

# PREA AUDIT: AUDITOR'S SUMMARY REPORT

## ADULT PRISONS & JAILS



<b>Name of Facility:</b>		Central Texas Detention Facility	
<b>Physical address:</b>		218 South Laredo Street San Antonio, Texas 78207	
<b>Date report submitted:</b>		December 29, 2014 (Final Report)	
<b>Auditor Information</b>		<b>Cathy Slack</b>	
<b>Address:</b>	P.O. Box 278 Florence, CO 81226		
<b>Email:</b>	casconsulting@outlook.com		
<b>Telephone number:</b>	719-429-5158		
<b>Date of facility visit:</b>	June 3-5, 2014		
<b>Facility Information</b>			
<b>Facility mailing address:</b> <i>(if different from above)</i>			
<b>Telephone number:</b>	1-210-227-5600		
<b>The facility is:</b>	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input checked="" type="checkbox"/> <b>Private for profit</b>	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
<b>Facility Type:</b>	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> <b>Prison</b>	
<b>Name of PREA Compliance Manager:</b> Edith Doty		<b>Title:</b>	Executive Assistant
<b>Email address:</b> edoty@GEOgroup.com		<b>Telephone number:</b>	1-210-227-5600 ext. 104
<b>Agency Information</b>			
<b>Name of agency:</b>	The GEO Group Inc.		
<b>Governing authority or parent agency:</b> <i>(if applicable)</i>			
<b>Physical address:</b>			
<b>Mailing address:</b> <i>(if different from above)</i>	One Park Place, Suite 700, 621 Northwest 53 <sup>rd</sup> Street, Boca Raton, Florida 33487		
<b>Telephone number:</b>	561-999-5827		
<b>Agency Chief Executive Officer</b>			
<b>Name:</b>	George C. Zoley	<b>Title:</b>	Chairman of the Board, CEO and Founder
<b>Email address:</b>	gzoley@GEOgoup.com	<b>Telephone number:</b>	561-893-0101

<b>Agency-Wide PREA Coordinator</b>			
<b>Name:</b>	Phebia L. Moreland	<b>Title:</b>	Director, Contract Compliance, PREA Coordinator
<b>Email address:</b>	<a href="mailto:pmoreland@GEOgroup.co">pmoreland@GEOgroup.co</a>	<b>Telephone number:</b>	561-999-5827

## **AUDIT FINDINGS**

### **NARRATIVE:**

The audit of Central Texas Detention Facility was conducted on June 3-5, 2014 by Cathy Slack, Certified PREA auditor. At Approximately 8:30 a.m., an entrance meeting was held with GEO staff and Central Texas Detention Facility staff. The following were in attendance from the GEO Regional Office: Asst. Director of Operations Gary Gomez, Asst. Director of Operations Tony Carrochi, Asst. Director of Operations Gerry Maldonado and from GEO Corporate office the following were in attendance: Randy Blanton, Director Contract Compliance, Central Region and Jennifer Shaw, Manager, Contract Compliance PREA. From the Central Texas Detention Facility the following staff were in attendance: Waymon Barry, Warden, James Coapland, Assistant Warden of Operations, Angel Narvaez, Assistant Warden Finance Administration and Edith Doty PREA Compliance Manager.

The areas toured on the first day from 9:00 a.m. to 3: 30 p.m. were a total of 6 floors of housing units. The 2<sup>nd</sup>, 3,4,5,6 and 7 floors house general population inmates. The 2<sup>nd</sup>, 3<sup>rd</sup>, 5<sup>th</sup> and 7<sup>th</sup> floors also house administrative segregation. Each of the general population units has a central common area that is utilized by the inmates as dayroom space. The kitchen, laundry, intake and program areas were also toured.

Following the entrance meeting and the tour, I then began staff interviews. On Wednesday, June 4<sup>th</sup>, I continued to interview staff throughout the day until 5:00 p.m. On Thursday morning, June 5<sup>th</sup>, I toured the chapel, segregation recreation area on the roof, recreation area, Law Library and the kitchen.

The night before the audit I asked for an alpha listing of all inmates housed at the facility and randomly selected one inmate from each housing unit as well as any inmates who were limited English Speaking or disabled inmates. I asked to interview transgender and intersex inmates, but there were none at the facility. I also selected some female detainees as well. I interviewed 9 random interviews which 4 were Disabled and Limited English Proficient and 1 LGBT detainee. There were 13 random staff interviews conducted from all three shifts.

There is one allegation against a staff member for sexual abuse and is still an open case. There were a total of 21 sexual abuse/sexual harassment allegations reported within the past 12 months. Seven allegations were determined to be unfounded, 6 were unsubstantiated and 8 are ongoing investigations; none were substantiated. In 19 of those cases security staff first responders separated the victim and abuser. In the other two cases, the first responders were non-security staff members. All specialized staff were interviewed

The Exiting Briefing was held on Thursday, June 5, 2014 at approximately 4:00 p.m. with the following GEO Regional staff: Tony Carrochi, Asst. Director of Operations and GEO Corporate staff: Randy Blanton, Director, Contract Compliance, Central Region; Jennifer Shaw, Manager, Contract Compliance PREA and the staff from CTDF: Waymon Barry, Warden, James Coapland, Asst. Warden of Operations, Angel Narvaez, Assistant Warden Finance Administration and Edith Doty PREA Compliance Manager.

GEO Corporate staff on the telephone for the exit briefing were Phebia Moreland, Director, Contract Compliance PREA Coordinator, Reed Smith, Central Region Vice President and Gary Gomez, Asst. Director of Operations.

## **DESCRIPTION OF FACILITY CHARACTERISTICS:**

The Central Texas Detention Facility (CTDF), GEO is responsible for providing secure care, custody, control and transportation for 684 male and female United States Marshal Service (USMS) prisoners and US Immigration & Customs Enforcement (ICE) detainees. This 155,809 sq. ft., 8-story concrete and steel building was constructed in downtown San Antonio in early 1962, and served as Bexar County's jail until it was vacated in early 1987. The facility's interior had been allowed to deteriorate to such a degree that one of the County's original recommendations was to completely demolish the interior of the structure and rebuild it at a cost of \$10 to 12 million. GEO's study revealed that the interior could be salvaged and economically refurbished to house offenders at a cost of \$1.4 million. In January of 1989, GEO and Bexar County renovated the 28-year old, 8-story county jail. The contractual commitment involved extensive refurbishment, reequipping the facility, and training 150 local personnel. Renovation work included a remodeled kitchen and laundry, complete renovation of the air conditioning systems, implementation of hot water to laundry and housing areas, significant removal and relocation of bar grate partitions and steel bunks, modernization of administrative support areas, complete rehabilitation of surveillance and detection systems, complete overhaul of five existing elevators, a general cleanup, painting, and redecoration of the entire interior. Incorporated into the redesign were changes that allowed for the direct supervision method whereby officers move freely among the offenders, thus maintaining order and security.

The CTDF began operations in January of 1989, and was certified within five months by the Texas Commission on Jail Standards. Just seven months after opening, the medical services program was accredited by the National Commission on Correctional health Care (NCCHC). NCCHC re-accredited the facility's medical services in February 1998 and again in July 2001. GEO no longer maintains NCCHC accreditation as it is not a client requirement.

The CTDF is a high rise eight story building with no perimeter fence. A secure sally port is open to the pedestrian traffic and secured immediately prior to inmate transfers. Entry to the facility is through the sally port area and a secure elevator with cameras in the interior of the building. The facility does not have an infirmary but does have 3 male housing cells 6 female housing cells for a total of 9 medical housing cells within the medical area. The Central Texas Detention Facility has eight floors which consists of the following:

1<sup>st</sup> Floor – Medical/Intake, Classification (9 Medical Cells, 3 Holding Cells)  
2<sup>nd</sup> Floor – General Population (females) and Administrative Segregation (males), Administration, Food Service, Laundry, Attorney Visit (11 single cells, 62 general population)  
3<sup>rd</sup> Floor – General Population and Administrative Segregation, Non-Contact Visitation (11 single cells, 136 general populations)  
4<sup>th</sup> Floor – General Population, Training, Chapel, Law Library, Supply (124 general population)  
5<sup>th</sup> Floor –General Population and Administrative Segregation, Commissary (33 single cells, 54 general populations)  
6<sup>th</sup> Floor – General Population (147 general population)  
7<sup>th</sup> Floor – General Population and Administrative Segregation (33 single cells, 64 general populations)  
8th Floor-Outdoor/Indoor Recreation, Maintenance

## **SUMMARY OF AUDIT FINDINGS:**

Number of standards exceeded:  
Number of standards met: 42  
Number of standards not met: 0  
Non-applicable: 1

## §115.11 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

### **Auditor Comments, including corrective actions needed if does not meet standard.**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. Detainee Handbook revision date of May 12, 2014 addressed this standard. The orientation video for inmates has an explanation of the facility and a detailed explanation to the PREA standards. Both the video and handbook are available in English and Spanish. There are PREA posters located on each level of the facility both in English and Spanish. Standard verified by Staff Interviews with PREA Coordinator and PREA Compliance Manager.

## §115.12 - Contracting with other entities for the confinement of inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. Contracts have been updated with PREA language. This standard is verified by staff.

## §115.13 – Supervision and Monitoring

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

### **Auditor Comments, including corrective actions needed if does not meet standard**

CTDF Policy 1400.04 Prison Rape Elimination Act dated 5/12/2014 addressed this standard. CTDF Policy 900.17 Supervision and Control of Detainees dated 9/23/2013 addressed this standard. There is a letter from John M. Hurley, Senior Vice President, Operations, President, U.S. Corrections dated March 4, 2014 approving nine (9) additional staff. There were two new medical positions (1.0 Psychologist and 1.0 LPN). Additionally, the IGA increased the Intake/Utility position by 8.0 FTE and reduced the Visitation Officer position by 1.0 FTE. In total the medical staffing will increase from 15.8 FTE to 17.8 FTE and the Correctional Officer staffing will increase from 115 FTE to 122 FTE. The total authorized staffing will increase from 178.8 to 187.8. Staffing ration is 1:8 during working hours and 1:16 during sleeping hours.

Staffing posts are discussed each morning with the turn out roster. The staffing plan is reviewed annually. The PREA Coordinator is consulted regarding any assessments or adjustments to the staffing plan. There was an annual staffing assessment completed 12/31/2013 and revised 2/25/2014.

Examples of weekly signature logs of unannounced rounds were reviewed. Housing unit logs at the facility were also reviewed and it indicated staff are making routine rounds as required. CTDF uses an electronic rounds tracker device to ensure staff are conducting timely rounds.

Currently, there a Housing unit logs were also reviewed and it indicates staff are making routine rounds as required. There are no video cameras currently in the housing units. The way the housing units are designed there would be minimal areas that cameras could be placed without staff of the opposite gender viewing the inmates getting undressed. The PREA Annual Facility Assessment dated 12/31/2013 stated in Issue #5 - All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) determined the absence of video monitoring systems on the 4th and 6th floor. The proposal for cameras will be submitted during this year's budget review cycle for Fiscal Year 2015. Due to the size of the expenditure, this project is planned to be part of a "phase in" process where a number of cameras will be added over several budget cycles. The proposal does include cameras to cover all facility areas including floors 4 and 6. Staff do make consistent rounds throughout the day and logs were reviewed to ensure the staff are entering the housing units. Staff are entering at least every 15 minutes. There are 8 formal counts per day. Staff and inmate interviews confirmed that unannounced rounds are being conducted.

### §115.14 – Youthful Inmates

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

***N/A no youthful offenders.***

### §115.15 – Limits to Cross-Gender Viewing and Searches

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.04 Prison Rape Elimination Act dated 5/12/2014 addressed this standard. CTDF Policy 900.08 Searches of Detainees and Facility dated 5/15/2013 addressed this standard. There have been no transgender or intersex detainees at CTDF in the past 12 months. No cross gender searched strip searches or cavity searches have been conducted in the past 12 months or exigent circumstances have occurred to conduct cross gender strip searches. CTDF prohibits cross gender pat searches. CTDF policy 900-08 page 2 under Strip Searches states "Searches will be conducted by staff members of the same sex as the detainee being searched, affording the detainee as much privacy as possible. CTDF 900-8 page 5 states "Female detainees shall be pat searched by female officers only. Female officers shall perform visual body examinations of female detainees only. Male detainees may be pat searched by female officers. All Staff at the time of the audit have been trained in cross-gender pat down searches and searches of transgender and intersex detainees. All inmates and staff interviewed indicate the male population is able to dress, shower and toilet without female staff viewing them.

**§115.16 – Inmates with Disabilities and Inmates who are Limited English Proficient**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.04 Prison Rape Elimination Act dated 5/12/2014 addressed this standard. CTDF Policy 1600.02 Detainee Communication, Mail & Visitation addressed this standard. All detainees receive information which addresses Sexual Abuse and Sexual Harassment during orientation which is communicated orally and in writing (English and Spanish). Documentation in the files was reviewed to verify inmates are receiving information and the Detainee Handbook with information on assistance. The Central Texas Detention Facility (CTDF) has not housed a detainee in need of a staff reader due to being deaf, hard of hearing, having minimal vision, psychiatric or speech disabilities. There are telecommunication devices for the deaf at CTDF. Public Telephones have a volume control on the phones for inmates to use in case inmates have a hearing impairment. GEO has a contract with Language Line Solutions for Interpreting Services. This standard is verified by staff and inmate interviews.

## §115.17 – Hiring and Promotion Decisions

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 300.03 Selection and Retention dated 2/20/2014 addressed this standard. CTDF Policy 300.13 Background Screening dated 3/5/2013 addressed this standard. The interview with human resources and general interviews with staff support all aspects of this standard. Val Verde Correctional Facility conducts the background investigations.

## §115.18 – Upgrades to Facilities and Technology

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF has added Four Additional cameras throughout the facility. The PREA Annual Facility Assessment dated 12/31/2013 referenced concern #5 - All components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) determined the absence of video monitoring systems on the 4th and 6th floor. There is a current proposal for cameras which will be submitted during this year's budget review cycle for Fiscal Year 2015. Due to the size of the expenditure, this project is planned to be part of a "phase in" process where a number of cameras will be added over several budget cycles. The proposal does include cameras to cover all facility areas including floors 4 and 6. Verified by interviews with the Warden and Agency Head.

## §115.21 – Evidence Protocol and Forensic Medical Examinations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

## **Auditor Comments, including corrective actions needed if does not meet standard**

CTDF 1400-4 Prison Rape Elimination Act revision date of 5/12/14 addressed this standard. The Central Texas Detention Facility has not had any sexual assault allegations needing a medical exam. Should a detainee be in need of such exam it will be performed off site at Metropolitan Methodist Hospital by a Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) when available or other qualified medical practitioners.

115.21 (d) There is a Memorandum of Understanding with the Rape Crisis Center of San Antonio for one year January 2014 to December 2014.

115.21 (c) There have been no forensic medical exams, SANES/SAFEs or exams performed by qualified medical practioner conducted during the past 12 months. Should a detainee need an exam it would be performed off site at Metropolitan Methodist Hospital by a SAFE or SANE qualified medical practitioner.

115.21 (f) There is a training record for the Investigator from Bexar County who has received 20 hours of training regarding Sexual Misconduct Training for Correctional Investigators.

This standard is verified by staff and inmate interviews.

## **§115.22 – Policies to Ensure Referrals of Allegations for Investigations**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

## **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF 1400-4 Prison Rape Elimination Act revision date of 5/12/14 addressed this standard. CTDF 900-21 Crimes Committed within a Facility dated 9/23/13 addressed this standard. This policy requires the facility administrator notify the Regional Director and appropriate county and state law enforcement officials and other law enforcement agencies (i.e. U.S. Marshals Service, Immigration Custom Enforcement and Bexar County Sheriff) as soon as possible of all criminal acts that occur at CTDF. ICE officials are to be notified within two (2) hours for any such incident or alleged/suspected incident involving ICE Detainees.

There were 17 allegations of sexual abuse and sexual harassment received at CTDF. Fifteen of those allegations were investigated administratively and two were referred for criminal investigation.

115.22 (b) The agency website [www.GEOgroup.com](http://www.GEOgroup.com) ("about us section") is where referrals of allegations of sexual abuse or sexual harassment for criminal investigations is published. There is a Mutual Assistance Agreement waiting for signature at Bexar County between Bexar County Sheriff's Department and CTDF in regards to criminal investigations.

This standard is verified by staff interviews.

### §115.31 – Employee Training

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF 1400-4 Prison Rape Elimination Act revision date of 5/12/14 addressed this standard. CTDF 400-01 Employee Orientation Training dated 3/5/2013 addressed this standard. Refresher training updated as updated become available. Facility supervisors communicate refresher training at shift briefings, policy updates, audits and PREA reporting procedures. There is also annual refresher training. In interviews and discussion with staff, it was evident that staff are very knowledgeable regarding PREA and the facility procedures to respond to an alleged sexual assault. In regards to 115.31 (d) agency does document through staff signature they understand the training received. Verified by staff interviews.

### §115.32– Volunteer and Contractor Training

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF 1400-04 Prison Rape Elimination Act addressed this standard. All contractors, contract employees, volunteers and interns shall receive orientation and periodic in-service training consistent with their level of detainee contact relating to the prevention, detection and response to detainee-on-detainee sexual abuse. Verification of signed receipt of their understanding was reviewed. Based on interviews with staff and review of training records, volunteers and contract staff have been trained.

### §115.33 – Inmate Education

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.03 Detainee Grievance Procedure dated 10/02/13 addressed this standard. Inmate PREA Education is available in accessible formats for all inmates including those who are Limited English Proficient, Deaf, Visually Impaired, Disabled or limited in their reading skills. Intake Records were reviewed to ensure detainees have received information in the intake process on the agency's zero-tolerance policy. Posters were located throughout the facility in both English and Spanish regarding the agency's zero tolerance policy. Detainee Handbook in both English and Spanish addressed this standard. Interviews with staff revealed that all inmates receive the training. Interviews with detainees indicated they receive information about zero tolerance at intake and how to report incidents of sexual abuse or harassment. All detainees view a PREA video at Intake and receive a detainee handbook with a signed acknowledgement.

**§115.34 – Specialized Training: Investigations**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF 1400-04 Prison Rape Elimination Act revision date 5/12/2014 addressed this standard. The Central Texas Detention Facility refers external investigations of sexual abuse of a criminal nature to Bexar County Sheriff's Department. 115.34 (a) All CTDF investigators have been properly trained as well as the Investigator from Bexar County. 115.34 (b) Training slides regarding Garrity and Miranda requirements were reviewed.

During interviews most staff were not sure who all the investigators were but knew at least one or two of them. This was discussed with the Warden during the audit. The Warden sent an email to all staff on 6/5/2014 addressing this issue naming all the PREA investigators at CTDF. This email was also included as training reminder for each shift. This standard is verified by staff interviews.

**§115.35 – Specialized training: Medical and mental health care**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. CTDF staff do not conduct forensic exams.

115.35 (b) When these services are needed they will be conducted off site at Metropolitan Methodist Hospital in San Antonio with qualified SAFE and SANE personnel or other qualified forensic practitioners.

115.35 (c) Medical and Mental PREA training slide and records were reviewed.

This standard is verified through staff interviews.

**§115.41 – Screening for Risk of Victimization and Abusiveness**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF has not housed any transgender, intersex, or gender nonconforming detainees, nor has there been any self-identified. Screening occurs immediately upon admission. This was confirmed by documentation and staff and inmate interviews.

**§115.42 – Use of Screening Information**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1800-03 Initial Risk Assessment dated 4/30/14

addressed this standard. CTFD had not identified any Transgender or Intersex detainees and none have self-identified as Transgender or Intersex in the past 12 months.

115.42 (d) Placement and Programming assignment would be reviewed every 6 months as required.

115.42 (e) The individual's own views about their safety would be considered. The average length of stay at CTFD is 43 days. There are no program assignments; however, there are jobs for volunteer workers.

This standard was verified with staff interviews.

### **§115.43 – Protective Custody**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. Chaplains to go to the cell to see the inmates. Inmates can receive commissary, library and Legal Library services. The Legal Library is open 5 days a week and staffed by a Correctional Officer. The new outdoor caged recreation area is still under construction and the projected opening date is July 15, 2014. Segregation inmates are still afforded recreation in accordance to American Correctional Association standards.

During the past 12 months, there have been no inmates at risk for sexual victimization held in involuntary segregated housing. This was verified by staff and inmate interviews.

### **§115.51 – Inmate Reporting**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard.

115.51 (a) Inmate interviews confirmed multiple ways for inmates to report privately sexual abuse or sexual harassment, i.e., tell a staff person, the PREA hotline, contact the U.S.

Marshals, write a letter to someone on the outside, such as an attorney. tell the PREA Manager or Corporate PREA Coordinator and inform their Consular.

PREA Posters are both in English and Spanish and are posted in the living units as well as the work areas of the facility. The Detainee Handbook revised 5/12/2014 addressed this standard and has information on the Rape Crisis Center. This standard was verified by staff and inmate interviews. .

### §115.52 – Exhaustion of Administrative Remedies

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF 1400.03 Detainee Grievance Procedure and the Detainee Handbook dated 10/12/2013 addressed this standard. There have been one grievance filed on 9/20/2013 and it was answered on October 4, 2013 and was found to be unsubstantiated. The CTDF has had no emergency grievances for substantial risk of imminent sexual abuse during this reporting period. The Detainee handbook revised 5/12/2014 addressed this standard. This was verified by inmate interviews.

### §115.53 – Inmate Access to Outside Confidential Support Services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. The CTDF Detainee Handbook revised 5/12/2014 addressed this standard.

115.53 (a) The PREA Poster in English and Spanish has the Rape Crisis Center Phone Number listed which is 210-208-5779. Inmates are allowed to make phone calls but feel because the phones are in the common areas the calls are not confidential. There are several other methods of reporting.

115.53 (c) There is a Memorandum of Understanding with the Rape Crisis Center of San Antonio for one year January 2014 to December 2014.

Inmates are informed about the zero tolerance policy in Orientation classes and video, through medical and mental health providers, institutional investigators and brochures and placards placed throughout the institution. This was verified by inmate interviews.

### §115.54 – Third-Party Reporting

- Exceeds Standard (substantially exceeds requirement of standard)
- XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. The GEO posts publicly, and maintains, the third party reporting avenue on its website. The website [www.GEOgroup.com](http://www.GEOgroup.com) ("about us") section for Sexual Abuse Prevention and Reporting provides information for third party reporting. There is a DHS OIG hotline 1-800-323-8608 that can be used. There are posters in English and Spanish regarding zero tolerance. There is also the Detainee Handbook revised May 12, 2014.

### §115.61 – Staff and Agency Reporting Duties

- Exceeds Standard (substantially exceeds requirement of standard)
- XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. Verified during interviews with staff.

### §115.62 – Agency Protection Duties

- Exceeds Standard (substantially exceeds requirement of standard)
- XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTFD Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. There is one (1) incident of a female detainee that was subject to substantial risk of imminent sexual abuse by a staff member. A report was made on March 15, 2014 by a female officer that the female detainee reported an incident which occurred on December 27, 2013 on the 6<sup>th</sup> floor. An investigation began on March 15, 2014. Monitoring for retaliation began March 15, 2014. Detainee requested protection and was moved to protective custody on March 16, 2014. This standard was verified by staff interviews.

### §115.63 – Reporting to Other Confinement Facilities

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTFD Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. There were nine (9) allegations of sexual abuse at another facility being reported to them. Each inmate has assisted in identifying the name and location of the facility when reporting the alleged abuse. Immediately thereafter, the Warden, or Acting Warden notified the head administrator of that facility electronically by email. This notification is documented and maintained by the PREA Compliance Manager.

### §115.64 – Staff First Responder Duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTFD Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. Staff interviews confirmed that staff is well trained in these requirements. Each staff member has a first responder card checklist to help guide them through the first responder duties.

There were a total of 21 sexual abuse/sexual harassment allegations reported within the past 12 months. Seven allegations were determined to be unfounded, 6 were unsubstantiated and 8 are ongoing investigations; none were substantiated. In 19 of those cases security staff first

responders separated the victim and abuser. In the other two cases, the first responders were non-security staff members.

Staff interviews confirmed that staff are well trained in these requirements. This standard was verified by staff and inmate interviews.

### **§115.65 – Coordinated Response**

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. There is a PREA Response Emergency Plan and a PREA checklist for staff to use as well as First Responder PREA Cards to assist staff in regards to sexual abuse or sexual harassment.

### **115.65 Preservation of ability to protect inmates from contact with abusers**

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

#### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. There has been a collective bargaining agreement between CTDF and GEO Corrections Holdings, Inc. (GEO) and International Union Security, Police and Fire Professionals of America (SPFPA) and its Amalgamated Local 310 (SPFPA) which is dated January 28, 2014 through January 27, 2017. Edith Doty, Executive Assistant, PREA Compliance Manager at CTDF is assigned to monitoring retaliation of reporting of Sexual Abuse or Sexual Harassment. This standard was verified by the agency head.

### **§115.67 – Agency protection against retaliation**

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTFD Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. The PREA Compliance Manager, Edith Doty, is responsible for tracking against any inmate retaliation. There is a PREA tracking log to monitor retaliation. This standard was verified by staff and inmate interviews.

**§115.68 – Post-Allegation Protective Custody**

- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. The one female inmate who requested protective custody has been reviewed every 30 days. Segregation reviews were reviewed. This standard was verified by staff and inmate interviews.

**§115.71 – Criminal and Administrative Agency Investigations**

- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTFD Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. This standard was verified by Investigative Staff Interviews as well as Warden, PREA Coordinator and PREA Compliance Manager.

**§115.72 – Evidentiary Standard for Administrative Investigations**

- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. This standard was verified by staff interviews.

**§115.73 – Reporting to Inmate**

- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

CTDF Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. There were eleven (11) investigations of sexual abuse that were completed in the last 12 months. All eleven (11) inmates were notified in writing of results of investigation. There is a notification of outcome of allegation and inmate receives a copy. This standard was verified by staff and inmate interviews.

**§115.76 – Disciplinary sanctions for staff**

- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 300-10 Standards of Employee Conduct revised 5/20/2013 addressed this standard. There is a 2013 Employee Handbook that addressed this standard. There is also an acknowledgement that the Employee has read and understands the Employee handbook. There have been no terminations of any employee so far this year.

**§115.77 – Corrective action for contractors and volunteers**

- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. The 2013 Employee handbook addresses this information for contractors and volunteers. There are signed acknowledgements for Employee Handbook and PREA Training. Verified by Warden Interview.

**§115.78 – Disciplinary sanctions for inmates**

- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. There have been no incidents of inmate-on-inmate sexual abuse in the last 12 months. This standard was verified by staff interviews.

**§115.81 – Medical and mental health screenings; history of sexual abuse**

- Exceeds Standard (substantially exceeds requirement of standard)

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

- Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF has not had any allegation where the need for medical or mental health practioners would obtain an informed consent from a detainee before reporting information about prior sexual victimization that did not occur in an institutional setting. This standard was verified by staff and inmate interviews.

**§115.82 – Access to emergency medical and mental health services**

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF has qualified Medical staff on duty 24 hours a day. Detainee victims of sexual abuse will receive treatment off site and be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis. Treatment services will be provided to the victim without financial costs. This standard was verified with staff and inmate interviews.

**§115.83 – Ongoing medical and mental health care for sexual abuse victims and abusers**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. Documentation was reviewed regarding ongoing medical and mental health care. Medical PREA checklist was also reviewed. Verified with staff and inmate interviews.

**§115.86 – Sexual abuse incident reviews**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

**Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. CTDF Policy 1400.04 Prison Rape Elimination Act revised 5/12/2014 addressed this standard. There were six (6) administrative investigations of alleged sexual abuse in the last 12 months. Four (4) of the incidents have been completed with a sexual abuse incident review within 30 days. Investigation and after action reports are completed in a timely manner. This standard was verified with staff and inmate interviews.

## §115.87 – Data Collection

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. According to this policy N.1 c. Upon request, GEO shall provide such data from the previous calendar year to the Department of Justice no later than June 30. There is a monthly and annual PREA report which contains both inmate on inmate and staff on inmate sexual abuse and harassment cases. GEO also has a PREA Incident Report Survey. Data is collected internally and GEO's data is aggregated with every private facility with which it contracts for the confinement of its inmates. Reports are posted on the PREA page which can be found in "About Us" section of GEO's website.

## §115.88 – Data Review for Corrective Action

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. The standard 115.88 (c)-1 states "The agency makes its annual report readily available to the public at least annually through its website." This standard requires the agency (GEO) to publish their annual report on a public website. The annual report is posted on the PREA page which can be found in "About Us" section of the GEO's website.

## §§115.89 – Data Storage, Publication, and Destruction

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

### **Auditor Comments, including corrective actions needed if does not meet standard**

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. Standard 115.89 (b)-1 states "Agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website. This standard requires the agency (GEO) to publish their annual report on a public website.

GEO does prepare annual reports in accordance with data collection standards. Data is collected internally and GEO's data is aggregated with every private facility with which it contracts for the confinement of its inmates. Reports are posted on the PREA page which can be found in "About Us" section of GEO's website.

**AUDITOR CERTIFICATION:**

The auditor certifies that the contents of the report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.

Cathy Slack  
Cathy Slack, PREA Auditor (Signature)

December 29, 2014  
Date