewed by staff. The medical area has a wraparound curtain for privacy during examinations. All toilets in the living units have partitions and a wall in front of the bathroom to provide privacy. All other areas reviewed during the tour had partitioned or single toilets with doors to provide privacy. All residents stated they can shower, use the toilet, and change clothes without being seen by staff members.

During the tour of the facility, it was noted that all showers had curtains and all toilets had partitions that did not allow staff to see the complete body in the restroom area. There was one toilet noted during the tour that needed a partition or small curtain to provide additional privacy at the first toilet in three of the housing units. The facility completed that task during the onsite audit.

The cameras were reviewed. Several of the cameras in the restroom area had (e.g., pixelation or blurring or tape to obscure cross-gender viewing of confined persons in a state of undress.

The facility has implemented a policy that requires all staff of the opposite gender working in the units to announce themselves before walking the range, allowing offenders the opportunity to prepare themselves from a privacy perspective.

Offenders interviewed acknowledged they were allowed to shower, dress, and use the toilet without being viewed by staff of the opposite gender. Postings are located throughout the living units, where female staff are assigned to work.

Random Offender Interviews: Eighteen of the thirty offenders interviewed indicated that staff announce their presence when entering their living units. Eight of the offenders stated that staff don't announce their presence, and four of the residents indicated that some of the female staff do announce their presence. All offenders indicated they can shower, change clothing, and use the toilet without being seen by staff of the other gender. They all indicated there were partitions and curtains around the showers and bathrooms, and the facility did not have any group showers.115.15 (e):

The PAQ requires that the facility shall not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it may be determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

Policy and Procedure Manual 17.001 requires

1. Facility intake staff shall seek to identify incarcerated individuals who are Transgender or Intersex upon receipt from the Department. Staff should seek to determine, based on information available from the Department, the incarcerated individual, and as developed by staff, the relevant details.
2. Staff shall discreetly place the Incarcerated individual in a holding area to provide for the Incarcerated individual's safety and to provide the Incarcerated individual with some measure of privacy pending further review.
3. Facility staff are prohibited from searching or physically examining an incarcerated individual to determine genital status. If the genital status is unknown, it may be determined during private conversations with the incarcerated individual, a review of medical records, or by learning that information as part of a broader medical examination conducted in private by a Medical Practitioner.
4. Security staff shall receive training to conduct cross-gender pat-down searches and searches of Transgender and Intersex Incarcerated individuals in a professional and respectful manner.
5. Incarcerated individuals identifying as Transgender or Intersex shall be provided with the opportunity to determine the gender of staff with whom they would feel most comfortable searching. The incarcerated individual must complete the Statement of Search Preference form and be prepared to present this form anytime the incarcerated individual is directed to be searched.

Staff interviews: All staff have received training in conducting cross-gender and transgender pat searches within the last 12 months. All were aware that their agency

	<p>prohibits the search of a transgender or intersex offender to determine their sexual gender</p> <p>115.15 (f):</p> <p>The PAQ requires that the agency shall train security staff in how to conduct cross-gender pat-down searches and searches of transgender and intersex inmates, professionally and respectfully, and in the least intrusive manner possible, consistent with security needs.</p> <p>All staff at HTCF receive training on how to conduct cross-gender pat searches and searches of transgender and intersex offenders professionally and respectfully. Staff receive training on Limits to cross-gender viewing and searches. The lesson plan for this training was provided for review. Staff sign a PREA Basic Acknowledgement form, acknowledging receipt and understanding of the training they have received. A review of random staff training records and interviews with security staff revealed that staff are receiving this training at pre-service and annually. Interviews with staff confirmed that they were aware of the prohibition of visual body cavity or strip searches of offenders of a different sex except in exigent circumstances.</p> <p>Staff receive training yearly utilizing the GEO In-Service PPT, which includes an illustration of how to conduct cross gender pat down searches and searches of transgender and intersex offenders professionally and respectfully. According to the PAQ, all staff have received training in the last 12 months.</p> <p>Interviews with the Classification Supervisor revealed that transgender offenders would be escorted to a private area and meet with the Transgender Care Committee. At that time, the team and the offender would discuss housing, showering, and pat-down procedures. The offender will be informed about the various housing options available at the facility and our recommendations for suitable accommodations. A consensus will be made during this meeting. The offender will then be allowed to determine if they are showered when no one else is in their room or a private area, such as intake, and then they may request the gender of the staff member who will conduct their pat searches.</p> <p>All staff interviewed indicated that it is against the policy to search a transgender or intersex offender to determine their genitalia. All staff stated they had been trained on cross gender and search of transgender offenders and how to communicate effectively and professionally with transgender, gay, or intersex offenders. Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.16	Inmates with disabilities and inmates who are limited English proficient
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determination

GEO Policy 5.1.2-A Sexual Abuse/Assault Prevention and Intervention

PREA Posters English and Spanish,

PREA Video Script

Offender Handbook Offender

PREA Brochure

TTY Tablet

Contract with Big Language Solutions PAQ

Interviews

Limited English Proficiency offenders

Low Vision offender

Hard-of-Hearing offender

Random Staff Intake staff

115.16 (a)

PAQ requires that the agency establish procedures to provide disabled offenders 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.

The facility provided GEO Policy 5.1.2-A, PREA Posters, PREA Video Script, Offender Handbook, Offender PREA Brochure, TTY Tablet, and Contract with Big Language Solutions.

GEO Policy 5.1.2-A mandates that the facility shall not discriminate against offenders with known disabilities and shall provide reasonable accommodations to ensure access to programs, activities, and services in accordance with the Americans with Disabilities Act and the provisions established in this policy. The facility has several bilingual staff members, and interviews with residents and staff indicated they knew staff members who were bilingual and utilized their services in communicating with the offender population. Through policy and practice, the facility staff ensures that offenders with all disabilities listed in 115.16a have an equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The facility has TTY machines for individuals who are hard of hearing. The auditor utilized the language.

115.16 (b)(c):

The agency has established procedures to provide inmates with limited English proficiency 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.

The agency shall not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under § 115.64, or the investigation of the inmate's allegations

The facility provided policy 5.1.2, staff training, a list of bilingual staff, a Tablet, posters in English and Spanish, a contract for Language Line, and targeted offender interviews.

The targeted offenders interviewed stated they were instructed about PREA compliance and felt safe from sexual abuse. All PREA-related information (written information), including postings, Brochures, and handouts, is available in English and Spanish. The facility offers translation services and provides written materials in multiple languages. Staff may also read information to offenders when necessary. Agency and facility policies prohibit offenders from being relied on as readers or any type of assistants, except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the offender's safety. The facility maintains a list of staff who are bilingual. During the onsite audit, there was one hard-of-hearing offender, one low-vision offender, one cognitively disabled offender, two LEP offenders, and two disabled offenders interviewed. All offenders indicated that they were aware of PREA, had received training on PREA, and were aware that the auditor would be present at the facility during the onsite audit. The facility provided a list of staff who were Spanish-speaking. The language line staff were extremely fluent and provided the appropriate service to the auditor. The LEP offenders included one Korean and one Spanish-speaking offender.

GEO Policy 5.1.2-A mandates that the agency shall not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under § 115.64, or the investigation of the inmate's allegations.

Agency policy prohibits the use of inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations.

Six of the 14 staff members interviewed indicated that they would allow an offender to utilize another offender that he trusted to provide interpretive services when reporting an allegation of sexual abuse or sexual harassment. Eight of the staff members interviewed were aware of the Language Line; however, they had not utilized the system. A corrective action plan was implemented, and all staff were

	<p>retrained on the policy that HTCF does not allow staff to use bilingual offenders to serve as interpreters for other offenders to make reports of sexual abuse or sexual harassment.</p> <p>Site Review</p> <p>All posters were found to be in English and Spanish. TTY phones are in several living units.</p> <p>The agency head indicated that, across all of GEO's facilities, we have developed PREA education materials in various formats to ensure that individuals with disabilities and those who are limited English proficient can equally benefit from the PREA program. We have developed posters, pamphlets, videos, and large print materials, as well as provided TTY phones, access to language lines, and designated staff interpreters to ensure that we can effectively communicate the PREA procedures and available services to the individuals we house. Facilities are prohibited from relying on inmates to do this for us. GEO also reaches out to community-based resources (i.e., local colleges or organizations) that might be willing to assist us.</p> <p>Based on this analysis, the facility was not substantially compliant with this provision, and corrective action was required.</p> <p>Six of the staff interviewed indicated they would report to make a report for an offender who did not speak English. The facility has retrained all staff so that staff can utilize the language line to offer offenders the ability to report in their native language.</p> <p>Based on this analysis, the facility has completed the retraining of staff and is now substantially compliant with this provision; therefore, corrective action is no longer required.</p>
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115.17	Hiring and promotion decisions
	<p>Auditor Overall Determination: Exceeds Standard</p> <p>Auditor Discussion</p> <p>The following policies, directives, interviews, and documentation were reviewed in determining compliance with this standard:</p> <p>HTCF Policy 17.001</p> <p>GEO online application form</p> <p>PREA annual disclosure waiver</p> <p>PREA promotional disclosure waiver PAQ</p>

Indiana Department of Corrections Background Checks

PREA questionnaire for New Hire, Promotions, and annual performance evaluations

Accurate Background checks

115.17 (a)(b):

The PAQ indicates:

Agency policy prohibits hiring or promoting anyone who may have contact with offenders and prohibits enlisting the services of any contractor who may have contact with offenders who: (1) 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); (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

The agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

The agency policy provided

HTCF Policy 17.001

When the hiring manager identifies a candidate for the job, the terms of the job offer will be submitted to the hiring authority for approval. The HR representative will communicate the offer to the candidate in writing (contingent upon successful background checks and drug screen), negotiate necessary terms (as approved by the hiring authority), and schedule a mutually convenient start date.

HTCF Policy 17.001 mandates

a. The Facility will prohibit the hiring or promotion of any person who has engaged in, been convicted of, or has been civilly or administratively adjudicated for engaging in Sexual Abuse in a confinement setting or the community.

b. The Facility will carefully consider any incidents of Sexual Harassment in determining whether to hire or promote any individual who may have contact with Incarcerated individuals.

c. A comprehensive criminal background check will be conducted before an offer of employment or promotion and annually thereafter. Additionally, the facility will conduct a "PREA Background Check" to obtain information from prior institutional employers on substantiated allegations of Sexual Abuse or any resignation pending an investigation of an allegation of Sexual Abuse.

d. The Facility will directly ask each applicant about previous Sexual Abuse as part of

its hiring process. This is completed on the employment application. Staff members eligible for promotion will be asked about sexual abuse as part of the promotion process. They will complete the PREA Disclosure and Authorization Form for Promotions/PREA-Related Positions. Existing staff will be directly asked about Sexual Abuse during their Annual Performance Evaluation and will be required to complete the P REA Disclosure and Authorization Form-Annual Performance Evaluation.

Background checks are done on all employees, contractors, and volunteers. Background checks (FCIC/NCIC) are conducted on all new hires. The department is connected as a level II employer, and any arrest is provided to the department upon entry into the system. All volunteer and contract re-checks are completed annually and are up to date.

Interviews with the Human Resource Manager and review of random employee, contractor, and volunteer files were used to verify compliance with this standard. Before transferring to the facility or promotions, the employee's background review is conducted utilizing Accurate Background Checks, and the following questions are answered. These same questions are asked of each staff member during the annual staff appraisal. This was confirmed by the interview with the human resources staff.

1. Have you engaged in sexual abuse in a prison, jail, lockup, community confinement facility, Juvenile facility, or other institution? (Please note that sexual abuse in this setting includes sexual acts with the consent of offender offender, resident, etc.).
2. Have you ever 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?
3. Have you ever been civilly or administratively adjudicated 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?

115.17 (c):

The PAQ requires Before hiring new employees who may have contact with inmates, the agency shall: (1) Perform a criminal background records check; and (2) 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.

Criminal background checks for all potential employees are completed through the Indiana Department of Corrections and a contract with Accurate Background Checks. For those considered for promotions or who transfer from another facility, an internal GEO PREA verification and a background check through Accurate are completed. If an applicant indicates on their application that they are a prior institutional employee, information from their prior institutional employers shall be requested.

115.17 (d):

The PAQ requires that the agency shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates.

The facility performs criminal background checks through Accurate Background before enlisting the services of any contractor or volunteer.

The human resources department indicates that background checks are conducted as part of the shared responsibility for the New Castle Correction Facility and Heritage Trail Correctional Facility.

115.17 (e):

The agency shall either conduct criminal background records checks at least every five years on current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees.

Agency policy requires that criminal background record checks be conducted at least every five years for current employees and contractors who may have contact with individuals who have been convicted of a crime. In an interview with the human resource director, the facility maintains a spreadsheet on all staff hiring dates and completes a background check before the staff's five-year tenure. This was verified by reviewing the personnel files of staff members with five-year tenure.

115.17 (f):

The PAQ requires the agency shall 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 and in any interviews or written self-evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.

HTCF asks all applicants and employees who have contact with offenders directly about previous sexual misconduct. Applicants are asked these questions on the GEO application. Employees and contractors complete a PREA Disclosure and Authorization Form annually as part of their Annual Performance Evaluation. For consideration for promotions or transfers, employees complete a PREA Disclosure and Authorization Form Promotions as well as a GEO internal PREA verification. The auditor reviewed ten questionnaire forms.

115.17 (g):

The PAQ requires that Material omissions regarding such misconduct, or the provision of materially false information, are grounds for termination. HTCF Policy 17.001 mandates that employees and contractors must disclose such misconduct referenced in this standard. Material omissions regarding this type of misconduct would be

	<p>grounds for termination. The submission of false information by any applicant is grounds for not hiring the applicant.</p> <p>Human Resources interviews indicate that the GEO policy mandates staff report any contact with law enforcement or civil courts on their first day back to work. She revealed she keeps a folder and shares it with the facility administrator during their morning briefings.</p> <p>115.17 (h):</p> <p>The PAQ requires, unless prohibited by law, that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.</p> <p>HTCF Policy 17.001 mandates that, unless prohibited by law, GEO will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom the individual has applied for work.</p> <p>The Human Resources interview indicated that the facility will request a signed release of information and forward it to the corporate office, which maintains the Sexual Abuse and Sexual Harassment database. The Corporate Office will forward the information to the prospective employer.</p> <p>Exceeding compliance was determined through pre-audit documentation, the PAQ, interviews with the human resources director, and a review of twenty randomly selected staff files, including those of new hires, promotions, and contractors.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required</p>
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115.18	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives, and documentation were reviewed in determining compliance with this standard:</p> <p>Facility Camera System</p> <p>Annual PREA Assessment</p> <p>Monitoring System Upgrades</p> <p>Statement of Fact</p>

	<p>There have been no additional modifications or expansions to HTCF during the last audit period. The facility has not made any upgrades to the camera system during this PREA cycle.</p> <p>In an interview with the Vice President, Risk Management (agency head designee), he stated that the agency uses technology to assist the facilities in keeping offenders safe from sexual abuse. If new facilities are designed or there are modifications to existing facilities, the agency’s PREA Coordinator works closely with the Corporate Project Development Team.</p> <p>The facility administrator stated that the facility conducts an annual assessment of staffing and camera coverage. There have been additional cameras requested in the last 3 years. We have installed cameras in several areas to enhance security and eliminate mirrors in favor of cameras.</p> <p>During the site review, some of the new cameras were identified to the auditor during the tours. There were no blind spots noted in the annual assessment or during the PREA auditor site review.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.21	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations,</p> <p>HTCF Policy 17.001</p> <p>GEO Policy 5.1.2-E PREA Investigations</p> <p>Indiana Medical Forensic Examination Providers</p> <p>Interviews:</p> <p>PREA compliance manager,</p> <p>Facility investigator</p> <p>Interview with Staff at Hendricks Regional Hospital Emergency Room</p> <p>Staff Trained as Victim Advocate.</p> <p>Indiana Coalition Against Domestic Violence Contract</p> <p>PAQ</p>

Interview with ICADV Director

115.21 (a):

The PAQ requires

The agency/facility is responsible for conducting administrative sexual abuse investigations (including inmate-on-inmate sexual abuse or staff sexual misconduct).

The facility provided Policy 5.1.2 ensures that all allegations of sexual abuse or Sexual harassment are referred for investigation to a law enforcement agency with legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The facility shall document all referrals.

b. Due to client contract requirements, the facility may be required to follow specific client PREA investigations policies. If the client policy is less restrictive than Section 28 C.F.R. Part 115 of the National PREA Standards, the PREA Standards shall prevail, and a site-specific supplemental policy shall be developed.

c. HTCF shall ensure that:

- Allegations of sexually abusive behavior receive prompt intervention upon report; and,
- Perpetrators of sexually abusive behavior are disciplined and, when appropriate, referred for prosecution by GEO policy and federal, state, or local laws.

Indiana Department of Corrections Police Officer is responsible for conducting criminal sexual abuse investigations and sexual harassment allegations that have the possibility of being criminal. HTCF-trained investigators will conduct administrative investigations.

115.21 (b):

To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

Per interview with the PCM, the agency and facility follow a protocol developmentally appropriate for youth, where applicable and adapted from or otherwise based on the U.S. Department of Justice's Office on Violence Against Women Publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents".

Heritage Trail Correctional Facility does not house youthful offenders.

115.21 (c):

The PAQ requires that the agency shall offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without

financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs.

The facility provided Indiana Medical Forensic Examination Providers and Staff at Hendricks Regional Hospital.

According to the information reported on the Pre-Audit Questionnaire, one offender was transported to have a SANE exam performed in the last 12 months.

115.21 (d)(h):

The PAQ requires that the agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency will make available a qualified staff member from a community-based organization or a qualified staff member from an agency to provide these services. Agencies shall document efforts to secure services from rape crisis centers. For this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C.14043g(b)(2)(C), to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services.

The PAQ requires that a qualified agency staff member or a qualified community-based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

The facility, through IDOC, has a contract with the Indiana Coalition Against Domestic Violence to provide emotional support services to offenders. This contract covers providing a victim advocate to accompany the victim for SANE and emotional support services after an incident of sexual abuse, including follow-up services and referrals. Offenders are made aware of the victim Advocacy support services available to them and how to access them through the Offender Handbook and PREA posters displayed throughout the facility, both in English and Spanish.

In interviews with the director of the ICADV, the agency has trained staff on call at all times to respond to whichever SANE program the victim is sent to.

115.21 (e):

The PAQ requires that, as requested by the victim, a qualified agency staff member or a qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews, providing emotional support, crisis intervention, information, and referrals.

The terms of the Contract require an advocate to accompany and support the victim throughout the forensic medical examination process and the investigative process, and to provide additional emotional support services. The SANE staff indicated they include a victim advocate to meet with the victim before the examination. There was one offender who went for a SANE evaluation.

The facility utilizes mental health staff as victim advocates, including at the hospital. The facility has provided training to the mental health staff to qualify them as victim advocates. The facility policy states that the facility shall attempt to make available to the victim a community victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the facility shall provide these services with a qualified facility staff member. The qualified staff member shall be staff trained as a SART first responder who demonstrates an understanding of the role of a victim advocate from the SART victim advocate curriculum.

As requested by the victim, the community victim advocate, a qualified SART first responder shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals. The facility offers training to staff on the Sexual Assault Response Team (SART) through the Lesson Plans Sexual Assault Response Team (SART) and Victim Advocacy that addresses the victim advocate's role during the forensic exam. Documentation of staff training was provided through Training Attendance Record forms with staff signatures. The facility submitted an incident report of an offender taken to the hospital for a SANE exam for documentation, with a SART member accompanying the offender to the hospital for victim advocacy services for the offender.

One of the trained staff members who accompanied the offender at the SANE in the last 12 months was interviewed. He indicated that he was trained in a specialized training program and felt comfortable in providing the emotional support and explaining the SANE process to the offender.

15.21 (f):

The PAQ requires that, to the extent that the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section.

The Indiana Department of Corrections Police Officers conduct all criminal investigations at the facility. The facility-trained investigative staff conducts all sexual harassment or non-criminal administrative investigations. Incidents that include allegations of sexual harassment or non-criminal sexual abuse are also referred to the GEO Office of Professional Responsibility.

The Facility Administrator and facility compliance manager indicated during the interview that they have a working relationship with the IDOC Police Officer who usually conducts all investigations at HTCF.

Based on this analysis, the facility is substantially compliant with this provision, and

	corrective action is not required.
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115.22	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations: GEO Corporate Policy 5.1.2-E Investigative Procedures.</p> <p>Investigative Files</p> <p>Interviews with</p> <p>Agency head, Facility investigator</p> <p>115.22 (a):</p> <p>PAQ requires the agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.</p> <p>HTCF Policy 5.1.2 establishes responsibility for investigations. The facility refers criminal investigations to the Indiana Department of Corrections Police. Facility staff are required to preserve the crime scene until the investigator arrives to process and collect evidence. Facility investigators and SART team members are trained in conducting sexual assault investigations in confined settings/ prisons.</p> <p>A review of documentation and interviews with investigation staff confirmed compliance with this standard. A review of training documents confirmed that all investigators received instruction in conducting sexual assault investigations in confined spaces/ prisons. Interviews with staff, as well as an examination of policy/ supporting documentation, confirm compliance with this standard. A review of training documents confirmed that the HTCF investigator received training in conducting sexual assault investigations in confined spaces/prisons.</p> <p>Interviews with staff, as well as an examination of supporting documentation, confirm the facility's compliance with this standard.</p> <p>Per the PAQ there were two allegations of sexual abuse investigated in the last 12 months. One allegation was closed as substantiated and the other investigation is still open.</p> <p>The agency head interview indicated that, based on client contract requirements, an investigation would be conducted by either the client's investigative unit, local law enforcement (if criminal), or a trained investigator from a GEO facility (administrative only).</p>

GEO has designated staff at each facility who have received PREA Specialized Investigations training. GEO also utilizes local, state, or federal agencies to investigate PREA allegations, as required by client contracts. Regardless of who does the investigation, all PREA allegations are documented and referred to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve criminal behavior.

115.22 (b):

The PAQ requires;

The agency has a policy that requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its investigations, unless the allegation does not involve potentially criminal behavior.

GEO policy 5.1.2 E and HTCF policy 5-1-2 ensure that allegations of sexual abuse or sexual harassment that appear to be criminal are referred for investigation to an agency that has the legal authority to conduct criminal investigations. HTCF facility administrator, HTCF refers all allegations of sexual abuse that are criminal to the Indiana Department of Corrections Police. The facility documents all referrals of allegations of sexual abuse or sexual harassment. All allegations are documented and tracked on the PREA Case Tracking Log. An interview with facility investigators confirmed this procedure. The agency's policy regarding the administrative investigation of allegations of sexual abuse or sexual harassment, as well as referrals for criminal investigations, is published on the agency website and can be accessed at <https://www.geogroup.com/> PREA.

115.22 (c):

The PAQ requires:

If a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity.

Information published on the GEO website describes the responsibilities of the agency and the investigating agency in the investigation of allegations of sexual abuse and sexual harassment.

Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.

115.31	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence relied upon in making the compliance determinations:

GEO Corporate Policy 5.1.2-A

Training and roll call meetings. Annual Refresher Training

GEO Pre-Service Training

PowerPoint Presentation Curriculum

Staff Attendance Record,

Random staff training records.

115.31 (a):

The PAQ requires The agency shall train all employees who may have contact with inmates on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Inmates' rights to be free from sexual abuse and sexual harassment; (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual.

Harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with inmates; (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The facility provided the following.

All staff are provided with training that includes all areas of PREA training and protocol for sexual abuse prevention, intervention, reporting, and protecting the offenders and preserving the possible crime scene. Staff undergo preservice training at the facility before having any contact with offenders.

The preservice and annual training include:

- Zero-tolerance policy for sexual abuse and sexual harassment
- How to fulfill staff responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.
- Offenders' right to be free from sexual abuse and sexual harassment.
- Offenders and employees' rights to be free from retaliation for reporting sexual abuse and sexual harassment.

- Dynamics of sexual abuse and sexual harassment in confinement.
- Common reactions of sexual abuse and sexual harassment victims.
- How to detect and respond to signs of threatened and actual sexual abuse.
- How to avoid inappropriate relationships with offenders.
- How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming offenders.
- How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
- How to conduct cross gender pat searches:

Employees carry a PREA first responder reference card. All staff receive annual refresher training in all areas of the PREA standards. Yearly refresher training is through the computer-based PREA training program Certification. A review of the training curriculum, training sign-in sheets, and other related documentation, as well as staff interviews, confirmed that staff are required to acknowledge, in writing, not only that they received PREA training, but that they understood it.

Fourteen random staff members were interviewed. All staff members attended preservice and annual in-service training, as determined by interviews and a review of their training files.

115.31 (b):

The PAQ requires that training be tailored to the gender of the inmates at the facility.

GEO and HTCF policies recognize that the facility houses male offenders. Policy mandates that the facility must modify its training to meet the needs of a different population. All staff at the facility received training that is tailored to male offenders. Staff assigned to specialized posts such as transportation officers, supervisors, and investigators receive additional training.

The PAQ requires:

All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards. The agency shall provide each employee with refresher training every two years to ensure that all employees are familiar with the agency's current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies.

The facility provided:

According to the computer database for training, all staff have received training in the last 12 months. Staff members interviewed indicated that they had received

	<p>additional refresher training within the previous six months. At HTCF, staff receive annual in-service training.</p> <p>According to the PAQ and interviews with staff between pre-service and in-service training, the facility provides additional training monthly through staff meetings, and employees receive emails regarding PREA updates and information.</p> <p>Training Posters are displayed in various locations throughout the facility.</p> <p>115.31(d):</p> <p>The PAQ requires that the agency document, through employee signature or electronic verification, that employees who may have contact with inmates understand the training they have received.</p> <p>The facility provided:</p> <p>Upon completion of PREA pre-service and annual in-service training, staff sign an Acknowledgement of Receipt of Training and Brochures Sexual Assault Prevention form and a Preservice Training Record, and an In-service Training Record form acknowledging receipt and understanding of all training received, including PREA.</p> <p>They also sign a PREA Basic Acknowledgment Training form upon completion of general PREA training and a Cross Gender Pat Searches & Searches of Transgender and Intersex acknowledgment form. Documentation of annual PREA training for employees is recorded on individual training records maintained by the training coordinator.</p> <p>A sample of sixteen initial training acknowledgments and nine annual training acknowledgments was reviewed and contained documentation supporting compliance with this standard. All staff interviewed indicated that they received the required PREA training initially and annually. Officers receive additional PREA training/updates when needed, and officers assigned to the restrictive housing unit also receive further training. The extensive training provided, combined with the staff's knowledge of PREA requirements, confirmed that the facility is compliant with this standard. A review of documentation and staff interviews further confirmed that the facility is compliant with this standard.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.32	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence relied upon in making the compliance determinations:

GEO Corporate Policy 5.1.2-A

HTCF Policy 17.001

Documentation of Contractor Training:

Acknowledgment of Receipt of Training

Volunteer Training, acknowledgment of receipt of training, and a copy of the IDOC PREA brochure

115.32 (a):

The PAQ requires:

All volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.

The facility provided

HTCF Policy 5.1.2 mandates that all volunteers and contractors who have contact with offenders have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. The facility employs 36 contractors and utilizes 40 volunteers.

115.32 (b)(c):

The PAQ requires:

The level and type of training provided to volunteers and contractors are based on the services they offer and the level of contact they have with inmates.

The agency shall maintain documentation confirming that volunteers and contractors understand the training they have received.

The facility provided:

All contractors receive the same PREA training as employees before assignment and sign a PREA Basic Acknowledgement Form and an Acknowledgement of Receipt of PREA Brochures.

The volunteer training includes volunteer receipt of training and the Indiana Department of Corrections PREA brochure. The training included the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. It informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they offer and the level of contact they have with intimates. Volunteers receive this training annually and sign a Documentation of Volunteer Training Form.

Based on this analysis, the facility is substantially compliant with this provision, and

	corrective action is not required.
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115.33	Inmate education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations: GEO Corporate Policy 5.1.2-A</p> <p>HTCF Policy 5.1.2 Offender Handbook</p> <p>Receipt of training for new arrivals, Receipt of training for transfers</p> <p>Offender PREA Brochure, Facility PREA Postings, Offender Receipt of PREA Brochure</p> <p>Offender Receipt of PREA Comprehensive Education</p> <p>Offender Orientation</p> <p>Twelve offender training files were reviewed.</p> <p>115.33 (a):</p> <p>The PAQ requires:</p> <p>During the intake process, inmates shall receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.</p> <p>The facility provided</p> <p>GEO Corporate Policy 5.1.2. A mandate that all offenders receive information at the time of intake and if transferred from another facility, about the zero- tolerance policy and how to report incidents of sexual abuse or sexual harassment, their rights to be free from retaliation for reporting such incidents and are informed of the agency/ facility policies and procedures for responding to such incidents. During an interview with intake staff on the day of arrival, offenders receive an Offender Handbook and a Sexual Assault Prevention and Reporting Offender/Student Information brochure. They also sign a Receipt for Adult Offender Handbook and Adult Disciplinary Procedures form. This was observed during the intake of an offender by the audit. Also, during the intake, offenders were watching a PREA video that included the same information.</p> <p>According to the PAQ 1116, the offender arrived at the facility during the last 12 months. 1116, or 100% of the offenders, received orientation to the facility.</p> <p>115.33 (b)(c):</p>

The PAQ requires

Within 30 days of intake, the agency shall provide comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.

The facility provided:

Offenders receive comprehensive PREA education as part of the orientation process, usually on the second day of their arrival; however, by policy, at a minimum, within the

The first seven days of arrival at the facility. Offender in Prison Rape Elimination Act (PREA) Offender Education Program acknowledgement form acknowledging receipt of PREA education. The curriculum provided to offenders was for review. When entering the Intake area, all offenders are provided with a poster that includes all required orientation requirements. The offender watches the PREA information video during the intake process. They are provided with a brochure and handbook during the intake process.

The intake staff and PREA compliance manager stated that all offenders have received the training.

The intake staff interviewed and provided the process for new arrivals. They indicated that the video is in the holding room and continuously plays during the intake process. The intake staff suggested that the offender be provided with a brochure in their preferred language and be given a handbook during this process. The intake staff indicated that they work with mental health staff if they feel the offender is not comprehending the information being provided, to determine if the data needs to be read aloud to the offender. The intake staff indicated that, usually, mental health will conduct the orientation of cognitive disabled offenders.

115.33 (d):

The PAQ requires that the agency shall provide inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, otherwise disabled, as well as to inmates who have limited reading skills.

The facility provided:

All PREA education provided to offenders is in formats accessible to all offenders, including those who are limited English proficient, deaf, visually impaired, otherwise disabled, or have limited reading skills. The offender handbook, the PREA brochure, and all verbal information given are provided in both English and Spanish. A contract for translation services is provided for ESL offenders to offer translation into any other language. A TTY machine is available for individuals with hearing impairments. The vision-impaired offender who was interviewed indicated he understood the training

and could read the large posters throughout the facility. Spanish-speaking and Korean-speaking offenders were interviewed using the Language Line. Both offenders stated that they had received orientation information via the telephone (language line).

115.33 (e):

The PAQ requires that the agency maintain documentation of inmate participation in these education sessions. The facility retains documentation of offenders' involvement in PREA education.

In a review of 12 randomly selected offender files, all had documentation of receipt of written PREA education materials. Additionally, over forty offenders were interviewed either during the tour of the facility or in formal interviews and stated that they had received orientation training and PREA handbooks, as well as comprehensive training upon arrival at the facility.

115.33 (f):

The PAQ requires In addition to providing such education, the agency shall ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats.

The facility provided posters, including Sexual Assault Prevention and Reporting Posters, GEO Zero Tolerance Posters, and End the Silence Posters. And Victim Advocacy Services. These posters were informative and included telephone numbers and addresses. Also, a Notice of Audit was posted throughout the facility.

According to interviews with the PCM and case manager, they stated that PREA education provided to offenders is in formats accessible to all offenders, including those who are limited English proficient or have limited reading skills. The facility has PREA pamphlets, posters, handbooks, and forms available in both English and Spanish. The facility has bilingual staff who are used as interpreters. A contract with Language Line Services provides translation into any other language. The limited English proficient offenders interviewed acknowledged that the information was provided in formats that could be understood.

According to information reported on the PAQ, 1110 offenders were admitted, with a length of stay in the facility of 30 days or more during the past 12 months. All 100% of the offenders received comprehensive education.

Thirty offenders were interviewed. All offenders reported receiving training upon their arrival at the facility. The interviewed offenders indicated they watched a video and were given information. Five of the offenders noted they did not read the information. All other offenders stated that they had read and understood the information provided upon arrival. Two offenders interviewed were LEP and indicated that staff at the intake were bilingual and provided information in their language.

Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.

115.34	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <p>GEO Corporate Policy 5.1.2-E</p> <p>Training Curriculum</p> <p>Specialized Training Certificates</p> <p>115.34 (a):</p> <p>The PAQ requires, in addition to the general training provided to all employees pursuant to § 115.31, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings.</p> <p>The facility provided:</p> <p>GEO Corporate Policy 5.1.2-E mandates that, in addition to the general training provided to all employees under §115.31, the agency ensure that, to the extent the agency itself conducts or assists in conducting an investigation, they will have been trained to conduct a sexual abuse investigation in a correctional setting.</p> <p>115.34 (b):</p> <p>The PAQ requires specialized training that shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>The facility provided:</p> <p>The facility Investigators have completed investigating sexual abuse in a confinement setting and have received additional online training on investigating sexual abuse.</p> <p>Training includes investigating sexual abuse through the GEO training staff. The training curriculum was reviewed and included interviewing sexual abuse victims, proper use of the Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. A copy of the training curriculum was provided for review.</p> <p>115.34 (d):</p> <p>The PAQ requires that the agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.</p>

	<p>The facility provided:</p> <p>The facility has two trained investigators. The agency maintains documentation that investigators have received specialized training on conducting sexual abuse investigations in confinement settings. Upon completion of the training, investigators receive a certificate of completion. Upon reviewing the investigators' training files, it is confirmed that they have completed both this specialized training and the general training provided to all employees, and the necessary documentation is maintained by the facility.</p> <p>During the interview with the facility investigator, he confirmed receiving specialized training and general PREA education, which is provided to all employees. He was able to confirm the topics included in the specialized training they received.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.35	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <p>Signed PREA training acknowledgements\</p> <p>Training Curriculum</p> <p>Interviews with Medical and mental health staff</p> <p>115.35 (a):</p> <p>The PAQ require the agency ensures that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: (1) How to detect and assess signs of sexual abuse and sexual harassment; (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>The facility provided acknowledgement of general and specialized training. The medical staff at HTCF received generalized training and specialized training through GEO. The training curriculum includes how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence of sexual abuse, how to respond effectively and professionally to victims of sexual abuse and sexual harassment, how and to whom to report allegations or suspicions of sexual abuse and sexual harassment as well of many other medical and mental health topics such as clinical interventions, and local policies.</p>

115.35 (b):

The PAQ requires that if medical staff employed by the agency conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations.

The facility provided:

The medical and mental health staff do not conduct forensic examinations.

115.35 (c):

The PAQ requires that the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.

The facility provided:

Staff sign an acknowledgement of training for specialized and generalized PREA training. The staff documentation is maintained on the GEO database, which was provided for review. Twelve medical staff members received the training.

In interviews with medical and mental health staff, the staff indicated that the training included (1) how to detect and assess signs of sexual abuse and sexual harassment. (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

One nurse interviewed who recently began working at HTCF had not received the specialized training. The facility implemented a corrective action plan, and she received the training the following day after the interview. The facility provided the auditor with a copy of the training.

115.35 (d):

The PAQ requires all medical staff assigned to the facility to attend the same training as required for employees by §115.31.

The facility provided:

The staff acknowledged that the medical and mental health staff have stated they received this training. In addition to this training, staff assigned to the facility through a contractor received specialized training.

Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determinations

PAQ

GEO Corporate Policy 5.1.2-A

Screening intake by medical/mental health staff

Completed the HTCF Sexual Violence Assessment Tool (SVAT)

Completed PREA Vulnerability Assessment Review (within 30 days)

Mental health referrals. Mental Health Evaluations

Interview with

Mental Health

Staff who conduct screenings

115.41 (a)(b):

The PAQ requires that all inmates shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates.

The PAQ requires that Intake screening shall ordinarily take place within 72 hours of arrival at the facility.

The facility provided

GEO policy 5.1.2-A states, "a. All Individuals in a GEO Facility or Program shall be assessed during intake and upon transfer for their risk of being sexually abused by another Individual in a GEO Facility or Program or being sexually abusive towards another Individual in a GEO Facility or Program.

This screening shall take place within 24 hours of arrival at all Facilities utilizing an objective screening instrument. HTCF Utilizes the IDOC Sexual Violence Assessment Tool (SVAT).

In addition to the screening instrument, individuals tasked with screening shall conduct a thorough review of any available records (e.g., medical files, pre-sentence investigation reports) that can assist them in risk assessment.

The facility conducts initial and reassessments using the SVAT. The screening is an objective and standardized assessment tool administered by trained case managers. The instrument and related reviews of documents provided at intake have been designed to identify the potential risk each offender presents for predatory behaviors

or their potential risk to be preyed upon by other offenders.

According to information provided on the PAQ, in the past 12 months, 1116 offenders who entered the facility were assessed for their risk of victimization or abuse upon arrival. Random sampling of offender files and offender interviews confirms that offenders were typically screened within 24 hours of arrival.

Thirty offenders were interviewed during the on-site audit. All offenders interviewed reported receiving the screening within the first two days of their stay at the facility.

Intake screening takes place within 24 hours of the offender's arrival at the facility. The process that is utilized includes part of the initial intake. Once the offender is searched, they receive PREA pamphlets and handbooks. During that time, the case manager or staff assigned to conduct the screening reviews the offender's file and meets with the offender. During this meeting, the staff introduced PREA to the offender and explained the purpose of the screening to the offender. The offender is then asked to sign to acknowledge receipt of the screening. If the offender has a history of victimization or predator behavior, or if the offender admits to being transgender, the screening staff completes a referral that is sent to the mental health staff to set up an interview with the offender. Medical and mental health staff are available during the screening process, conducting a medical review and suicide screening. Most often, the mental health staff will meet with the offender before the Referral; however, according to the screening staff, a referral is still completed as required by the database for tracking.

The facility also utilizes medical screening that includes some of the same information found in the screening instrument.

115.41 (c):

The PAQ requires a Risk assessment to be conducted using an objective screening instrument.

The facility provided:

The Sexual Violence Assessment Tool (SVAT) is an objective and standardized screening instrument conducted by trained Classification or mental health staff members. A review of the screening instrument confirms that it is a reliable and objective assessment tool.

115.41 (d)(e):

The PAQ requires The intake screening shall 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; (2) The age of the inmate; (3) The physical build of the inmate; (4) Whether the inmate has previously been incarcerated; (5) Whether the inmate's criminal history is exclusively nonviolent; (6) Whether the inmate has prior convictions for sex offenses against an adult or child; (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) Whether the inmate has previously

experienced sexual victimization; (9) The inmate's perception of vulnerability; and (10) Whether the inmate is detained solely for civil immigration purposes.

The initial screening shall consider prior acts of sexual abuse, previous convictions for violent offenses, and a history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive.

The screening includes the screener's thorough review of any available records to assist with determining the offender's risk assessment. T

he Sexual Risk

The Indicator Tool was reviewed. It contains:

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

115.41 (f):

The PAQ requires that, within a set period, not to exceed 30 days from the inmate's arrival at the facility, 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.

Based on the PAQ 1110 offenders were housed at the facility for over 30 days. All offenders that remained at the center for 30 days were interviewed utilizing the PREA Vulnerability Assessment Review tool.

The facility provided policy GEO Policy 5.1.2-A, which requires that, within a set time, not exceeding 30 days from the offender's arrival at the facility, offenders be

reassessed by their assigned Case Manager for their risk of victimization and abuse using the PREA Vulnerability Assessment Review.

Thirty offenders were interviewed. Twenty-two of these offenders had been at the facility for more than thirty days. Each of the offenders indicated they had been reassessed within the first thirty days.

115.41 (g):

The PAQ requires that an offender's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

The facility provided policy 5.1.2 A, which requires an offender's risk level to be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information. Annually, during annual classification review assessments, offenders are reassessed for risk of victimization or abusiveness using the Sexual Violence Assessment Tool (SVAT). Transgender offenders are reassessed a minimum of every six months.

115.41 (h):

The PAQ requires that the policy prohibits disciplining inmates for refusing to answer (or for not disclosing complete information related to) questions regarding: (a) whether or not the inmate has a mental, physical, or developmental disability; (b) whether or not the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) whether or not the inmate has previously experienced sexual victimization; and (d) the inmate's perception of vulnerability.

The facility provided Policy 5.1.2 A, which mandates that offenders are not disciplined for refusing to answer any questions or for not disclosing complete information.

Interviews with screening staff confirmed that they would not discipline or coerce a offender into answering screening questions.

115.41 (i):

The PAQ requires the agency to implement appropriate controls on the dissemination of responses to questions asked under this standard within the facility, ensuring that sensitive information is not exploited to the inmate's detriment by staff or other inmates.

HTCF implemented appropriate controls on the dissemination of responses to questions asked related to sexual victimization or abuse to ensure sensitive information is not exploited by employees or other individuals. Sensitive information is limited to employees who require access to it for treatment, programming, housing, security, and management purposes.

The PREA compliance manager indicated that only persons who need to know to

	<p>make housing, work, or program assignments have access to the screening instruments.</p> <p>Staff who conduct screening indicate they would provide a copy to Mental Health as part of the referral process, intake staff, and PCM.</p> <p>The facility's PREA compliance manager indicated that only Classification staff, case managers, mental health staff, medical staff, and PCM have access to the offender's screening information.</p> <p>During the on-site assessment, the offender files were reviewed. They were locked in a sliding cabinet in the records office and can only be accessed by entering the office and unlocking the cabinet.</p> <p>All offenders are screened upon transfer into the facility, including those who leave the facility for court appearances or other administrative purposes.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.42	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations: Risk assessment log GEO Policy 5.1.2-A Transgender Care Committee Interview with PCM Staff who conduct screening Classification Supervisor</p> <p>115.42 (a):</p> <p>The PAQ requires that the agency shall use information from the risk screening required by § 115.41 to inform housing, bed, work, education, and program assignments to keep separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>The facility provided:</p>

GEO policy 5.1.2-A and interview with the classification supervisor. The agency uses the information from the risk screening form to make housing, bed, work, education, and program assignments to separate offenders at high risk of being sexually victimized from offenders at high risk of being sexually abusive. The facility maintains a Bed Location chart that identifies at-risk offenders and potential predator offenders. The classification supervisor explained that before assigning an offender to a bed, the intake staff reviews the open beds to determine the rooms that house at-risk and possible predator offenders. This same information is utilized in programming and work assignments for offenders.

115.42 (b):

The PAQ requires the agency to make individualized determinations about how to ensure the safety of each offender.

Individualized determinations are made about how to ensure the safety of each offender. Offenders who score at risk of victimization or abusiveness are referred for further evaluation with the Mental Health provider. Offenders have the option of refusing these services. The facility does not have any specialized housing based on sexual orientation. It does have a housing plan for housing offenders based on risk assessment.

115.42 (c):

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

The facility provided:

GEO policy mandates that when making housing and programming assignments for transgender or intersex offenders, the facility will consider on a case-by-case basis whether the placement would present management or security problems. Offenders who self-disclose being gay, bisexual, transgender, or intersex are tracked on an LGBTI List that the PREA Compliance Manager maintains. Transgender and intersex offenders are housed after meeting with the Transgender Care Committee (TCC). The PREA Compliance Manager, Chief of Security, Classification Supervisor, and Health Services Director make up TCC. The TCC would meet with the offender, complete a GEO Statement of Search/Shower/Pronoun Preference Form, and document the meeting on the Transgender Care Committee Summary. At the time of the on-site audit visit, there were no transgender or intersex housed at the facility.

115.42 (d) - (f)

The PAQ requires

Placement and programming assignments for each transgender or intersex inmate shall be reassessed at least twice each year to review any threats to safety

	<p>experienced by the inmate.</p> <p>A transgender or intersex inmate's views concerning his or her safety shall be given serious consideration.</p> <p>Transgender and intersex inmates shall be allowed to shower separately from other inmates.</p> <p>The facility provided:</p> <p>HTCF Policy 5.1.2 A requires that A transgender or intersex offender's housing and program assignments will be reassessed every six months to review any threats to safety experienced by the offender. Transgender and intersex offender placement and programming are evaluated as needed, but at least every six months. A transgender or intersex offender's views of their safety are taken into consideration. When the TCC meets with transgender or intersex offenders, they are allowed to express their views. In conversation with the TCC committee, each member indicated that the agency and facility would house offenders based on their opinions, unless it would jeopardize the safety and security of the facility.</p> <p>Transgender and intersex offenders are offered the opportunity to shower separately from other offenders, as indicated in their Statement of Search/Shower/Pronoun Preference Form.</p> <p>GEO does not place lesbian, gay, bisexual, transgender, or intersex offenders in dedicated units or wings solely based on such identification. In an interview with two offenders who self-disclosed being gay, they did not feel he was housed any differently because of their sexual orientation.</p> <p>PREA compliance manager interview: We have a Transgender care committee that meets with offenders who indicate they are transgender or intersex upon arrival at the facility. The team and offender review housing options and discuss their views on these options. The TCC meets with the offender at least every six months. At the time of the onsite audit, the center did not house any transgender or intersex offenders.</p> <p>Staff who conduct screening. Yes, offenders are allowed to shower by themselves. The TCC and the offender meet to discuss housing arrangements. That is up to the committee and offenders.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.43	Protective Custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence relied upon in making the compliance determinations: GEO Corporate Policy 5.1.2-A

Sexual Abuse/Assault Available Alternatives Assessment

Statement of Fact PAQ

115.43 (a):

The PAQ requires that the agency have a policy prohibiting the placement of 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.

The facility provided:

GEO Corporate Policy 5.1.2-A indicated that involuntary placement in the restrictive housing unit may be used:

- a. Only after an assessment of all available housing alternatives has shown that there are no other means of protecting the prisoner.
- b. If the facility cannot conduct such an assessment immediately, the prisoner may be placed in involuntary segregated housing for no more than 24 hours while completing the assessment.
- c. HTCF shall utilize the "Sexual Abuse Available Housing Alternatives Assessment" form to document the assessment. All completed forms shall be reviewed and signed by the facility administrator or assistant facility administrator upon completion.
- d. If segregated housing is used, the prisoner shall have all possible access to programs and services for which he/she is otherwise eligible, and the facility shall document and justify any restrictions imposed. Justification must include the services restricted, the reason for the restriction, and the duration of the limitation.
- e. Involuntary segregated housing shall not ordinarily exceed 30 days.
- f. In cases where involuntary segregated housing is needed for longer than the initial 30 days, the facility shall review the status every 30 days to determine if ongoing involuntary segregated housing is necessary.

The procedure prohibits the placement of offenders at high risk for victimization in segregated housing unless an assessment of all available alternatives has been made and there is no available means of separation from the likely abuser.

The facility administrator provided a statement of fact that the facility does not have any segregation or restrictive housing beds on the campus. The center would have to request permission to house offenders at the New Castle Correctional Facility.

115. 43.(b):

The PAQ requires that inmates placed in segregated housing for this purpose shall have access to programs, privileges, education, and work opportunities to the extent possible. If the facility restricts access to programs, privileges, education, or work opportunities, the facility shall document: (1) the opportunities that have been limited; (2) the duration of the limitation; and (3) the reasons for such limitations.

The facility provided:

GEO Corporate Policy 5.1.2-A If segregated housing is used, the offender shall have all possible access to programs and services for which he/she is otherwise eligible, and the facility shall document and justify any restrictions imposed. Justification must include the restricted services, the reason for the limitation, and the duration of the restriction. The facility has no way of housing offenders in a restrictive housing unit.

115.43 (c):

The PAQ requires that the facility assign such inmates to an involuntary restrictive housing unit only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed 30 days.

The facility provided:

Based on interviews with the facility administrator, PCM, and classification supervisor, if this placement was necessary, staff stated that the offender would have access to the appropriate privileges, and the justification for the placement would be documented. The offender would be reviewed by the Institution Classification Team every 30 days.

115.43(d):

The PAQ requires that if an involuntary restrictive housing unit assignment is made under paragraph (a) of this section, the facility shall document: (1) the basis for the facility's concern for the inmate's safety; and (2) the reason why no alternative means of separation can be arranged.

The facility provided:

The facility would document the basis for its concern regarding the offender's safety and the reason that no alternative means of separation can be arranged. The facility administrator would then contact IDOC and arrange transport of the offender to the IDOC facility located in close proximity to the facility. The facility does not have a Restrictive Housing Unit or a way of separating offenders.

115.43 (e):

The PAQ requires that, in cases where involuntary restrictive housing is used for longer than the initial 30 days, the facility will review the status every 30 days to determine if ongoing involuntary housing is needed.

The facility provided: The PAQ, the facility administrator, and the Classification supervisor.

	<p>According to information provided on the Pre-Audit Questionnaire and in an interview with the Facility Administrator in the past 12 months, there has not been a time when an offender found at high risk of victimization or an offender who alleged sexual abuse was placed in any specialized housing, nor does the facility have a specialized housing unit.</p> <p>The classification supervisor indicated that the facility has 10 standalone housing units located in a campus-style setting, and the facility has stratified the population to manage the at-risk offender. If the facility can not manage the offender, she would notify the facility administrator and ask that he request the offender be moved to another facility.</p> <p>Compliance with this standard was determined through a review of procedures, observation during a tour, and interviews.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.51	Inmate reporting
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The following policies, directives, and documentation were reviewed in formulating compliance with this standard:</p> <p>PAQ</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>Program brochure</p> <p>PREA posters</p> <p>PREA hotline reporting posters</p> <p>Offender Handbook</p> <p>Utilizing the Offender phone system to call the reporting Posters GEO website</p> <p>115.51 (a):</p> <p>The PAQ requires the agency has established procedures allowing for multiple internal ways for inmates to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other inmates or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.</p>

The facility provided

GEO policy 5.1.2-A mandate that facilities provide multiple internal ways for offenders to report sexual abuse and sexual harassment privately, offer numerous internal ways for offenders to privately report retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, provide multiple internal ways for offenders to privately report staff neglect or violation of responsibilities that may have contributed to such incidents. Policies also mandate that a private entity or office be able to receive and immediately forward offender reports of sexual abuse and sexual harassment to agency officials and that the private entity or office allow the offender to remain anonymous upon request.

Offenders are informed in the Offender Handbook, on posters located throughout the facility, and by nearly all telephones used by offenders.

HTCF provides multiple internal ways for offenders to privately report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Offenders are provided with the Sexual Assault Awareness Program brochure and the offender handbook. Various PREA posters

And notifications posted by all phones provide reporting options. Interviews with offenders confirmed that they were aware of multiple internal channels for reporting.

The handbook provides the following information to offenders. The same information is found on posters throughout the facility:

Report all instances of Sexual Assault/Harassment against you. A PREA allegation can be reported in writing (e.g., sick call, counselor Request form, grievances) or in person by reporting it to any staff member. If you do not feel comfortable reporting an allegation to security staff, you can request to speak with the chaplain, medical or mental health staff, or claim a medical emergency. Reports can be made to third parties and anonymously.

The auditor tested the telephone system from several telephones, including the rolling phone located in the restrictive housing unit. The telephone system requires offenders to provide their Indiana Department of Corrections Offender ID and the HTCF PIN to utilize the telephone to make a report of sexual abuse or sexual harassment. Posters are provided throughout the facility and located near the tablet whenever the offender signs on. They give the address for the Indiana Ombudsman Office, which the offender can contact by mail without providing a stamp or their offender number to report privately to the Ombudsperson's office. The ombudsman will notify the IDOC PREA coordinator, who will inform the facility and the IDOC Police.

115.51 (b):

The PAQ requires the agency also to provide at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the

agency, and that can receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Inmates detained solely for civil immigration purposes shall be provided with information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security.

The facility also provides the Indiana Ombudsman address to write to make a report of sexual abuse or sexual harassment. This report will be anonymous upon request.

The facility provided the following response: Posters that describe how offenders can report allegations of sexual abuse or sexual harassment.

These include a GEO and facility Brochure that offenders receive during intake, which provides telephone numbers and multiple ways to report.

A poster with information on how to report is located throughout the facility.

These include Brochures that offenders receive during intake, which provide information on reporting to staff, medical or mental health staff, PCM, filing a grievance, or calling the hotline.

A tour of the facility found the

- a. Signage language is clear and easy to understand.
- b. Signage specific to services, such as emotional support services, civil immigration, and external reporting, should include language that details what services are available and for what purposes.
- c. Signage is provided in English and Spanish.
- d. The signage text size, formatting, and physical placement accommodate most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair, etc.
- e. The information provided by the signage is not obscured, unreadable due to graffiti, or missing due to damage

115.51(c):

The PAQ requires that the agency have a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties.

GEO policy 5.1.2-A requires employees to accept reports made verbally, in writing, anonymously, and from third parties, and verbal reports shall be promptly documented.

Staff interviewed were aware of the requirement to accept reports made verbally, anonymously, and from third parties. All staff interviewed indicated they would document verbal reports immediately and notify the shift supervisor by phone or in

	<p>person.</p> <p>115.51 (d):</p> <p>The PAQ requires that the agency establish procedures for staff to report sexual abuse and sexual harassment of inmates privately.</p> <p>A GEO corporate phone number is provided to staff to report privately any sexual abuse or sexual harassment by offenders. The GEO website offers the following PREA information: GEO Employees may report sexual abuse or sexual harassment information to the Chief of Security or facility management privately if requested.</p> <p>They may also report sexual abuse or sexual harassment directly to the employee hotline, an independent professional service available 24 hours a day, seven days a week, on the Internet at www.reportlineweb.com/geogroup or by calling the toll-free phone number (866) 568-5425. Employees may also contact the Corporate PREA Coordinator directly at (561) 999-5827. Staff were aware of how they could report and felt, if necessary, they would feel comfortable reporting privately to the HTCF PREA compliance manager. Staff members carry a Sexual Abuse First Responder Card, which includes an employee hotline number and the website address for reporting abuse anonymously.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.52	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <p>Indiana Department of Corrections</p> <p>(IDOC)policy 00.02.301</p> <p>Offender Grievance Process</p> <p>HTCF policy 17.001</p> <p>HTCF Offender Handbook</p> <p>HTCF Grievance Log</p> <p>Interview with</p> <p>Grievance Officer</p>

PCM

Test of the grievance system

115.52 (a) (b)(c):

The PAQ requires that an agency shall be exempt from this standard if it does not have administrative procedures to address inmate grievances regarding sexual abuse.

The PAQ requires an agency policy or procedure that allows an inmate to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred.

The PAQ requires that the agency's policy and procedure allow an inmate to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint.

The facility is provided.

IDOC policy 00.02.301, Offender Grievance Process, and policy 17.0001 provide a procedure for offenders to submit grievances regarding sexual abuse, and the agency has established guidelines for addressing these grievances. Posters located throughout the facility advise residents that they may file a grievance. The offender handbook explains the process of filing a grievance. Facility policy 17.0001 mandates, "There shall be no time limit on when an offender may submit a grievance regarding an allegation of sexual abuse. Offenders shall have a right to submit grievances alleging sexual abuse to someone other than the staff member who is the subject of the complaint. Such grievances shall also not be referred to a staff member who is the subject of the complaint. Offenders shall not be required to use any informal grievance process or attempt to resolve with employees an alleged incident of sexual abuse.

According to the interview with the PREA Compliance Manager and the information provided on the Preaudit Questionnaire, no PREA-related grievances were filed in the past 12 months. Policy also provides that the agency policy requires an offender not to use an informal grievance process, or otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

115.52 (d):

The PAQ requires (1) that 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. (2) Computation of the 90 days does not include time consumed by inmates in preparing any administrative appeal. (3) The agency may claim an extension of time to respond of up to 70 days, if the normal period for response is insufficient to make an appropriate decision. The agency shall notify the inmate in writing of any such extension and provide a date by which a decision will be made.

(4) At any level of the administrative process, including the final level, if the inmate

does not receive a response within the time allotted for reply, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level.

The facility provided

Policy 17.001 indicates that a final decision shall be issued on the merits of any portion of the grievance alleging sexual abuse within ninety (90) days of the initial filing of the grievance. The facility may claim an extension of time to respond (for good cause) for up to 70 days and will notify the individual in writing. At any level of the administrative process, including the final level, if the offender does not receive a response within the time allotted for reply, including any properly noticed extension, the offender may consider the absence of a response to be a denial at that level.” The offenders are informed of the sexual abuse grievance process through an addendum to the Offender Handbook.

115.52 (e):

The PAQ requires that Agency policy and procedure permit third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of inmates.

The facility provided:

HTCF Policy 17.001 indicates that third parties such as fellow offenders, family members, attorneys, or outside advocates may assist offenders in filing requests for administrative remedies relating to allegations of sexual abuse and may file on behalf of offenders. The alleged victim must agree to have the request filed on their behalf; however, they are not required to pursue any subsequent steps in the administrative remedy process personally. If the offender declines to have the request processed on their behalf, the agency shall document the offender’s decision. According to the PREA Compliance Manager and information provided in the Pre-Audit Questionnaire, no grievances were filed by a third party in the past 12 months.

115.52 (f):

The PAQ requires that the agency have a policy and established procedures for filing an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse.

115.52 (f): GEO and HTCF policy provides that offenders may file an emergency grievance if they are subject to substantial risk of imminent sexual abuse. After receiving an emergency grievance of this nature, the facility administrator or designee will ensure that immediate corrective action is taken to protect the alleged victim. An initial response to the emergency grievance is required within 48 hours, and a final decision will be made within five calendar days.

In an interview with the PREA Compliance Manager and on information provided on the Pre-Audit Questionnaire, in the past 12 months, there have been no emergency

	<p>grievances alleging sexual abuse filed.</p> <p>115.52 (g):</p> <p>The PAQ requires that the agency have a written policy that limits its ability to discipline an inmate for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the inmate filed the grievance in bad faith.</p> <p>The facility provided</p> <p>HTCF Policy 17.0001 provides that an offender can be disciplined for filing a grievance related to alleged sexual abuse if it is determined that the offender filed the grievance in bad faith.</p> <p>The Grievance officer was interviewed. She indicated that the officer retrieves grievances daily. If any grievance pertains to a PREA allegation, the grievance officer</p> <p>Takes it to the facility administrator and the PREA compliance manager immediately.</p> <p>Site Review:</p> <p>There were grievance boxes located in each housing unit. There were also grievance forms located in the same area. The facility allows offenders to have paper and pencils, as noted by conversations with offenders during the initial tour.</p> <p>The auditor placed a mock grievance in a grievance box during the on-site tour. The PCM responded and provided their response on the second day of the on-site audit.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.53	Inmate access to outside confidential support services
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>Acknowledgement of Receipt of Orientation Offender</p> <p>Acknowledgement of Receipt of Handbook</p> <p>Victim Advocate Posters</p> <p>Contract between IDOC and Indiana Coalition against Domestic Violence</p> <p>Interview with the Director of Indiana Coalition against Domestic Violence</p>

115.53 (a)(c)

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

The PAQ requires the agency or facility to maintain a memorandum of understanding (MOU) or other agreements with community service providers that can provide inmates with emotional support services related to sexual abuse.

The facility provided

HTCF Policy 17.001 and Contract between IDOC and Indiana Coalition against Domestic Violence

The agency/facility's policies on providing offenders with access to outside victim advocates for emotional support services related to sexual abuse. The facility enables reasonable communication between the offenders and these agencies in a confidential manner.

The facility's policy 17.001 Sexual Abuse Prevention states, "The facility shall ensure that adequate emotional support services related to sexual abuse are available to victims of sexual abuse immediately following a reported incident and during their transition from incarceration to the community. Additionally, offender victims of sexual abuse shall be provided access to outside victim advocates and/or mental health professionals for support services related to sexual abuse, whether or not they report the abuse. The IDOC and/or the facility shall make arrangements for these services through agreements with the victim's advocate. The contact information for community victim advocates shall be posted throughout the facility and provided in PREA education materials. Offenders shall be informed of the extent to which any calls and correspondence shall be subject to monitoring for mandatory reporting purposes where applicable.

The facility provides emotional support service information to the offender through the Sexual Abuse Prevention and Reporting Offender/Student Information Brochure and a posting of Additional Services for Victims of Sexual Abuse. The brochure informs the offenders that "persons who have been sexually abused assaulted, either while incarcerated or before, will have counseling and treatment made available to them. This counseling and treatment will be provided by facility mental health staff or qualified persons trained to provide counseling to victims of sexual assault. Counseling is confidential, and arrangements can be made, at your request and before your release, to continue counseling outside of the facility. Victims may request counseling by submitting a health care request form or writing to an outside victim advocacy organization at the address the facility provided to you." The posting outlines "In addition to counseling provided by a mental health professional at your

facility, victims of sexual abuse, either during or before incarceration, can receive emotional support services from a victim advocate at the Indiana Coalition Against Domestic Violence (ICADV).

ICADV will provide the victim a person they can talk to about what happened to them confidentially for crisis intervention, give the offender a plan to address the trauma caused by the sexual abuse, and provide referrals to services that provide ongoing support during and after release” The posting directs the offender to call the hotline from the offender phone system or write to ICADV. The address and hotline number are provided to the offender on the posting. The posting also informs the offender that phone calls will not be routinely monitored; however, they can be reviewed for possible disciplinary action if there is a suspected misuse of the service.

The facility, through IDOC, has a contract with the Indiana Coalition Against Domestic Violence to provide emotional support services to offenders. This contract covers emotional support services after an incident of sexual abuse, including follow-up services and referrals. The contract agreement requires the organization to meet the victim advocate qualifications.

The PREA Compliance Manager stated the facility has trained staff as victim advocates to accompany the offender through the forensic exam and provide emotional support.

A victim advocate will be provided to the inmate upon request to provide emotional support during the forensic medical examination and investigation interviews through facility staff. The facility offers a trained staff member for victim advocacy services for an offender victim during the forensic exam and investigatory interviews. The PREA Compliance Manager stated that mental health staff are utilized as victim advocates. The facility has four specialized, trained victim advocates.

The facility provides offenders with a brochure that includes information on how to access emotional support staff through the offender phone system. This information was located next to the offender's telephones.

The facility also provides offenders with a handbook that includes the same information that is in the brochures.

The auditor called the hotline number and spoke with a staff member at ICADV, who provided emotional support. They were very familiar with the facility and the Contract with IDOC on behalf of the facility.

In an interview with the ICADV director, she indicated that the program provides emotional support, victim advocacy, and training of IDOC, including the two GEO facilities. ICADV provides training for many of the victim advocacy programs in Indiana and works with IDOC to train staff. During the last year, the program offered a four-hour training for IDOC PREA Compliance Managers that was attended by the majority of these staff members. She indicated that at least one of the staff was a GEO PREA Compliance Manager.

	<p>Heritage Trail Correctional Facility does not house offenders solely for civil immigration purposes.</p> <p>115.53 (b):</p> <p>The PAQ requires that the facility inform inmates, before granting 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 by mandatory reporting laws.</p> <p>The Residents PREA Handbook provides a phone number and address of the ICADV, and posters located throughout the facility provide the same information. The handbook and poster indicate that telephone calls to the center are confidential, and no one will listen to them.</p> <p>Thirty offenders were interviewed. Twenty-six of the offenders were aware of the Victim Emotional Support program. All of the 26 knew the phone call was free and the information was available on the walls, in the handbook, and in a brochure. Only five knew the program was a victim advocacy program. All indicated they could call anytime. Twenty-two indicated that no one would listen to their private calls. Two stated that they knew the calls were private; however, they were not sure if someone would listen to their calls. Four of the offenders indicated they were not aware of the emotional support program.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.54	Third-party reporting
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations: GEO Corporation Policy 5.1.2-A</p> <p>PREA brochure</p> <p>GEO website</p> <p>115.54 (a):</p> <p>The PAQ requires the agency shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate.</p> <p>The facility provided.</p> <p>Reporting Posters are visible in the visitation room and lobby, and are also included in the offender handbook. GEO provides a Reporting system on the GEO website</p>

	<p>(http://www.geogroup.com/PREA, Social Responsibility-PREA Certification Section), which offers information on ways for third-party reporting, including anonymous reporting. Third-party grievance forms are available on the website and are sent to the facility's Warden. Offenders can accomplish third-party reporting by having a friend or family member contact the Indiana Ombudsman, facility administrator, or Corporate PREA coordinator.</p> <p>Family, friends, or other outside entities can report third-party incidents by calling the Indiana Ombudsman, the PREA hotline, or emailing the GEO coordinators' office at PREAinfo@geogroup.com. Interviews with offenders revealed that they were aware of how third-party reporting could be accomplished.</p> <p>Family and friends can contact the facility administrator, PREA compliance managers, or file a grievance on behalf of the offender. This information is posted in areas visible to staff. Visitor Poster includes anyone needed to report abuse/ sexual harassment or to report an allegation of Sexual Abuse/ Sexual Harassment on behalf of an individual who is or was housed in any GEO facility or program, may contact the Facility Administrator's Office in the facility where the alleged incident occurred or where the individual is housed. The visitation room had the offender reporting poster displayed for visitors.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.61	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>Staff training</p> <p>Specialized medical training.</p> <p>Mandatory reporting Survey of Vulnerable Persons</p> <p>GEO PREA Lesson Plan</p> <p>PAQ</p> <p>Staff Interviews</p> <p>Random staff</p> <p>Medical staff,</p>

Mental health staff

Facility administrator,

PREA coordinator,

115.61 (a):

PAQ requires the agency to require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency.

The facility provided GEO Corporate Policy 5.1.2-A and staff, volunteer and contractor training

Staff, volunteers and contractors must take all allegations of sexual abuse and sexual harassment seriously and are required to report immediately any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment and any retaliation against offender or staff who reported such an incident, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. This information is to be reported to the Shift Supervisor, the PREA Compliance Manager, or the facility executive staff.

In interviews with randomly selected staff and contractors, they were aware of their reporting duties. Staff receive training in reporting. GEO has implemented a specialized training program for medical and mental health professionals that includes duties to report the State's vulnerable persons.

The facility provided a statement of fact that there have been no allegations of abuse or neglect involving vulnerable people in the last 12 months.

Random staff interviews revealed that they would accept any allegation of abuse or harassment, document the allegation as soon as possible, and notify the shift supervisor and PREA compliance manager. Random staff interviewed indicated they are mandatory reporters and must report allegations or suspicions of sexual abuse or sexual harassment, regardless of when or where it may have happened.

The staff interview also noted that if the allegation was sexual abuse, they would implement the response plan.

- Would separate the victim and abuser
- Would notify their supervisor
- Would secure the crime scene
- Would ask the victim and abuser not to wash, use the toilet, or change clothes
- Would notify medical as needed.

115.61 (b):

PAQ requires, apart from reporting to designated supervisors or officials and designated state or local services agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

The facility provided

Policy and training mandates that, apart from reporting to designated supervisors, staff are not to reveal any information related to a sexual abuse report to anyone. Staff and contractors interviewed were aware that this information was to be kept confidential and knew whom to report allegations.

Staff interviewed were aware that they should only share the information with people who needed to know, based on the direction of their supervisor.

115.61 (c)(d):

PAQ requires that, unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.

The facility provided

If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Medical specialized medical training requires medical staff to report sexual abuse and to inform offenders of their duty to report and the limitations of confidentiality at the initiation of services. The training also provides instruction on reporting a vulnerable adult under a State or local vulnerable person's statute, as well as applicable mandatory reporting laws.

The facility does not house offenders under the age of 18. Medical and mental health staff interviewed confirmed this practice. The medical and mental health staff indicated that the offender sign a statement that includes a limitation of confidentiality.

The PREA Coordinator interview indicated that, unless precluded by state, federal, or local law, medical and mental health staff are required to report allegations of sexual abuse or sexual harassment made by someone under the age of 18 or someone considered a vulnerable adult under state or local law.

115.61 (e):

PAQ requires the facility to report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated

	<p>investigators.</p> <p>The facility provided</p> <p>In an interview with the facility administrator and his executive team, the HTCF reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports to the Indiana Department of Corrections, and facility investigators. There are staff reporting posters located throughout the facility. Staff carry a PREA card with this information for easy reference in making reports.</p> <p>According to statements, there have been no reports from third parties, contractors, or volunteers in the last 12 months. Interviews with the Agency PREA coordinator and agency head confirmed that GEO mandates staff, volunteers, and contractors report all allegations or suspicions of sexual abuse or sexual harassment to the shift supervisor and the PREA compliance manager, who is also the facility investigator.</p> <p>The facility administrator's interview indicated he expects that staff report all allegations of sexual abuse or sexual harassment immediately to their shift supervisor.</p> <p>Site Review: During the facility tour, staff were asked how they would report abuse or harassment. All indicated they would report to their immediate supervisor. Some indicated they would also report to the PCM. They are posting posters throughout the facility, including the staff roster room and break room. Staff were also aware of the GEO hotline, which allows them to make anonymous reports.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.62	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>Statement of Fact:</p> <p>Interviews with</p> <p>Agency Head</p> <p>Facility Administrator Random Staff</p> <p>The PAQ indicates that when the agency or facility learns that an offender is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect</p>

	<p>the offender (i.e., it takes some action to assess and implement appropriate protective measures without unreasonable delay).</p> <p>The facility provided:</p> <p>115.62 (a): GEO Corporate Policy 5.1.2-A mandates that when the facility learns that an offender is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the alleged victim. All allegations of sexual abuse are to be handled confidentially, and conversations with the victim are sensitive, supportive, and nonjudgmental.</p> <p>The PAQ indicated that in the past 12 months, there were no times it was necessary for the facility to take immediate action regarding an offender being in substantial risk of sexual abuse. The facility administrator stated that if it were suspected that an offender was at significant risk of sexual abuse, he would immediately separate the abuser or victim and investigate. Staff interviewed were aware of their responsibilities if they felt an offender was at risk of sexual abuse.</p> <p>Random staff and shift supervisors indicated that the offender who was in imminent danger would be separated from the accuser. The staff presented several options, including moving the victim to the medical office, intake, or the supervisor’s office.</p> <p>All random staff indicated they would take immediate action to protect the victim.</p> <p>The facility administrator indicated that staff would take immediate action to protect the inmate from further harm and make necessary referrals to medical and mental health as appropriate.</p> <p>The facility agency head indicated that GEO takes immediate action to protect the victim from further harm and refers them for necessary services (medical, mental health, etc.).</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.63	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <p>GEO Policy 5.1.2.A</p> <p>PAQ</p> <p>Interviews</p>

Agency head

Facility administrator

115.63 (a)-(c):

PAQ requires the agency has a policy requiring that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred.

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

The agency shall document that it has provided such notification.

The facility provided policy 5.1.2-A Reporting to Other Confinement Facilities.

Policy mandates if a prisoner alleges that sexual abuse or sexual harassment occurred while confined at another facility, the facility shall document those allegations, and the facility administrator or in his/her absence, the assistant facility administrator where the allegation was made, shall contact the facility administrator or designee where the abuse is alleged to have occurred as soon as possible, but no later than 72 hours after receiving the notification.

The facility will ensure that it maintains documentation to confirm that it has provided such notification and all actions taken in response to the incident. Copies of this documentation shall be forwarded to the PREA compliance manager and the corporate PREA manager with oversight of the facility.

115.63 (d)

The PAQ requires that the agency or facility's policy require allegations received from other facilities and agencies to be investigated by PREA standards.

The facility provided Policy 5.1.2-A, which requires that when it receives notification of alleged abuse or harassment, it must ensure that the allegation is investigated by PREA standards.

In an interview with the agency head, all reports received will be reported to the sending facility administrator by the housing facility administrator within 72 hours. The agency head indicated that the administrator cannot designate staff to conduct this notification.

The facility administrator interviewed indicated he was aware of that responsibility.

He indicated that they would notify the sending facility and the local IDOC Police and facility investigator to assist the sending facility in the investigation of the allegation.

	<p>According to the PAQ and statement of fact, there have been no allegations by a receiving offender that they had been sexually abused or harassed. According to the PREA compliance manager's interview, there have been no reports from another facility of an offender making an allegation that occurred at HTCF.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.64	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <p>PAQ</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>PREA lesson plan</p> <p>PREA Responder pocket card</p> <p>Coordinated Response Plan</p> <p>Investigative Reports Log</p> <p>Interview</p> <p>Random Staff</p> <p>First Responders</p> <p>115.64 (a):</p> <p>The PAQ requires Upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and (4) If the abuse occurred within a period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p>

The PAQ indicated that one allegation was made to a correctional staff member.

The facility provided Policy 5.1.2-A, which states that upon receipt of a report that an offender was sexually abused or sexually harassed, or if the employee sees abuse, the first security staff member to respond to the report shall:

- a. Separate the alleged victim and abuser.
- b. Immediately notify the on-duty or on-call supervisor and remain on the scene until relieved by responding personnel.
- c. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
- d. 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.
- e. Do not let the abuser take any actions that could destroy physical evidence,

Including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

- f. 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.
- g. It is essential that all contact with the alleged victim be sensitive, supportive, and non-judgmental.
- h. Apart from reporting to designated supervisors, employees shall not reveal any information related to the incident to anyone other than to staff involved with investigating the alleged incident.

115.64 (b):

The PAQ requires If the first staff responder is not a security staff member, the responder shall be necessary to request that the alleged victim not take any actions that could destroy physical evidence and then notify security staff.

Based on the PAQ, there has been no first responder who was not a correctional staff member who was told by an offender that he had been inappropriately sexually touched.

Policy 5.1.2-A requires that non-correctional staff who are first responders must request that the alleged victim refrain from taking any actions that could destroy physical evidence and then notify security staff.

All staff interviewed, including non-custody staff, were well aware of their responsibilities as first responders.

All non-contact staff who were interviewed were aware of their duties and reported

	<p>that they received training during yearly in-service sessions, and reminder training is sent out by the PREA compliance managers from time to time.</p> <p>All staff interviewed, including non-custody staff, were well aware of their responsibilities as first responders. 100% of staff reported that they would immediately separate the offenders, keep the victims safe, and do everything possible to preserve the crime scene. They would also advise the involved offenders not to wash, shower, change clothing, brush their teeth, eat, drink, or use the toilet. They all said they would also immediately call a supervisor and remain on the scene until relieved by responding personnel. All staff are trained as first responders and were issued a pocket card that lists the steps to take when responding to an allegation that an offender was sexually abused.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.65	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <p>GEO Corporate Policy 5.1.2-A.</p> <p>HTCF Policy and Procedure 17.001 – Appendix PREA Coordinated Response Plan</p> <p>PREA Incident Checklist for Incidents of Sexual Abuse and Harassment PREA Cards</p> <p>Interview</p> <p>Facility Administrator</p> <p>115.65 (a):</p> <p>The PAQ requires that the facility develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff, first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>The facility provided:</p> <p>GEO Corporate Policy 5.1.2-A and HTCF Policy 17.001 mandate that facilities have a coordinated response plan. The HTCF Coordinated Response Plan provides written guidance to staff and administration regarding actions to take and notifications to be made. A PREA Incident Checklist for Incidents of sexual abuse and Harassment is completed to ensure that all steps of the plan are followed and proper notifications are made. The Coordinated Response Plan includes:</p>

	<p>HTCF is a comprehensive plan that includes</p> <p>Section I, Actions required after report of sexual abuse,</p> <p>Section II: Initial response,</p> <p>Section III outlines the Notification required when Sexual Abuse is alleged.</p> <p>Section IV involves the evidence protocol, including medical responsibilities and mental health responsibilities.</p> <p>Section V outlines investigative Responsibilities</p> <p>Section VI involves responsibilities when sexual harassment is alleged</p> <p>Section VII is the responsibility when sexual activity is alleged.</p> <p>Each of the above responses includes, but is not limited to, staff, contractors, victim advocates, IDOC, and the GEO PREA coordinator.</p> <p>A PREA Incident Checklist for Incidents of Sexual Abuse and Harassment is completed to ensure that all steps of the plan are carried out and proper notifications are made. The Chief of Security, Lieutenants, the PREA Compliance Manager, the Lead Investigator, and members of the administrative staff are responsible for ensuring compliance with the plan.</p> <p>The Facility administrator indicated that the facility has a coordinated response plan, which is updated annually and is part of the staff's annual training.</p> <p>Staff interviewed confirmed that they are knowledgeable of the plan and the necessary actions to be taken in response to an allegation of sexual abuse.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.66	Preservation of ability to protect inmates from contact with abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>Interview with Agency Head</p> <p>Facility Administrator</p>

115.66 (a)(b)

he PAQ requires that neither the agency nor any other governmental entity responsible for collective bargaining on the agency's behalf shall enter into or renew any collective bargaining agreement or other agreement that limits 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.

Nothing in this standard shall restrict the entering into or renewal of agreements that govern: (1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §§ 115.72 and 115.76; or (2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated.

The facility provided

GEO Policy 5.1.2-A states, "GEO shall not enter into or renew any collective bargaining agreement or other agreement that limits a Facility's ability to remove alleged Employee sexual abusers from contact with any Individual in a GEO Facility or Program pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted." The policies also state, "In every case where the alleged abuser is an Employee, Contractor or Volunteer, there shall be no contact with the offender pending the outcome of an investigation."

Review of investigations demonstrates that HTCF will separate the victim from the accused staff member in both sexual abuse and harassment by placing the staff member in a position where there would be no contact with the offender. The one allegation of staff inappropriate touching included an order to keep the staff separate from the offender. This was noted as deficient in the annual facility assessment however was available for review during the onsite tour of the PREA auditor.

The agency head indicated that GEO would not enter into or renew any collective bargaining agreement or other agreement that limits a Facility's ability to remove alleged Employee sexual abusers from contact with any Individual in a GEO Facility or Program pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.

The facility administrator indicated that he could remove a staff member pending an investigation or place the employee in no-contact status pending investigation.

Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.

115.67 Agency protection against retaliation

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determinations:

GEO Corporate Policy 5.1.2-A

HTCF Policy 5.1.2

Retaliation Logs

PAQ

Interviews

Staff who provide retaliation monitoring, Facility Administrator

Agency Head

115.67 (a):

PAQ requires that the agency shall establish 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, and shall

Designate which staff members or departments are charged with monitoring retaliation.

The facility provides polices GEO Policy 5.1.2-A and HTCF Policy 5.1.2

GEO Policy 5.1.2-A requires the facility to implement procedures to protect offenders and employees who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by offenders or employees. The policies also state that the Facility PREA compliance manager and mental health personnel shall be responsible for monitoring retaliation of offenders in the facility. HTCF designated the PCM for monitoring retaliation.

15.67 (b):

The PAQ requires the agency shall employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

The facility provided:

The procedure states the agency has multiple protection measures, such as housing changes or transfers for offenders, victims, or abusers, removal of alleged staff or offender abusers from contact with victims, and emotional support services for offenders or staff who fear retaliation for reporting sexual abuse or sexual harassment

or for cooperating with investigations. If any other individual who cooperates with an investigation expresses a fear of retaliation, appropriate measures are taken to protect that individual against retaliation.

The PREA compliance manager serves as part of the Retaliation Monitoring Team. They indicated that, as part of the initial meeting, the offender is offered the opportunity to contact the victim advocacy center as soon as possible after being informed of an allegation.

115.67 (c):

The PAQ requires for at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and shall act promptly to remedy any such retaliation. Items the agency should monitor include inmate disciplinary reports, housing or program changes, and negative performance reviews or staff reassignments. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need for it.

The facility provided:

Offenders who are alleged to have committed sexual abuse will be monitored by the PREA Compliance Manager, who will meet weekly with the alleged victim beginning the week following the incident and continue monitoring weekly for at least 90 days or longer if there is a continuing need. The Human Resource Manager will monitor the conduct and treatment of employees who report staff misconduct or employee witnesses who cooperate with these investigations every 30 days for 90 days. Retaliation monitoring of offenders is documented on the GEO database program.

According to the PAQ, no offender was retaliated against by another offender or staff.

115.67 (d):

The PAQ requires that, in the case of inmates, such monitoring shall also include periodic status checks.

The facility provided:

The procedure also requires monitoring of the offender, including periodic status checks. The PREA compliance manager was interviewed and indicated that they would review the monitoring logs in the database on an ongoing basis and randomly inspect offenders during tours to check on their status.. In interviews, the staff indicated that they met with the alleged victim weekly for the first several weeks and then every other week for at least 90 days. This is documented on the Retaliation Log.

The PCM indicated that the facility's compliance director meets with the offenders when he is not available and also provides updates on periodic interviews with the detainees.

	<p>The agency head indicated in the interview that the agency is proactive in protecting victims of sexual abuse or sexual harassment. The Office of Professional Responsibility is notified and investigates any allegation of retaliation.</p> <p>The facility administrator indicated that the shift supervisor provides information to his office about the status of anyone who makes a report or has an allegation made against them.</p> <p>The PREA coordinator stated that all allegations retaliated against by staff will be referred to the Office of Professional Responsibility for investigation. They also indicated that staff who are accused of retaliation would be placed on administrative leave or with no contact status</p> <p>115.67 (e):</p> <p>The PAQ requires that if any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation.</p> <p>The facility provided:</p> <p>Policy 5.1.2 indicates that if any other individual expresses a fear of retaliation, the facility shall take appropriate measures to protect that individual as well.</p> <p>115.67 (f):</p> <p>The PAQ requires that an agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded.</p> <p>The facility provided that retaliation monitoring may be terminated if it is determined that the allegation was unfounded. The Retaliation monitor indicated that while the official monitoring will end, the facility would continue to check on the offender for retaliation for making a report.</p> <p>During the interview with the retaliation monitor, the facility compliance manager, the PREA compliance manager, and the Human Resource Manager, the information provided on the Pre-Audit Questionnaire indicates that, over the past 12 months, there have been no incidents of retaliation.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.68	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence relied upon in making the compliance determinations:

GEO Corporate Policy 5.1.2-A

At Risk Logs for 12 months.

Statement of Fact

Interview with Facility Administrator

115.68 (a)

PAQ requires that the agency have a policy prohibiting the placement of offenders who allege to have suffered sexual abuse in an involuntary restrictive housing unit unless an assessment of all available alternatives has been made. A determination has been made that there is no available alternative means of separation from likely abusers.

The facility provided:

GEO Corporate Policy 5.1.2-A requires that involuntary restrictive housing units may be used only after an assessment of available housing alternatives has shown that there is no other means of protecting the offender. Any use of a restrictive housing unit to protect an offender who is alleged to have suffered sexual abuse is subject to the requirements of 115.43.

During an interview with the facility administrator and through a site review, it was established that the facility does not have a restrictive housing unit or any single-cell housing unit to segregate offenders. The facility administrator indicated the facility would request that IDOC place offenders in the IDOC correctional facility located near HTCF. He noted that the facility has not placed a victim in the IDOC facility for a PREA-related incident in the last 12 months.

Policy 5.1.2-A mandates that any use of a restrictive housing unit to protect a prisoner who is alleged to have suffered sexual abuse or sexual harassment shall be subject to the requirements of "Protective Custody" (Section K) of this policy. This requirement is not limited to involuntary segregation and includes individuals who request protective custody because of an allegation of sexual abuse or sexual harassment.

During the tour of the facility, the auditor requested that the staff escort them to the Restrictive Housing Unit or any other area where offenders could be housed to segregate them from other offenders. The facility administrator and major indicated that they don't have an area to segregate offenders, except for holding units in Intake, which do not have beds and must be available for new intakes.

The facility administrator indicated that, as a last resort, if he could not protect the victim, he would require that the victim be transferred. He indicated he has not had to transfer or house a victim in any specialized area in the last 12 months.

Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.

115.71	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations, GEO Corporate Policy 5.1.2-E- PREA Investigation Procedure</p> <p>Investigative files Interviews</p> <p>Facility administrator</p> <p>Facility Investigators</p> <p>PREA coordinator</p> <p>115.71 (a):</p> <p>The PAQ requires the agency/facility has a policy related to criminal and administrative agency investigations.</p> <p>The facility provided GEO Corporate Policy 5.1.2-E and Investigative Reports.</p> <p>HTCF has implemented this policy to ensure that all allegations of sexual abuse or sexual harassment are referred for investigation to a law enforcement agency with legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The facility shall document all referrals. All allegations will include an administrative investigation that will be conducted by a trained facility investigator or a GEO Office of Professional Responsibility investigator.</p> <p>The investigative staff interviewed indicated that they first review the allegations and then notify the client and IDOC Police. If it is criminal in nature, they follow the response plan and protect the victim, crime scene, and evidence. The IDOC Police have always sent an investigator within two hours of receiving the call, and we immediately begin the investigation. If it is an administrative non-criminal investigation, I start as soon as I receive the allegation. I handle anonymous or third-party reports the same way.</p> <p>115.71 (b):</p> <p>The PAQ requires that, where sexual abuse is alleged, the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34</p> <p>The facility provided GEO Corporate Policy 5.1.2-E.</p> <p>GEO Corporate Policy 5.1.2-E requires that facilities shall use investigators who have received specialized training in Sexual Abuse investigations. 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</p>

required to substantiate a case for administrative action or prosecution referral. The facility has two trained investigators who have completed specialized training in the investigation of sexual abuse allegations in a confinement setting. The facility provided documentation of the completion of specialized investigative training by its investigators. The investigator was interviewed and was highly knowledgeable regarding conducting investigations in a confinement setting. Trained investigators conducted all investigations reviewed.

The auditor reviewed the Investigator Training curriculum and found it to be very comprehensive. Documentation was provided to the auditor, confirming that the investigator had received specialized training.

115.71 (c):

The PAQ requires 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.

The facility provided GEO Corporate Policy 5.1.2-E.

GEO policy 5.1.2-E mandates that it is the responsibility of investigators to gather and preserve circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data. Investigators will interview alleged victims, suspected perpetrators, and witnesses and review prior reports of sexual abuse involving the suspected perpetrator.

The facility investigator indicated that the first step is to review the allegation and then immediately ensure that the crime scene has been secured. This includes the victims, the abuser, and the area. I review videos, gather telephone information, and then conduct an interview with the victim. I don't know how long this will last. If it involves law enforcement, I have to hold everything until they arrive. If the ODOC Police indicate they are sending an investigator, then I have to wait until they arrive. Direct evidence is DNA, videos, telephone calls, SANE examinations, and pictures of the victim. Circumstantial evidence includes interviews, witness statements, and hearsay from informers.

15.71 (d):

The PAQ requires that when the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle to subsequent criminal prosecution.

The facility does not conduct criminal investigations. The investigator indicated that, based on the training they received, if the facility was conducting an investigation and the quality of the evidence appeared to support a criminal prosecution, the facility would conduct compelled interviews only after consulting with prosecutors to

determine whether compelled interviews might be an obstacle to subsequent criminal prosecution. However, if it is criminal in nature, we are required to stop our investigation and notify the IDOC Police to take over the investigation.

115.71 (e):

The PAQ requires that the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. No agency shall require an inmate 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.

The facility provided GEO Corporate Policy 5.1.2-E.

GEO Corporate Policy 5.1.2-E states that 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 an offender or staff member. An offender who alleges sexual abuse is never required to submit to a polygraph examination.

The investigator indicated they would base credibility on statements inconsistent with credible evidence, history, and overall demeanor during the interview. The offender is never required to take a polygraph or other truth-telling device.

115.71 (f)(g): The PAQ requires 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 written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

The PAQ requires that criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

The facility provided the GEO Corporate Policy 5.1.2-E and investigative files.

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

The facility investigator indicated that an administrative investigation is conducted on all allegations of sexual abuse or sexual harassment. Part of that investigation includes an effort to determine whether staff actions or failures to act contributed to the abuse.

Documentation includes all direct evidence, including videos, phone calls, and DNA. It consists of all interviews, the original allegations, housing assignments, referrals to IDOC Police, and/or the GEO Office of Professional Responsibility, and everything that was gathered in the investigation.

A criminal investigation shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence. The facility shall request a copy of completed investigative reports from the IDOC Police. Allegations will be tracked on the PREA Tracking Log.

The facility administrator indicated they have a good working relationship with IDOC Police and can get all of the criminal investigations unless it has been transferred to the prosecutor. Then, they will provide a case file number that we can utilize to find the status of the investigation.

There was one allegation of sexual abuse that was referred to Law Enforcement.

115.71 (h):

The PAQ requires that substantiated allegations of conduct that appear to be criminal shall be referred for prosecution.

GEO policy 5.1.2-E mandates that substantiated allegations of conduct that appear to be criminal shall be referred for criminal prosecution.

According to information reported on the Pre-Audit Questionnaire and in an interview with facility investigators, since the last PREA audit, there was one allegation of sexual abuse that is ongoing and has not been referred for prosecution at the time of the onsite audit.

115.71 (i):

The PAQ requires that the agency shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

The facility provided GEO Corporate Policy 5.1.2-E.

GEO Corporate Policy 5.1.2-E requires that the agency retain all written reports as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

115.71 (j):

The PAQ requires that the departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.

The facility provided GEO Corporate Policy 5.1.2-E.

GEO Corporate Policy 5.1.2-E requires that the departure of an alleged abuser or victim from employment or control of the facility or agency shall not provide a basis for terminating an investigation.

The facility investigator indicated in the interview that they would work with local law enforcement to gather any information that was not previously collected, such as statements. The facility will continue the investigation if the previous staff member

	<p>refuses to cooperate with the investigation. If it is an offender, they would contact the receiving facility investigator to aid in the investigation.</p> <p>The ongoing investigation involves a former staff member.</p> <p>115.71 (l)</p> <p>The PAQ requires that when outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.</p> <p>GEO Corporate Policy 5.1.2-E</p> <p>When outside agencies investigate sexual abuse allegations, the facility will cooperate with investigators and will try to remain informed about the progress of the investigation. In an interview with the PREA Coordinator, he reported that facilities are required to check in with outside investigators at a minimum of every 14 days and document that contact was made to ensure that requirements such as retaliation monitoring and notices of the outcome of investigations are completed as required. In an interview with facility investigators, they demonstrated knowledge of their responsibilities, including conducting administrative investigations of all received allegations and knowing when to refer claims that appear to be criminal for criminal investigation. The facility administrator indicated the facility has a close relationship with the IDOC Police. When conducting an investigation, they provide the facility with a case number, allowing the facility to contact the IDOC Police and inquire about the investigation's status using this number.</p> <p>There were two allegations of sexual abuse or sexual harassment in the last 12 months. One was criminal in nature and was forwarded for investigation by an outside entity. The facility-trained Investigator conducted the other investigation and found it sustained.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.72	Evidentiary standard for administrative investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations, GEO Corporate Policy 5.1.2-E.</p> <p>Report on Investigation: Investigator Training Curriculum</p> <p>Interview with Facility Investigator</p>

	<p>115.72 (a):</p> <p>The PAQ requires that the agency impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>The facility provided</p> <p>GEO Corporate Policy 5.1.2-E and the GEO Investigator training curriculum</p> <p>GEO Corporate Policy 5.1.2-E, and Investigator training indicate the facility shall impose no standard higher than the preponderance of evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Based on interviews with investigators, findings are categorized as Substantiated, Not Substantiated, Unfounded, or Pending Further Investigation. The findings will be based on the standard of proof of the preponderance of the evidence (51% of the evidence). The Investigator must objectively review all evidence that supports or contradicts the finding. The investigator must objectively consider and balance the evidence in favor of or contrary to the finding, and to support a finding of sexual abuse or harassment by a preponderance of evidence. Investigators must be convinced that the evidence in favor of the finding outweighs the evidence against the finding, or be confident that the evidence, when taken as a whole, shows that it is more probable than not that the alleged incident took place in this case.</p> <p>The auditor reviewed one completed investigative report and one investigative report that was considered non-PREA (consensual sexual activity) and noted that each report included findings based on the preponderance of the evidence.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.73	Reporting to inmates
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon in making compliance determinations,</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>GEO Corporate Policy 5.1.2-E</p> <p>Investigative Report</p> <p>Notification of investigative findings</p> <p>115.73 (a):</p>

The PAQ requires that, following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, the agency shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

The facility provided:

GEO policy 5.1.2-E,

GEO policy 5.1.2-E indicates that following an investigation of sexual abuse of an offender, the offender shall be informed in writing as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. The PREA Compliance Manager is responsible for preparing the Notification of Outcome of Allegation form and presenting it to the alleged victim for his signature. The offender receives a copy of the form, which is placed in the investigative file and forwarded to the PREA Coordinator's office. According to the PCM, a review of the investigative files confirmed that a notification was provided to offenders. There were four notifications to offenders found in the completed investigative file. All four notifications involved one completed investigation. The notification included offenders who left the facility without providing a mailing address, as well as inmates who were transferred and subsequently released without a mailing address or any means of contact.

115.73 (b):

The PAQ requires that if the agency did not conduct the investigation, it shall request the relevant information from the investigative agency to inform the inmate.

The facility provided GEO Corporate Policy 5.1.2-E.

Policy 5.1.2-E stated that if the agency did not conduct the investigation, it shall request the relevant information from the investigative agency to inform the inmate.

According to the policy and PREA compliance manager, if the facility did not conduct the investigation, the facility shall request the relevant information from the investigative agency to inform the offender.

115.73 (c):

The PAQ requires following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever: (1) The staff member is no longer posted within the inmate's unit; (2) The staff member is no longer employed at the facility; (3) The agency learns that the staff member has been indicted related to sexual abuse within the facility; or (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

GEO Policy 5.1.2-E requires following an offender's allegation that an employee has committed sexual abuse against the offender; the facility is required to inform the offender of the outcome of the investigation. The offender is to be informed if the

staff member is no longer posted within the offender's unit, if the staff member has been indicted on a charge related to sexual abuse within the facility, or if the staff member has been convicted on a charge related to sexual abuse within the facility.

117.73 (d):

The PAQ requires Following an inmate's allegation that he or she has been sexually abused by another inmate, the agency shall subsequently inform the alleged victim whenever: (1) The agency learns that the alleged abuser has been indicted related to sexual abuse within the facility; or (2) The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

GEO policy and procedure requires that, following an offender's allegation that another offender has sexually abused him, the agency will inform the alleged victim if the alleged abuser has been indicted related to sexual abuse within the facility or if the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

115.73 (e):

The PAQ requires that all notifications of the Outcome of Allegations or attempted notifications be documented and filed in the corresponding investigative file.

In interviews with the PREA compliance manager, he or the facility compliance manager meets with the offender and explains the outcome of the investigation. This helps offenders know what an unsubstantiated allegation means in layperson's terms. There were four notifications to offenders located in the investigative file for the previous 12 months. All notifications involved one allegation of sexual abuse.

Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.

115.76	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence relied upon in making the compliance determinations: GEO Corporate Policy 5.1.2-A Investigative Files Interview with Facility Administrator Facility PREA Compliance Manager

Facility Investigator

115.76 (a):

PAQ requires That Staff shall be subject to disciplinary sanctions, up to and including termination, for violating agency sexual abuse or sexual harassment policies.

The facility provided GEO Corporate Policy 5.1.2-A.

GEO corporate policy 5.1.2-A outlines disciplinary action and employee disciplinary sanctions. Discipline up to and including termination can be imposed for substantiated violations of sexual abuse or sexual harassment policies.

Based on the PAQ and review of investigative files, no person was terminated for violation of sexual abuse or sexual harassment policies during the last 12 months. The investigation involved a staff member touching an offender's buttocks during a strip search.

115.76 (b):

PAQ requires termination to be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

The facility provided GEO Corporate Policy 5.1.2-A.

Based on GEO policy 5.1.2-A, termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Based on the PAQ and review of investigative files, no person resigned instead of termination during the last 12 months.

115.76 (c):

PAQ requires 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 facility provided GEO Corporate Policy 5.1.2-A. 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. Two staff members have been disciplined for violations of PREA standards in the last 12 months.

!15.76 (d):

PAQ requires that all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the

	<p>activity was clearly not criminal, and to any relevant licensing bodies.</p> <p>GEO Corporate Policy 5.1.2-A mandate all terminations for violations of the agency's policies on sexual abuse and sexual harassment, or resignations, shall be reported to law enforcement and licensing agencies unless the activity was not criminal. During the interview with the facility administrator, the information provided by the facility investigator indicated that one staff member had resigned during the investigation, which is considered a presumptive termination if the allegation is substantiated. At the time of the onsite auditor review, the investigation was ongoing.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required</p>
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115.77	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations,</p> <p>GEO Corporate Policy 5.1.2-A GEO Corporate Policy 5.1.2-E Statement of fact</p> <p>PAQ</p> <p>115.77 (a):</p> <p>FAQ requires that any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.</p> <p>The facility provided GEO Corporate Policy 5.1.2-A.</p> <p>GEO Corporate Policy 5.1.2-A and HCTF Policy 5.1.2 mandate that any contractor or volunteer who engages in sexual abuse/sexual harassment would be prohibited from contact with offenders and would be reported to the appropriate investigator and law enforcement or relevant professional licensing/ certifying bodies unless the activity was clearly not criminal. Any contractor or volunteer who engages in sexual abuse, even though it was not criminal, will be reported to professional licensing/certifying bodies.</p> <p>115.77 (b):</p> <p>The PAQ requires the facility to take appropriate remedial measures and considers whether to prohibit further contact with inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>The facility provided GEO Corporate Policy 5.1.2-A.</p>

	<p>GEO Corporate Policy 5.1.2-A mandates that, in cases not involving criminal activity, the facility take appropriate remedial measures and consider prohibiting further contact with offenders.</p> <p>During the previous year, there were no incidents where a contractor or volunteer was accused of, suspected, or found guilty of sexual abuse or sexual harassment at HTCF.</p> <p>The facility administrator's interview indicated he would take immediate action to remove the contractor or volunteer from contact with offenders. He would pull their identification cards and post a notice at the front entrance, stating that they were not to be allowed access to the facility. If it were a contractor, the administrator indicated that he would notify the contractor's supervisor immediately so that the supervisor could provide a replacement staff member for the task.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.78	Disciplinary sanctions for inmates
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The following policies, directives, and documentation were reviewed in formulating compliance with this standard:</p> <p>GEO Corporate Policy 5.1.2-E</p> <p>IDOC Pamphlet for Disciplinary Procedures for Adult Offenders</p> <p>Offender Handbook</p> <p>PREA Posters of Zero Tolerance</p> <p>115.78 (a):</p> <p>The PAQ requires inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.</p> <p>The facility provided GEO Corporate Policy 5.1.2-E, IDOC Pamphlet for Disciplinary Procedures for Adult Offenders.</p> <p>Pamphlet for Disciplinary Procedures for Adult Offenders</p> <p>Indicates:</p>

IDOC AP 02-04-101, "The Disciplinary Code for Adult Offenders," establishes the rules of conduct for offenders committed to the Department of Correction and the procedures to be followed by staff and offenders when imposing disciplinary actions.

IDOC AP 02-04-101 encourages self-discipline and self-control and assists in preparing the offender for re-entry into the community by setting rules to be followed. This policy serves as a means for the Department to manage offenders in a just and fair manner to ensure the safety and security of the facilities, staff, and offenders. Sexual Contact is considered a class B - serious allegation.

Corporate policy 5.1.2-E, and the Offender Disciplinary explanation pamphlet outline discipline and prosecution related to disciplinary sanctions for offenders.

Corporate policy 5.1.2-E indicates Individuals in a GEO facility Disciplinary Sanctions (§115.78/§115.278)

- a. Individuals in a GEO facility who are found guilty of engaging in sexual abuse involving other individuals in a GEO facility (either through administrative or criminal investigations) shall be subject to formal disciplinary sanctions.
- b. Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the individual's disciplinary history, and the sanctions imposed for comparable offenses by other individuals with similar histories.
- c. 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.
- d. If the facility offers counseling or other interventions designed to address the reasons or motivations for the abuse, the facility shall consider requiring the offending individual to participate as a condition of access to programming or other benefits.
- e. Disciplining an individual in a GEO facility for sexual contact with an employee is prohibited unless it is found that the employee did not consent to the contact.
- f. A report of sexual abuse made in good faith by an individual in a GEO facility, based upon a reasonable belief that the alleged conduct occurred, will not constitute false reporting or lying.
- g. Facilities may not deem that sexual activity between individuals in a GEO facility is sexual abuse unless it is determined that the activity was coerced.
- h. The PREA compliance manager shall receive copies of all disciplinary reports regarding sexual activity, sexual harassment, and sexual abuse for monitoring purposes.
- i. The incident shall be reported to law enforcement unless the activity was clearly not criminal

The facility administrator interviewed indicated that sanctions are included as part of

our internal disciplinary process or criminal sanctions, as opposed to those imposed by law enforcement following a criminal finding of guilt.

115.78 (b)(c):

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

The PAQ requires the disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

GEO Corporate Policy 5.1.2-E states that allegations of sexual abuse and sexual harassment are taken very seriously, as are the sanctions imposed for violating the zero-tolerance policy, and that before disciplinary hearings at the facility, considerations of the nature of the crime, disciplinary history and similar sanctions imposed for comparable violations are discussed with the goal of the disciplinary team coming to consensus on the imposed sanction.

As required by 5.1.2, the offenders' mental disabilities or mental illness are discussed as possibly contributing to the violation. Each offender is seen by mental health staff before the disciplinary hearing and guided by the disciplinary staff.

This was confirmed by reviewing disciplinary hearing files.

The facility administrator interviewed indicated that, before the hearing, mental health staff would evaluate the offender to consider any mental disabilities or mental illness when determining sanctions.

115.78 (d):

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

The facility provided GEO Corporate Policy 5.1.2-E,

GEO Corporate Policy 5.1.2-E mandates that all facilities shall attempt to conduct a mental health evaluation of all known inmate-on-inmate or resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. Note: "Known abusers" are those inmate or resident abusers in whom a PREA investigation determined the allegation was substantiated either administratively or by outside law enforcement.

The HTCF facility does provide mental health interventions for its offenders. In discussion with mental health staff, generally the interventions are general in a Sex Offender program with group settings. Still, in cases of offenders with mental illness, one-on-one counseling can occur.

The PCM acknowledged utilizing the services of mental health staff on an as-needed basis for offender therapy; however, in most cases, the IDOC would mandate the offender be transferred to a Sex Offender program.

115.78 (e):

The PAQ requires that the agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

The facility provided GEO Corporate Policy 5.1.2-E, which prohibits disciplining an offender for sexual contact with an employee unless it is found that the employee did not consent to the contact. There were no reports of sexual abuse by an offender on staff in the past 12 months at HTCF.

115.78 (f):

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

The facility provided GEO Corporate Policy 5.1.2-E,

GEO Corporate Policy 5.1.2-E states that a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

115.78 (g):

The PAQ requires that an agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

The facility provided GEO Corporate Policy 5.1.2-E and Pamphlet for Disciplinary Procedures for Adult Offenders.

The agency and HTCF have a zero-tolerance policy for sexual abuse and sexual harassment, and policy 5.1.2-E and Pamphlet for Disciplinary Procedures for Adult Offenders outline the potential sanctions for sexual abuse and sexual harassment. Facility PREA posters, videos, education, and training outline the potential sanctions for sexual abuse and sexual harassment. The HTCF PCM acknowledged that allegations are sometimes made, but through investigation, it is determined that the behavior was not coerced. In that case, offenders are not disciplined.

The auditor reviewed one investigative file that was determined consensual and noted there were no disciplinary actions associated with a PREA violation, as the report was included in the facility's investigative tracking system.

Based on this analysis, the facility is substantially compliant with this provision, and

	corrective action is not required
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115.81	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations, GEO Corporate Policy 5.1.2-A</p> <p>Facility Intake Risk Assessment Referral to MH</p> <p>Consent for Mental Health Services form Mental Health Evaluations</p> <p>115.81(a).</p> <p>The PAQ requires that if the screening under § 115.41 indicates that a prison/jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.</p> <p>The facility provided GEO Corporate Policy 5.1.2-A, Facility Intake Assessment, and Referral to MH.</p> <p>GEO Corporate Policy 5.1.2-A requires that during the initial PREA Screening, if the offender reports prior sexual victimization, whether in an institutional setting or in the community, staff will ensure the offender will be referred to mental health for further evaluation within 14 days. Upon reviewing the 30-day follow-up assessments, the offender discloses prior victimization not reported during the initial screening. The PREA Compliance Manager will then refer the offender to mental health for further evaluation. Medical and mental health providers, according to their professional judgment, determine the nature and scope of these services. In the information reported on the Pre-Audit Questionnaire, 100% of the offenders assigned to the facility in the past 12 months who disclosed prior victimization were offered a follow-up meeting with the Mental Health Provider. At the time of the audit, three offenders claimed prior victimization. The auditor reviewed resident screening files, and referrals were documented for all offenders who claimed prior victimization or were considered to be at risk of victimization. As part of the interviews of offenders, some offenders were considered at risk of victimization by the intake staff, case managers, and medical practitioners. Each interviewee indicated that the mental health professional saw them during their first or second day at the center.</p> <p>Two offenders who had a history of victimization were interviewed. Each indicated that the nurse interviewed them upon arrival at the facility and was asked about being a victim of sexual abuse or exploitation. They indicated they had, and the</p>

medical staff notified the mental health staff. During the screening, they were asked the same question and revealed that they had spoken to a Mental Health Professional during their medical screening.

One of the victims refused mental health services. One of the offenders indicated they are still seeing a mental health professional.

115.81 (b):

The PAQ requires that 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, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.

In the past 12 months, 100 percent of inmates who have previously perpetrated sexual abuse, as indicated during the screening, were offered a follow-up meeting with a mental health practitioner:

The facility provided GEO Corporate Policy 5.1.2-A, Facility Intake Assessment, and Referral to MH

Any offender who reports during initial PREA screening or in follow-up screenings that they have previously perpetrated sexual abuse in an institutional setting or the community will be offered a follow-up meeting with medical or mental health within 14 days of the screening. No offender claimed he perpetrated sexual abuse.

115.81 (c)(d)(e): The facility is a correctional facility and operates under the prison standards.

The PAQ requires that medical and mental health practitioners obtain informed consent.

Consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

Any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

Medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

The facility provided intake medical/ mental health evaluations, including Consent for Service forms, and interviews with medical and mental health staff.

Medical and mental health staff have offenders sign for treatment or services upon arrival at the center. Based on interviews, medical and mental health staff indicated

	<p>they would be required to get consent on reporting information about prior sexual victimization that did not occur in an institutional setting unless the victimization occurred when the offender was under the age of 18.</p> <p>Based on interviews with mental health services, offenders who report prior sexual victimization and those who disclose previously perpetrating sexual abuse are being referred for evaluation, and consent forms or refusals are being obtained. The Mental Health provider indicated that he makes himself available when new intakes arrive at the facility and tries to see each of the new intakes. They noted that if any resident claims prior victimization or offenders are identified as being at risk by the screeners, they are seen upon arrival and spoken with in private, with an offer of a follow-up meeting on the same day or the following day.</p> <p>The medical staff sees offenders who are at risk of being victimized on an ongoing basis. If they indicate they would like to continue seeing a mental health provider after the initial interview based on the intake screening, the offender is placed on the mental health provider's case load and seen either weekly or monthly.</p> <p>Mental Health and Medical files are maintained in the medical area and are off limits to all non-medical or mental health staff. The mental health staff provided documentation of the screening instrument, referral, and their corresponding clinical notes. All information is kept in secure files and off limits to all other staff.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.82	Access to emergency medical and mental health services
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations.</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>Coordinated Response Plan</p> <p>Medical and Mental Health assessments</p> <p>Interviews with</p> <p>Medical Staff,</p> <p>Mental Health Staff,</p> <p>First Responders</p> <p>Indiana Coalition Against Domestic Violence Contract with IDOC</p>

and an interview with the program director.

115.82 (a):

PAQ requires that Inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.

The facility provided Policy GEO Corporate Policy 5.1.2-A, and mental health/medical staff interviews.

GEO policy 5.1.2-A states, "Victims of sexual abuse in custody shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services as directed by medical and mental health practitioners. This access includes offering timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, where medically appropriate. 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.

Medical staff interviews indicated that the facility has a medical staff on site twenty hours a day and utilizes Hendricks County Medical Center for medical SANE services. The Medical Center was contacted, and they indicated that they have a SANE staff on call 24 hours a day.

The mental health staff interviewed indicated they are on duty 12 hours a day and have on-call staff at all other times.

115.82 (b):

The PAQ requires that if no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim under § 115.62 and shall immediately notify the appropriate medical and mental health practitioners.

The facility provided Policy 15.1.2-A and conducted interviews with first responders.

All staff first responders are trained to take preliminary steps to protect the victim and notify medical and mental health practitioners. Both security and non-security staff interviewed knew their first responder duties. Forensic exams are not performed by facility medical staff.

115.82 (c)(d):

The PAQ requires that victims of sexual abuse while incarcerated be offered timely information about and timely access to emergency contraception and sexual assault services.

Transmitted infections prophylaxis, by professionally accepted standards of care, where medically appropriate.

	<p>Treatment services shall be 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.</p> <p>The facility provided GEO Corporate Policy 5.1.2-A</p> <p>Offender victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency sexually transmitted infections prophylaxis, by professionally accepted standards of care, where medically appropriate. All services are provided without financial cost to the victim, regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Medical staff indicated that it is part of the SANE process, and she would follow up when the offender returns to the facility. There is no charge to the offender for medical services.</p> <p>IDOC has a contract with the Indiana Coalition Against Domestic Violence to provide crisis intervention services. All services are provided at no cost to offenders, regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Medical Staff interviewed reported that victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. They also stated that once the report is received, the offender will be seen immediately. The medical and mental health staff verified that the professional judgment of the medical and mental health treatment staff determines the nature and scope of the treatment and crisis intervention services. She also verified that they offer information about and timely access to sexually transmitted infections prophylaxis, where medically appropriate. An interview with a Mental Health Director verified that mental health also meets with an offender within 24 hours of an alleged incident of sexual abuse to offer supportive counseling.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.83	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations.</p> <p>GEO Corporate Policy 5.1.2-A,</p> <p>Mental Health evaluations</p> <p>Interviews with Mental Health staff</p>

115.83(a):

The PAQ requires the facility shall 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.

The facility provided policy GEO Corporate Policy 5.1.2-A, medical and mental health staff interviews, and mental health evaluations.

GEO Corporate Policy 5.1.2-A outlines ongoing actions after reports of sexual abuse. Medical and mental health evaluations, and treatment where appropriate will be provided to all victims of sexual abuse that occur in any prison, jail, lockup, or juvenile facility.

According to interviews with medical and mental health staff. HTCF will offer medical and mental health evaluations (and treatment where appropriate) to all victims of Sexual Abuse that occurs in any prison, jail, lockup, or juvenile Facility.

115.83 (b)

The PAQ requires that the evaluation and treatment of such victims shall 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.

The facility provided policy 5.1.2, which included interviews with medical and mental health staff.

The mental health and medical staff interviews indicated that if an offender went to the hospital for a SANE, the hospital would send a discharge summary and mental health evaluation with the offender. The medical staff indicated that they would call the clinical director, review the discharge summary, and implement the hospital's recommendations. The mental health staff indicated that they would conduct a mental health screening, develop a treatment plan, and implement the required services.

115.83 (c)(d)(e)(f):

The PAQ requires that the facility shall provide such victims with medical and mental health services consistent with the community level of care

The evaluation and treatment should include follow-up services, treatment plans, and (when necessary) referrals for continued care following a transfer or release. These services shall be provided in a manner that is consistent with the level of care the individual receives in the community.

According to an interview with the medical staff, they stated that the level of care provided is at least equal to or better than the community level of care. They also verified that victims of sexual abuse are offered information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, where

medically appropriate. Services are provided at no charge to the offender.

The facility provides victims with medical and mental health care consistent with the community level of care, as confirmed by an interview with the nurse. The facility has a full-time medical staff and offers 16 hours of mental health services, with on-call mental health staff available as needed. The facility offers emotional support through a local victim advocacy program, which provides a hotline.

The facility is an all-male correctional facility.

The facility provided policy GEO Corporate Policy 5.1.2-A, medical file review, mental health referrals, and an interview with medical and mental health staff.

Inmate victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.

Victims shall also be offered tests for sexually transmitted infections as medically appropriate. All services shall be provided without financial cost to the victim.

Treatment services shall be provided to the victims without financial cost, regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

115.83 (g):

The PAQ requires that Treatment services shall be 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.

The facility provided policy GEO Corporate Policy 5.1.2-A.

Policy 5.1.2-A mandates that all services shall be provided without financial cost to the victim, regardless of whether the victim names their abuser or cooperates with any investigation arising from the incident.

115.83 (h)

The PAQ requires all prisons to 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.

The facility provided policy GEO Corporate Policy 5.1.2-E, and Mental Health staff interviews.

The staff of Indiana Coalition Against Domestic Violence indicated victims of sexual assault would be provided aftercare services, including meeting with emotional support staff at the detention facility and follow-up when they leave the center. She indicated that the program has outreach programs in the majority of programs in Indiana.

Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.

115.86	Sexual abuse incident reviews
	<p data-bbox="256 188 991 221">Auditor Overall Determination: Exceeds Standard</p> <hr/> <p data-bbox="256 264 544 297">Auditor Discussion</p> <hr/> <p data-bbox="256 340 1150 374">Evidence relied upon in making the compliance determinations</p> <p data-bbox="256 416 671 450">GEO Corporate Policy 5.1.2-A</p> <p data-bbox="256 490 544 524">Investigation Report</p> <p data-bbox="256 564 943 598">Incident Review Committee (After Action Report)</p> <p data-bbox="256 638 600 672">After Action Report (IRT)</p> <p data-bbox="256 712 320 745">PAQ</p> <p data-bbox="256 786 416 819">115.86 (a):</p> <p data-bbox="256 860 1477 972">The PAQ requires that 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.</p> <p data-bbox="256 1012 1390 1079">The facility provided GEO Corporate Policy 5.1.2-A, and a review by the Incident Review Committee.</p> <p data-bbox="256 1120 1469 1321">GEO policy 5.1.2-A requires the facility to conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation in which the allegation has been determined to be substantiated or unsubstantiated. At the time of the PAQ, there was one investigation that required an incident review team meeting. GEO has developed an Incident Review Committee report that contains all</p> <p data-bbox="256 1361 967 1395">The elements of an incident review team meeting.</p> <p data-bbox="256 1435 416 1469">115.86 (b):</p> <p data-bbox="256 1509 1430 1576">The PAQ requires that the review be conducted within 30 days of the conclusion of the investigation.</p> <p data-bbox="256 1617 967 1650">The facility provided GEO Corporate Policy 5.1.2-A</p> <p data-bbox="256 1691 1461 1758">GEO Corporate Policy 5.1.2-A mandates that the review be conducted within 30 days of the conclusion of the investigation.</p> <p data-bbox="256 1798 1430 1865">A review of all the Incident Review Committee reports found that it was completed within 30 days after the completion of the investigation.</p> <p data-bbox="256 1906 416 1939">115.86 (c):</p> <p data-bbox="256 1980 1414 2047">The PAQ requires the review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health</p>

practitioners.

The facility provided GEO Corporate Policy 5.1.2-A and an after-action report, which included a sign-in sheet for participants.

The Incident Review Committee consists of the facility director, Chief of Security, PREA Compliance Manager, Lead Investigator, Classification Supervisor, and the nurse. The PREA Coordinator or his staff may attend via telephone or in person.

115.86 (d):

The PAQ requires the review team shall: (1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; (2) Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; (3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; (4) Assess the adequacy of staffing levels in that area during different shifts; (5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and (6) Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submit such report to the facility head and PREA compliance manager.

The facility provided GEO Corporate Policy 5.1.2-A and an after-action report.

A review of the Incident Review Committee documented that the team considers whether the incident was motivated by race, ethnicity, gender identity, or perceived status or gang affiliation. The team examines the area where the incident was alleged to have occurred and assesses whether physical barriers in the area may have contributed to the abuse, whether monitoring technology should be deployed or augmented, and whether the staffing levels at the time of the incident were adequate.

The PREA compliance manager serves on the committee and works with the team to Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submit such report to the facility head and PREA compliance manager. There was one after-action reports completed during the last 12 months.

115.86 (e):

The PAQ requires the facility to implement the recommendations for improvement or document its reasons for not doing so.

The facility provided GEO Corporate Policy 5.1.2-A and an after-action report.

In interviews with the facility administrator and PREA compliance manager. As part of

	<p>the after-action report, the facility submits the report to the corporate office for approval. The facility then develops an after-action report and a Corrective Action Plan that is also submitted to the corporate office. The facility completes the corrective action plan and submits the completed documentation to the corporate office.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.87	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determination.</p> <p>GEO Corporate Annual Report</p> <p>GEO Corporate Policy 5.1.2-A</p> <p>HTCF Sexual Abuse Prevention Annual Report</p> <p>Facility annual PREA assessment</p> <p>GEO Group Annual Reports (2012-2024)</p> <p>www.geogroup.com/media/mxbaq0bd/prea-annual-report-2024_external.pdf</p> <p>115.87 (a):</p> <p>The PAQ requires that the agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and a set of definitions.</p> <p>The facility provided GEO Corporate Policy 5.1.2-A and the GEO Corporate Annual Report.</p> <p>GEO policy 5.1.2-A mandates that all facilities under the GEO umbrella collect uniform data for every allegation of sexual abuse at all facilities under their control. GEO requires facilities to utilize a standardized instrument that includes clearly defined definitions. The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</p> <p>115.87 (b):</p> <p>The PAQ requires the agency to aggregate the incident-based sexual abuse data at least annually.</p>

The facility provided GEO Corporate Policy 5.1.2-A

Policy 5.1.2-A mandates that the Facility PREA Compliance Managers shall be responsible for compiling data collected on sexual activity, sexual harassment, and sexual abuse incidents and forwarding statistical reports to the Corporate PREA Coordinator. The PREA Compliance Manager ensures that data is compiled and submitted to the PREA Coordinator every month using the Monthly PREA Incident Tracking Log. In addition to submitting the Monthly PREA Incident Tracking Log, the PREA Compliance Manager ensures that a PREA Survey is created, updated, and submitted for review and approval in the PREA Portal for every allegation of sexual abuse, sexual harassment, sexual activity, and voyeurism. At least annually, the PREA Coordinator aggregates this data.

The PREA Compliance manager submits an annual report of all sexual abuse, sexual harassment, and staff sexual misconduct to the regional supervisor each year.

The PREA compliance manager indicated that the same information is provided to the Corporate PREA coordinator yearly.

115.87 (c)(d):

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

The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and reviews of sexual abuse incidents.

The facility provided GEO Corporate Policy 5.1.2-A and the GEO Corporate Annual Report.

Policy 5.1.2-A mandates that the data collected will be, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Bureau of Justice Statistics (BJS). A review of the annual report codified this requirement. The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and reviews of sexual abuse incidents.

In an interview with the PREA coordinator, all allegations of sexual abuse and sexual harassment are reviewed by the regional PREA coordinator team members, the Corporate investigative unit, facility administrator, and regional supervisor. The yearly report is reviewed during the facility's PREA assessment.

115.87 (e):

The PAQ requires the agency to also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.

This provision of this standard does not apply to this facility. The agency does not

	<p>contract for the confinement of offenders.</p> <p>115.87 (f):</p> <p>Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice by June 30.</p> <p>According to an interview with the PREA coordinator, upon request, GEO shall provide such data from the previous calendar year to the Department of Justice by June 30.</p> <p>The facility provided copies of the monthly and annual logs for review. The log contained all elements required by policy.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.88	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations,</p> <p>GEO Corporate PREA Procedure 5.1.2-A</p> <p>GEO Annual PREA Data Comparative Report 2023-2024</p> <p>PREA annual assessment 2024.</p> <p>115.88 (a):</p> <p>The PAQ requires the agency shall 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: (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 as a whole.</p> <p>The facility provided GEO Corporate PREA Procedure 5.1.2, GEO Annual PREA Data Comparative Report 2022 -2024</p> <p>GEO Policy 5.1.2-A 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 as a whole.</p>

Such reports shall include a comparison of the current year's data and corrective actions with those from prior years. They shall provide an assessment of GEO's progress in addressing sexual abuse. 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. 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.

The agency head interview indicated that reports shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.

The agency coordinator interview indicated that the agency reviews 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 and training. (115.88) Additionally, all our clients, except USMS, include GEO PREA data in their annual PREA reports. Facilities conduct sexual abuse incident reviews after each substantiated or unsubstantiated case. Any recommendations for improvement, problem areas identified, or corrective actions needed are documented and forwarded to the corporate PREA coordinator to review. GEO has a secure PREA Portal with restricted access to retain all the PREA data. Every incident is entered into the portal by the PREA managers at each facility, and annually, our corporate PREA team reviews this data to determine what improvements are needed to enhance the PREA program.

These recommended improvements are submitted to the appropriate divisional authority for Secure Services and Reentry Services annually for review and approval.

The agency reviews 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 and training. (115.88)

Additionally, all our clients, except USMS, include GEO PREA data in their annual PREA reports.

115.88 (b)(c):

The PAQ requires that Such a report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.

The PAQ requires the agency's report shall be 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.

The facility provided GEO Corporate PREA Procedure 5.1.2, GEO Annual PREA Data Comparative Report 2023 -2024.

The PREA Coordinator reviews the data collected, and the annual report includes a comparison of the current year's data and corrective actions with those from prior

years and provides an assessment of the agency's progress in addressing sexual abuse. This information is also captured in the annual PREA assessment completed by the PREA coordinator's staff.

The PAQ requires the agency's report shall be 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.

The PREA Coordinator forwards the annual report to the Senior Vice President of GEO Care and the Senior Vice President, US Secure Services and International Operations, for their signatures and approval. The report is made public on the GEO website at <https://www.geogroup.com/prea>.

The agency head and PREA coordinator interviews indicated that our annual PREA reports are approved by the appropriate divisional authority for Secure Services and the GEO Group CEO.

A review of the annual reports verified the information provided by these interviews.

115.88 (d):

The PAQ requires that the agency 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.

The facility provided GEO Corporate PREA Procedure 5.1.2, GEO Annual PREA Data Report 2024.

Before making aggregated sexual abuse data public, all personal identifiers are redacted as stated on the last page of GEO's annual report.

The PREA coordinator interviewed indicated that GEO only reports statistical data and incident types, excluding personally identifiable information for confidentiality purposes.

A review of the GEO website for the last 3 years confirmed the findings of the assessment team. The GEO annual report provides more information than is required and, at the same time, offers the person reviewing the report a detailed look at PREA in action in GEO facilities.

Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.

115.89	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence relied upon in making the compliance determinations

GEO Corporate PREA Procedure 5.1.2-A

GEO Annual PREA Data Report

Interviews with

PREA compliance manager,

PREA Coordinator

115.89 a):

The PAQ requires the agency shall ensure that data collected pursuant to § 115.87 are securely retained.

The facility provided GEO Corporate Policy 5.1.2-A and an interview with the PREA compliance manager and the PREA coordinator.

Policy 5.1.2-A mandates that all case records associated with claims of sexual abuse be maintained and filed in a secure file cabinet in the PREA compliance manager's office. During the tour of the facility, the auditor noted that the PREA compliance office was locked in each visit by her office. The auditor was required to return all investigative files to the PREA compliance manager when leaving the conference room during the review of investigative files. The auditor noted that all computers in the case manager, medical, and mental health areas were closed if no one was in the offices. Interviews with case managers indicated that they do not have access to investigative files on their GEO database.

The agency head interviewed indicated that GEO has a secure PREA portal with restricted access to retain all the PREA data. Every incident is entered into the portal by the PREA managers at each facility and annually.

115.89 (b):

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

The facility provided GEO Corporate PREA Procedure 5.1.2-A and <https://www.geogroup.com/prea>.

GEO makes all aggregated sexual abuse data from all its facilities public annually on its website at <https://www.geogroup.com/prea>. A review of the website confirmed that the agency has uploaded PREA reports from 2017 to 2023 to the website above.

115.89 (c):

The PAQ requires that, before making aggregated sexual abuse data publicly

	<p>available, the agency shall remove all personal identifiers.</p> <p>The facility provided the GEO Corporate PREA Procedure 5.1.2-A and an interview with the PREA coordinator.</p> <p>Before making aggregated sexual abuse data public, GEO removes all personal identifiers. This was confirmed by reviewing past audits and GEO annual reports.</p> <p>The PREA coordinator interviewed indicated that GEO only reports statistical data and incident types, excluding personally identifiable information, for confidentiality purposes</p> <p>115.89 (d):</p> <p>The PAQ requires that the agency shall maintain sexual abuse data collected pursuant to §115.89 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</p> <p>The facility provided GEO Corporate PREA Procedure 5.1.2-A.</p> <p>Corporate Policy: 5.1.2-A mandate that data collected according to this procedure shall be securely retained by the Facility or Corporate office for at least 10 years or longer if required by state statute. Before making aggregated sexual abuse data publicly available, all personal identifiers must be removed. All case records associated with claims of sexual abuse, including incident reports, investigative reports, offender information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/ or Counseling, are retained by Federal and state statutes and guidelines specified by the contract authority. Confinement Facilities ensure that the data collected is securely retained for at least 10 years.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations, GEO policy 5.1.2-A</p> <p>115.401 (a):</p> <p>The PAQ requires that, during the three-year period starting on August 20, 2013, and during each three years thereafter, the agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once.</p>

The facility provided GEO policy 5.1.2-A

GEO policy 5.1.2-A requires that during the three-year period starting on August 20, 2013, and each three-year period thereafter, GEO's Contract Compliance Department ensure that a PREA auditor who has been certified through the Department of Justice audits each facility at least once. The initial PREA audit of The HTCF was conducted in March 2016 by a DOJ-certified PREA auditor. The second audit was conducted in April 2019 by a DOJ-certified auditor. This is the third audit was performed by a certified PREA auditor in February 2022. This is the fourth PREA audit of Heritage Trail Correctional Facility.

According to GEO's PREA Coordinator and the annual PREA report, during the three-year period beginning on August 20, 2013, GEO ensured that each of its facilities was audited at least once and continues to ensure that its facilities are audited every three years.

115.401 (b):

The PAQ requires that during each one-year period starting on August 20, 2013, the agency shall ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, is audited.

According to GEO's PREA Coordinator and the annual PREA report, during the three-year period beginning on August 20, 2013, GEO ensured that each of its facilities was audited at least once and continues to ensure that its facilities are audited every three years.

115.401 (h):

The PAQ requires the auditor shall have access to, and shall observe, all areas of the audited facilities.

The auditor had full, unfettered access to all data and documentation, all staff and offenders, and all contractors and volunteers. Access to offender, staff, investigative files, and training records, as well as intake, classification, and risk assessment records, was made available throughout the audit process. The auditor was provided with various logs, including allegations, referrals to medical and mental health, and retaliation monitoring. Housing logbooks that showed unannounced rounds, offender movement, and other operational information for each housing location were available. All interviews, including those with random staff, targeted offenders, and specialized staff, were conducted privately. There were no refusals for interviews. Sexual safety and the safety of staff and offenders at the HTCF are top priorities. All areas of the facility were observed during the original tour of the facility. During the on-site audit, the auditor reviewed several areas of the facility. Staff and offenders were randomly interviewed during the tour. The facility staff allowed the auditor unfettered access to talk to staff and offenders privately.

115.401 (i):

The PAQ requires that the auditor be permitted to request and receive copies of any

	<p>relevant documents (including electronically stored information).</p> <p>I requested personnel files, offender files, training records, investigation files, logbooks, and pertinent forms utilized to conduct the requirements of the audit process. The facility allowed the audit to review personnel files and mark documents needed from each of the files reviewed. All other documentation required was provided to the auditor in a timely manner.</p> <p>115.401 (m):</p> <p>The PAQ requires the auditor shall be permitted to conduct private interviews with offenders.</p> <p>I interviewed specialized staff, random staff, random offenders, and targeted offenders during the onsite audit. Interviews were conducted in a private office and classroom area of the facility.</p> <p>115.401 (n):</p> <p>The PAQ requires inmates shall be permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.</p> <p>Offenders were notified a minimum of six weeks before the onsite audit on posted facility notices in English and Spanish that they could send confidential correspondence to the Auditor. Interviews with offenders stated that they had seen a posting. No offender contacted the Auditor before or during the audit.</p> <p>The staff responsible for the mail was interviewed. She indicated that all mail addresses to legal entities and the PREA auditor are treated as confidential and private, and she only places a stamp on the mail and sends it to the addressed entity.</p> <p>Based on this analysis, the facility is substantially compliant with this provision, and corrective action is not required</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations</p> <p>PREA audit reports</p> <p>https://www.geogroup.com/prea</p> <p>115.403 (f):</p>

The PAQ requires that the agency shall ensure that the auditor's final report is published on the agency's website if it has one, or is otherwise made readily available to the public.

Per agency policy and standard requirements, GEO assures me that this final report will be published on their website at (<https://www.geogroup.com/prea>) to be available to the public. This is the fourth PREA audit of Heritage Trail Correctional Facility.

According to interviews with the PREA coordinator, the audit reports are posted on the website within the 90-day requirement. The postings from 2017 until the present are posted on the GEO website. All contracting entities, except the US Marshal Services, post the PREA audit on their respective website or forums.

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.)	na
	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	na

	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)?	na
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.)	na
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.)	yes
115.22 (a)	Policies to ensure referrals of allegations for investigations	

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	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.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	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)		
	<p>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.)</p>	yes