

# PREA AUDIT: AUDITOR'S SUMMARY REPORT

## ADULT PRISONS & JAILS

Interim     Final Report

### Auditor Information

**Auditor name:** Katherine Brown

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**Email:** kbrown2828@yahoo.com

**Telephone number:** 727-470-4123

**Date of facility visit:** February 29 – March 1, 2016

**Date report submitted:** March 3, 2016

### Facility Information

**Name of facility:** Karnes County Correctional Center

**Physical address:** 810 Commerce St. Karnes City Texas 78118

**Facility mailing address:** N/A

**Telephone number:** 830-780-3525

<b>Karnes County Correctional Center is:</b>	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input checked="" type="checkbox"/> Private not for profit		

<b>Facility Type:</b>	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison
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<b>Name of facility's Chief Executive Officer:</b> Waymon Barry	<b>Title:</b>	Warden
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**Number of staff assigned to Karnes County Correctional Center in the last 12 months:** 104

**Designed facility capacity:** 577

**Current population of facility:** 432

**Facility security levels/detainee custody levels:** Level 1,2,& 3

**Age range of the population:** 18-71

<b>Name of PREA Compliance Manager:</b> Noelda Martinez	<b>Title:</b>	PREA Compliance Mgr.
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<b>Email address:</b> nomartinez@geogroup.com	<b>Telephone</b>	830-780-5325
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### Agency Information

**Name of agency:** The GEO Group Inc.

**Physical address:** One Park Place, Suite 700, 621 Northwest 53<sup>rd</sup> Street, Boca Raton Florida 33487

**Mailing address:** N/A

**Telephone number:** 561-893-0101

### Agency Chief Executive Officer

<b>Name:</b> George C. Zoley	<b>Title:</b>	CEO & Founder
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<b>Email address:</b> gzoley@geogroup.com	<b>Telephone number:</b>	561-893-0101
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### Agency-Wide PREA Coordinator

<b>Name:</b> Phebia L. Moreland	<b>Title:</b>	Director, Contract Compliance, PREA Coordinator
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<b>Email address:</b> pmoreland@geogroup.com	<b>Telephone #</b>	561-999-5827
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# AUDIT FINDINGS

## **NARRATIVE:**

The audit of Karnes County Correctional Center was conducted on February 29 – March 1, 2016 by Katherine Brown, Certified PREA auditor. The areas toured were a total of 41 housing units. There are 37 general population units and four administrative detention/segregation units containing a total of 41 cells, plus the kitchen, laundry and programs area.

An entrance meeting was held with facility staff. The following people were in attendance: Waymon Barry, Warden; Major Martinez; Noelda Martinez, PREA Compliance Manager and Phebia Moreland Agency Wide PREA Coordinator.

Following the entrance meeting I toured the Karnes County Correctional Center from 08:30 am-9:45 am. On the tour with me was, Waymon Barry, Warden; Major Martinez; Noelda Martinez, PREA Compliance Manager and Phebia Moreland Agency Wide PREA Coordinator.

I asked for an alpha listing of all detainees housed at Karnes County Correctional Center and randomly selected 36 detainees to interview, 15 of them were limited English speaking. There was no detainee that had hearing/vision impairment to be interviewed. Most of the inmates at this facility are limited English Speaking due to they house immigration detainees here and US Marshall. I also asked for any detainee, who was transgender/intersex, there were no transgender/intersex detainees. I also asked for a shift roster and randomly selected 13 staff to interview and I conducted 12 specialized interviews.

There were six sexual assault/harassment allegation cases, all relatively recent (within the past year) one had been unfounded; three unsubstantiated and two are still open.

## **DESCRIPTION OF FACILITY CHARACTERISTICS:**

The Karnes Correctional Center is located 59 miles southeast of San Antonio, Texas, and it is approximately 10 miles from the Otto Kaiser Memorial Hospital in Kenedy, Texas. Karnes County Correctional Center is operated by the GEO Group and utilized by the Immigration and Custom Enforcement (ICE) San Antonio Field Office, the Southern and Western Districts of the United States Marshals Service (USMS), and the Karnes County Sheriff's Department.

Karnes County Correctional Center was originally constructed in 1995. The last remodeling project was completed in 2011, which occurred in a segregation area at the request of the Texas Commission on Jail Standards. The KCCC consists of 42 single cells, and dorm areas of various sizes such as 8-bed, 19-bed, 21-bed, and 24-bed.

The medium security facility maintains contracts with at least three agencies at this time and houses each contract in separate housing units. All general population housing areas are dormitory style housing ranging from 8 to 24 beds, depending upon the size of the unit. Karnes County Correctional Center maintains the majority of the detainees in general population housing, but also has four Segregation Housing Units (SHU). All SHU detainees are single-celled.

## **SUMMARY OF AUDIT FINDINGS:**

Number of standards exceeded: 2

Number of standards met: 39

Number of standards not met:

Number of standards not applicable: 2

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

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**

Based on Corporate GEO Policy 5.1.2. A.; KCCC 11.1.4 IV.A. B. 1. Reviewed KCCC Organizational Chart and GEO Corporate Organizational chart.

GEO Group and Karnes County Correctional Center has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining their approach to preventing, detecting, and responding to such conduct.

GEO Group employs 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.

Karnes County Correctional Center employs a PREA Compliance Manager with sufficient time and authority to coordinate Karnes County Correctional Center's efforts to comply with the PREA Standards.

### **§115.12 Contracting with other agencies for confinement of detainees**

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**

Based on KCCC 11.1.4 IV. A. 5 and 5.1.2. A and review of Client Contract with US Marshal's.

All contracts include the entity's obligation to adopt and comply with the PREA standards.

Any new contract or contract renewal provides for agency contract monitoring to ensure that the contractor is complying with the PREA standards.

**§115.13 Supervision and monitoring**

- 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**

Based on policy 5.1.2. A. III.; KCCC 11.1.4 IV. C.2. Reviewed Staffing plan; annual facility assessment; Staffing roster and Daily Activity Area Inspection. Based on interview with Warden; PREA Compliance Manager and PREA Coordinator. Reviewed the staffing plan.

Karnes County Correctional Center has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect detainees against sexual abuse.

In circumstances where the staffing plan was not complied with, Karnes County Correctional Center documented and justified all deviations from the plan on the daily shift roster. Karnes County Correctional Center has had no deviations from their staffing plan during the past 12 months.

Karnes County Correctional Center completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed. Auditor reviewed the annual staffing review report.

**§115.14 Youthful detainees**

- 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)
- Not applicable Standard

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

Based on policy 5.1.2. A. III. And KCCC 11.1.4 IV.I.2. Based on interview with Warden: PREA Compliance Manager and PREA Coordinator. Reviewed: staffing plan.

No youthful inmates are housed at Karnes County Correctional Center.

**§115.15 Limits to cross gender viewing and searches**

- Exceeds Standard (substantially exceeds requirement of standard)
- X 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**

Based on policy 5.1.2. A. III. I. 1-8; KCCC 11.1.4 IV. H. Reviewed Cross Gender Training; PREA Training Objective; PREA/LMS Training Logs; Strip Search Logs; Gender Announcement Logs.

Karnes County Correctional Center has not conducted any cross gender searches.

Karnes County Correctional Center does 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 circumstance. In the event a cross gender search is done Karnes County Correctional Center will document all cross-gender strip searches and cross-gender visual body cavity searches.

Karnes County Correctional Center has policies and procedures that enable detainees to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering a detainee housing unit. Observed announcements being made as I entered the housing units and interviews confirmed practice is being done.

Karnes County Correctional Center does not search or physically examine a transgender or intersex detainee for the sole purpose of determining the detainee’s genital status. If the detainee’s genital status is unknown, it is determined during conversations with the detainee, 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.

GEO Corporation trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. GEO Corporation has developed for 2016 a very thorough cross gender pat search power point and video explaining the proper procedures and techniques to use.

**§115.16 Detainees with disabilities and limited English speaking**

- Exceeds Standard (substantially exceeds requirement of standard)
- X 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**

Based on policy 5.1.2. A. III. E. 1 (a-c); KCCC 11.1.4 VI. D.1.a-c. Reviewed Language Line Contract; Large Print for low vision; Bilingual list; Detainee Handbook English/Spanish. Based on random detainee and staff interviews and interview with limited English speaking detainees.

Karnes County Correctional Center takes appropriate steps to ensure detainees with disabilities (including, for example, detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of GEO Corporation's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. It was recommended that during the intake process for some of the immigration detainees the intake staff pays closer attention to those detainees that cannot read and write and to possibly even incorporate that question on the intake screening form. I interviewed one detainee that could not read or write and was given the PREA information in his handbook but admitted to me he could not read. I asked if he had said anything during the intake and he stated no. I asked if he signed the intake form and he acknowledge with his initials. I discovered that is a common practice for Mexicans to only use their initials so this would not cause the intake staff to think anything of it. He was aware of PREA and said the intake staff did explain the process to him and my staff interpreter explained the process again to him in my presence.

Karnes County Correctional Center does not rely on detainee interpreters, detainee readers, or other types of detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety. None have been used or required.

<b>§115.17</b>	<b>Hiring and promotion decisions</b>
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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**

Based on 5.1.2. A. III. C 2, (a-d) and H 4 (a-c) and KCCC 11.1.4 IV. C 3 and G 4. Reviewed PREA application; Background Check – Contractor/5yr background check; PREA Annual Disclosure Waiver and Promotion letter/PREA promotion disclosure Waiver. Based on interview with Human Resource Director, review of personnel files; and Hiring packet with PREA questions. Review of personnel files and checks of criminal records being performed and annual background checks being redone. Reviewed candidate resume questionnaire; background release form; Disclosure & Consent. Reviewed Annual performance evaluation authorization form.

GEO Corporation does not hire or promote anyone who may have contact with detainees, and does not enlist the services of any contractor who may have contact with detainees, who has engaged in sexual abuse in any criminal justice facility, 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 has been civilly or administratively adjudicated to have engaged in the activity described above.

GEO Corporation considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with detainees.

GEO Corporation performs a criminal background records check before enlisting the services of any contractor who may have contact with detainees and performs a records check annually on all current employees and contractors who may have contact with detainees. Reviewed annual background check.

Based on all staff and contractors receive and annual background check I find Karnes County exceeds in this standard.

#### **§115.18 Upgrades to facilities and technology**

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**

Based on 5.1.2. A. III. C – 3 and KCCC 11.1.4 IV. C 4. Reviewed KCCC facility diagram; purchase order for surveillance system. Based on interview of agency head and warden.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, GEO Corporation considers how such technology may enhance GEO Corporation's ability to protect detainees from sexual abuse. There have been no substantial or modifications to Karnes County Correctional Center, 9 cameras were added as a result of a PREA assessment.

#### **§115.21 Evidence protocol and forensic medical exams**

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**

Based on policy 5.1.2. E. III. A 3 (b-d) Based on interview with SANE/SAFE staff and PREA compliance manager.

To the extent Karnes County Correctional Center is responsible for investigating allegations of sexual abuse; GEO Corporation follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

Karnes County Correctional Center offers all victims of sexual abuse access to forensic medical examinations, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Nurse Examiners (SANEs). Karnes County Correctional Center is currently working on an MOU with Methodist Specialty Hospital for SANE exams. However, there is an email from the hospital stating that they would treat any detainee that was brought in and provide all the SANE services regardless of a signed MOU.

Karnes County Correctional Center makes available to the victim a victim advocate from Guadalupe Valley Family Violence Shelter.

As requested by the victim, a victim advocate from Guadalupe Valley Family Violence Shelter or Methodist Specialty Hospital accompanies and supports the victim through the forensic medical examination process and investigatory interviews and are provide emotional support, crisis intervention, information, and referrals.

<b>§115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
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- 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**

Based on policy 5.1.2. E. III. A-1 a. 5.1.2. A. III. A-2. and KCCC 11.1.4 IV. A.2. Reviewed mutual aid agreement with Karnes County Sheriff's Office; KCCC Monthly PREA Tracking log; referral to law enforcement. Based on interview with agency head and investigative staff.

Karnes County Correctional Center ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Karnes County Correctional Center has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to the Karnes County Sheriff's Office who has the legal authority to conduct criminal investigations. GEO Corporation publishes such policy on its website. GEO Corporation documents all such referrals.

Karnes County Correctional Center is responsible for conducting criminal investigations; such publication describes the responsibilities of both GEO Corporation and the investigating entity.

<b>§115.31</b>	<b>Employee training</b>
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- 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**

Based on policy 5.1.2. A. III. F. 1. (a-f) and KCCC 11.1.4 IV. E.1. Reviewed PREA training curricula; PREA training records and PREA acknowledgement forms. Based on interview with random staff and review of lesson plan PREA Orientation; Training sign in sheet.

The GEO Group trains all employees who have contact with detainees 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) Detainees' right to be free from sexual abuse and sexual harassment;
- (4) The right of detainees 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 detainees;
- (9) How to communicate effectively and professionally with detainees, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming detainees; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The training is tailored to the gender of the detainees at Karnes County Correctional Center. The employees receive additional training if the employee is reassigned from a facility that houses only male detainees to a facility that houses only female detainees, or vice versa.

Karnes County Correctional Center documents, through employee signature verification, those employees understand the training they have received.

<b>§115.32</b>	<b>Volunteer and contractors training</b>
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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**

Based on policy 5.1.2. A. III. G. 1 (a-e) & H. 1 (a-f) and KCCC 11.1.4 IV. F.1; G.1. Reviewed list of volunteers; list of contractors; GEO PREA training acknowledgement and contract training completion status detail Lesson Plan; Volunteer roster; training acknowledgement. Based on interview with volunteer and contractors.

Karnes County Correctional Center ensures all volunteers and contractors who have contact with detainees have been trained on their responsibilities under GEO Corporation's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with detainees, but all volunteers and contractors

who have contact with detainees are notified of GEO Corporation's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Karnes County Correctional Center has signed training acknowledgements forms confirming that volunteers and contractors understand the training they have received.

<b>§115.33</b>	<b>Detainee education</b>
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- 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**

Based on policy 5.1.2. A. III. E. 2 (a-j) and KCCC 11.1.4 IV. D.2. Reviewed Zero tolerance poster; facility PREA poster; Detainee handbook; video orientation/handbook/PREA receipt and PREA detainee lesson plan. Based on interview with random detainees and intake staff.

During the intake process, detainees receive information explaining GEO Corporation's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. PREA information is available on Channel 4 on the TV's in all housing units, however the detainees have access to turn the channel and do not leave it on the Channel to view.

Karnes County Correctional Center provides a comprehensive education to detainees through verbally explaining PREA to them and provides them with a handout regarding their right 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. This is performed the same day they arrive.

GEO Corporation provides detainee education in formats accessible to all detainees, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to detainees who have limited reading skills. There is documentation of detainee participation in these education sessions. In interviewing the limited English and non-English detainees it was discovered that their levels of education were not the same as English Speaking detainees. More attention needs to be paid to the detainees from the other countries outside of Mexico as well as those detainees that cannot read and write. While they were all aware of how to report a PREA incident and what PREA was their level of understanding was not the same as the English speaking detainees.

<b>§115.34</b>	<b>Specialized training: Investigators</b>
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- 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**

Based on policy 5.1.2. A. III F. 3 a-c and KCCC 11.1.4 IV. D.3. Reviewed PREA Specialized Training Curricula; list of facility Investigators; completed PREA training LMS; GEO Certificate of Completion – Investigating Sexual Abuse in a Confinement Setting. Based on interview with investigative staff.

In addition to the general training provided to all employees Karnes County Correctional Center ensures that the in house investigators have received training in conducting investigations in confinement settings.

Specialized training includes 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. Karnes County Correctional Center maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

If the case goes criminal Karnes County Correctional Center contacts Karnes County Sheriff’s Office to have an investigator conduct the investigations. The Sheriff’s Office investigators have all received PREA training.

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

- 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**

Based on policy 5.1.2. A. III. F. 2 (a-d) and KCCC 11.1.4 IV. E.2. Reviewed Specialized Training Medical/Mental Health lesson plan; Medical and Mental Health Employee Roster; Medical and Mental Health Training Records; Medical on Call Roster; PREA Training Acknowledgement; PREA Specialized Medical/Mental Health Training Acknowledgement.

Karnes County Correctional Center ensures 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; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

Karnes County Correctional Center has a psychologist three days a week and a psychiatrist that is available through tele-med.

GEO Corporation maintains documentation that medical and mental health practitioners have received the training.

Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers.

**§115.41 Screening for risk of victimization and abusiveness**

X 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**

Based on 5.1.2. A. III. D-1 (a-g) and KCCC 11.1.4 IV. C.1. Reviewed PREA Risk Assessment and 30 day Re-assessment questionnaire. Based on interview with random detainees and intake staff responsible for screening.

All detainees are assessed during an intake screening and upon transfer to another facility for risk of being sexually abused by other detainees or sexually abusive toward other detainees.

Intake screenings take place the same day of arrival at Karnes County Correctional Center.

Karnes County Correctional Center uses an objective screening instrument.

The intake screening considers, at a minimum, the following criteria to assess detainees for risk of sexual victimization:

- (1) Whether the detainee has a mental, physical, or developmental disability;
- (2) The age of the detainee;
- (3) The physical build of the detainee;
- (4) Whether the detainee has previously been incarcerated;
- (5) Whether the detainee's criminal history is exclusively nonviolent;
- (6) Whether the detainee has prior convictions for sex offenses against an adult or child;
- (7) Whether the detainee is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- (8) Whether the detainee has previously experienced sexual victimization;
- (9) The detainee's own perception of vulnerability; and
- (10) Whether the detainee is detained solely for civil immigration purposes.

The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to GEO Corporation, in assessing detainees for risk of being sexually abusive.

Within 30 days from the detainee's arrival at Karnes County Correctional Center, Karnes County Correctional Center reassesses the detainee's risk of victimization or abusiveness based upon any additional, relevant information received by Karnes County Correctional Center since the intake screening. Only county inmates stay for any length of time, most detainees leave within approximately 11 days.

A detainee's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the detainee's risk of sexual victimization or abusiveness.

Detainees are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked.

GEO Corporation implements appropriate controls on the dissemination within Karnes County Correctional Center of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the detainee's detriment by staff or other detainees. Only limited staff has access to the risk screening form: counselors; PREA Manager; Major and Lieutenants. All Risk Assessments are maintained in detainee files and are kept locked.

Based on the detainees being screened immediately upon arrival I find they exceed in this standard.

<b>§115.42</b>	<b>Use of screening information</b>
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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**

Based on policy 5.1.2. A. III. D. 1 (c-d) 3 (a-c) and KCCC 11.1.4 IV. C. 3. Reviewed KCCC Monitored List/Risk Assessment; Transgender Risk Assessment and PREA Vulnerability Reassessment Questionnaire. Based on interview with PREA compliance manager and staff responsible for risk screening.

Karnes County Correctional Center uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those detainees at high risk of being sexually victimized from those at high risk of being sexually abusive.

Karnes County Correctional Center makes individualized determinations about how to ensure the safety of each detainee.

In deciding whether to assign a transgender or intersex detainee to a facility for male or female detainees, and in making other housing and programming assignments, GEO Corporation considers on a case-by-case basis whether a placement would ensure the detainee's health and safety, and whether the placement would present management or security problems.

Placement and programming assignments for each transgender or intersex detainee is reassessed at least twice each year to review any threats to safety experienced by the detainee.

A transgender or intersex detainee's own views with respect to his or her own safety are be given serious consideration.

Transgender and intersex detainees are given the opportunity to shower separately from other detainees.

Karnes County Correctional Center does not place lesbian, gay, bisexual, transgender, or intersex detainees in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such 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 such detainees.

**§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**

Based on policy 5.1.2. A. III. J. 1 (a-f) and KCCC 11.1.4 IV. I. 1. Based on interview with warden.

No detainees have been placed in involuntary segregation housing.

Detainees at high risk for sexual victimization are not placed 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.

Detainees placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If Karnes County Correctional Center restricts access to programs, privileges, education, or work opportunities, Karnes County Correctional Center documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations. Karnes County Correctional Center has not placed any detainee in involuntary segregation for high risk of sexual victimization within the last 12 months.

Karnes County Correctional Center assigns such detainees to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment are not ordinarily exceed a period of 30 days. If involuntary segregated housing assignment is made Karnes County Correctional Center clearly documents the basis for Karnes County Correctional Center concern for the detainee's safety; and the reason why no alternative means of separation can be arranged. Every 30 days a review is performed to determine whether there is a continuing need for separation from the general population. The majority of the detainees at Karnes County Correctional Center are only here for 11.7 days on average, therefore there were no 30 day reviews for me to check.

**§115.51 Detainee 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**

Based on 5.1.2. A. III K. 1 (a-c) and KCCC 11.1.4 IV. J. 1. Reviewed Mutual aid agreement with Karnes County Sheriff's Office; Detainee Handbook; Speed dial numbers. Based on interviews with random staff and detainees.

Karnes County Correctional Center provides multiple internal ways for detainees to privately report sexual abuse and sexual harassment, retaliation by other detainees or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. The PREA hotline number #99 alerts the Warden.

Karnes County Correctional Center provides at least one way for detainees to report abuse or harassment to a public or private entity or office that is not part of GEO Corporation, and that is able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials, allowing the detainee to remain anonymous upon request. Detainees can contact Guadalupe Valley Family Violence Shelter. In the handbook are all the telephone numbers and addresses.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports.

The GEO Group provides a method for staff to privately report sexual abuse and sexual harassment of detainees. Employees can go to the GEO website for ways to report.

<b>§115.52</b>	<b>exhaustion of administrative remedies</b>
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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**

Based on policy 5.1.2. A. III. K. 2 (a-d); KCCC 11.1.4 IV. J. 2. and detainee handbook.

No detainee has filed a PREA related grievance.

Karnes County Correctional Center does not impose a time limit on when a detainee may submit a grievance regarding an allegation of sexual abuse.

Karnes County Correctional Center has not received any detainee grievances regarding a PREA related incident.

Karnes County Correctional Center does not require a detainee to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

Karnes County Correctional Center ensures that a detainee who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint.

Karnes County Correctional Center issues 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.

Third parties, including fellow detainees, staff members, family members, attorneys, and outside advocates, are permitted to assist detainees in filing requests for administrative remedies relating to allegations of sexual abuse, and are also be permitted to file such requests on behalf of detainees.

Karnes County Correctional Center has established procedures for the filing of an emergency grievance when the detainee is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, Karnes County Correctional Center immediately forwards 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 is taken, and provides an initial response within 48 hours, and issues a final agency decision within 5 calendar days. The initial response and final agency decision documents Karnes County Correctional Center' determination whether the detainee is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Karnes County Correctional Center may discipline a detainee for filing a grievance related to alleged sexual abuse only where Karnes County Correctional Center demonstrates that the detainee filed the grievance in bad faith.

<b>§115.53</b>	<b>Detainee access to outside confidential support services</b>
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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**

Based on policy 5.1.2. A. III. L -8 (a-b); KCCC 11.1.4 IV. K. 8. Reviewed Detainee Handbook; Detainee outside Support Services; MOU with Guadalupe Valley Family Violence Shelter and KCCC speed dial numbers, #88 goes to Rape Crisis Center and #99 goes to Karnes Warden. Based on interview with random detainees.

Karnes County Correctional Center provides detainees with access to outside victim advocates from Guadalupe Valley Family Violence Shelter for emotional support services related to sexual abuse by giving detainees 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. Karnes County Correctional Center enables reasonable communication between detainees and these organizations and agencies, in as confidential a manner as possible.

Karnes County Correctional Center informs detainees, 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.

Karnes County Correctional Center maintains a memoranda of understanding with Guadalupe Valley Family Violence Shelter.

**§115.54 Third party reporting**

Exceeds Standard (substantially exceeds requirement of standard)

X 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**

Based on policy 5.1.2. A. III K-3 and KCCC 11.1.4 IV. J. 3.

The GEO Group has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of a detainee. Third party reports can be done on the website [www.geogroup.com/reporting/prea](http://www.geogroup.com/reporting/prea).

**§115.61 Staff and agency reporting duties**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on policy 5.1.2. A. III. K. 4 (a-c); KCCC 11.1.4 IV. F.2; G.2 and J. 4. Based on interviews with random staff; warden and medical staff.

The GEO Group requires 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 GEO Group; retaliation against detainees or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Apart from reporting to designated supervisors or officials, staff does not reveal 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.

If the alleged victim is considered a vulnerable adult under Texas Mandatory Report V.T.C.A Penal code 22.04 vulnerable person's statute, GEO Corporation reports the allegation to the designated State or local services agency under applicable mandatory reporting laws. There have been no incidents in past 12 months involving a vulnerable adult.

Karnes County Correctional Center reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Karnes County Sheriff's Office.

**§115.62 Agency protection duties**

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**

Based on 5.1.2. A. III. L. 1 and KCCC 11.1.4 IV. K. 1. Based on interviews with random staff, and warden as well as reviewed incident reports.

When the GEO Group learns that a detainee is subject to substantial risk of imminent sexual abuse it takes immediate action to protect the detainee.

§115.63	<b>Reporting to other confinement facilities</b>
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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**

Based on 5.1.2. A. III. L 5 (a-c). and KCCC 11.1.4 IV. K. 5. Reviewed notification letter sent to another facility. Based on interview with agency head and warden.

Upon receiving an allegation that a detainee was sexually abused while confined at another facility, the head of Karnes County Correctional Center that received the allegation notifies the head of Karnes County Correctional Center where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented.

§115.64	<b>Staff first responder duties</b>
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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**

Based on 5.1.2. A. III L-2 (a-f); 5.1.2. E. III D 1-4 and KCCC 11.1.4 IV. K. 2. Based on interview with security staff who is first responders.

Upon learning of an allegation that a detainee was sexually abused, the first security staff member to respond separates the alleged victim and abuser; preserves and protects any crime scene until appropriate steps can be taken to collect any evidence; and if the abuse occurred within a time 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 if the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Staff is issued a first responder card that they are required to carry detailing the duties of the first responders.

If the first staff responder is not a security staff member, the responder request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

**§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**

Based on 5.1.2. A. III A-4, L3; KCCC 11.1.4 IV. A. 4 and Coordinated Response Plan. Based on interview with warden.

Karnes County Correctional Center has 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.

**§115.66 Preservation of ability to protect detainees 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)

Not Applicable Standard

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

Based on 5.1.2. A. III. A. 3 (b); 5.1.2. E. III. A 2 (a) Based on interview with agency head. GEO Corporation does not participate in collective bargaining.

**§115.67 Agency protection against retaliation**

Exceeds Standard (substantially exceeds requirement of standard)

X 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**

Based on 5.1.2. A. III. M 2 (a-f) and KCCC 11.1.4 IV. L.2. Reviewed Monthly PREA Incident Tracking/Protection from Retaliation Log. Based on interview with agency head, warden, and designated staff member responsible for monitoring retaliation.

The GEO Group has a policy to protect all detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff, and are designate which staff members or departments are charged with monitoring retaliation.

The GEO Group has multiple protection measures, such as housing changes or transfers for detainee victims or abusers, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for detainees or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, Karnes County Correctional Center monitors the conduct and treatment of detainees or staff who reported the sexual abuse and of detainees who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by detainees or staff, and are act promptly to remedy any such retaliation. There is periodic status checks performed. Items GEO Corporation should monitor include any detainee disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Karnes County Correctional Center continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. The average length of stay for a detainee is 11.7 days accepts for the county inmates, therefore Karnes will probably never have a 90 day follow-up unless it involves a county inmates.

If any other individual who cooperates with an investigation expresses a fear of retaliation, GEO Corporation takes appropriate measures to protect that individual against retaliation.

§115.68

**Post allegation protective custody**

Exceeds Standard (substantially exceeds requirement of standard)

X 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**

Based on policy 5.1.2. A. III L 6 and KCCC 11.1.4 IV. K.6 Based on interview with warden.

No detainee has been placed in involuntary segregation.

Any use of segregated housing to protect a detainee who is alleged to have suffered sexual abuse receives all the same rights and privileges as general population detainees.

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**

Based on 5.1.2. E III. B. 1 and KCCC 11.1.4 IV. N. 1. Reviewed PREA Monthly Log and Referral of Staff Misconduct Investigation. Based on interview with investigative staff.

When Karnes County Correctional Center conducts its own investigations into allegations of sexual abuse and sexual harassment, it does so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

Where sexual abuse is alleged, Karnes County Correctional Center uses investigators who have received special training in sexual abuse investigations.

Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.

When the quality of evidence appears to support criminal prosecution, Karnes County Correctional Center refers the case to Karnes County Sheriff's Office.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as detainee or staff. No agency requires a detainee 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.

Administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that contain a thorough description of physical, testimonial, and documentary evidence, the reasoning behind credibility assessments, and investigative facts and findings, and attaches copies of all documentary evidence where feasible.

Substantiated allegations of conduct that appears to be criminal are referred to Karnes County Sheriff Office for prosecution.

GEO Corporation retains all written reports for as long as the alleged abuser is incarcerated or employed by GEO Corporation, plus five years.

The departure of the alleged abuser or victim from the employment or control of Karnes County Correctional Center or agency does not provide a basis for terminating an investigation.

Exceeds Standard (substantially exceeds requirement of standard)

X 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**

Based on policy 5.1.2. E. III B 2 (d) and KCCC 11.1.4 IV. N. 2. Reviewed Administrative Report. Based on interview with investigative staff.

GEO Corporation imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

§115.73	<b>Reporting to detainees</b>
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Exceeds Standard (substantially exceeds requirement of standard)

X 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**

Based on policy 5.1.2.E III F (a-c) and KCCC 11.1.4 IV. L. 4. Reviewed Notification of Outcome form. Based on interview with warden and investigative staff.

Following an investigation into a detainee’s allegation that they suffered sexual abuse in an agency facility, GEO Corporation informs the detainee as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If GEO Corporation did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the detainee.

Following an detainee’s allegation that a staff member has committed sexual abuse against the detainee, GEO Corporation subsequently informs the detainee (unless GEO Corporation has determined that the allegation is unfounded) whenever the staff member is no longer posted within the detainee’s unit; the staff member is no longer employed at Karnes County Correctional Center; GEO Corporation learns that the staff member has been indicted on a charge related to sexual abuse within Karnes County Correctional Center; or GEO Corporation learns that the staff member has been convicted on a charge related to sexual abuse within Karnes County Correctional Center.

Following an detainee’s allegation that they had been sexually abused by another detainee, GEO Corporation subsequently informs the alleged victim whenever GEO Corporation learns that the alleged abuser has been indicted on a charge related to sexual abuse within Karnes County Correctional Center; or GEO Corporation learns that the alleged abuser has been convicted on a charge related to sexual abuse within Karnes County Correctional Center.

All such notifications or attempted notifications are documented.

Karnes County Correctional Center obligation to report under this standard is terminated if the detainee is released from GEO Corporation’s custody.

Exceeds Standard (substantially exceeds requirement of standard)

X 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**

Based on policy 5.1.2. E. III 3 G 1.(a,c,d) and KCCC 11.1.4 IV. M. 1. Employee Handbook pg. 16. Reviewed Administrative Suspension Letter.

Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who has engaged in sexual abuse. There have been no substantiated instances of facility staff involved in sexual abuse.

Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are 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.

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, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

Exceeds Standard (substantially exceeds requirement of standard)

X 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**

Based on policy 5.1.2. A. III G 3 (a); 5.1.2. E. III G 3 (a-f) and KCCC 11.1.4 F.3 & G.3. Based on interview with warden.

There have been no corrective actions involving volunteer/contractors.

Any contractor or volunteer who engages in sexual abuse is prohibited from contact with detainees and is reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

Karnes County Correctional Center takes appropriate remedial measures, and considers whether to prohibit further contact with detainees, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

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**

Based on 5.1.2. E. III G 2 (a-f) and KCCC 11.1.4 IV. M.2. and Detainee Handbook. Based on interview with medical staff.

Karnes County Correctional Center has had no substantiated claims of detainee on detainee sexual abuse.

Detainees are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the detainee engaged in detainee-on-detainee sexual abuse or following a criminal finding of guilt for detainee-on-detainee sexual abuse.

Sanctions are commensurate with the nature and circumstances of the abuse committed, the detainee's disciplinary history, and the sanctions imposed for comparable offenses by other detainees with similar histories. Karnes County Correctional Center has had no disciplinary sanctions for detainees filing false claims.

The disciplinary process considers whether a detainee's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

Karnes County Correctional Center has a psychologist that is at Karnes County Correctional Center three times a week who can offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse.

GEO Corporation disciplines a detainee for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

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

The GEO Group prohibits all sexual activity between detainees and may discipline detainees for such activity.

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**

Based on policy 5.1.2. A. III D 2 (a-d) and KCCC 11.1.4 IV. C. 2. Based on interview with staff responsible for risk screening and medical staff. Reviewed Sexual Risk Indicator Screening.

Based on interview with staff responsible for risk screening and medical staff.

If the screening indicates that a detainee has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the detainee is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. Counselors notify medical as soon as they have screened a detainee who was a prior victim of sexual assault and medical will schedule them for an appointment with the psychologist.

If the screening indicates that a detainee has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the detainee is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.

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 obtain informed consent from detainees before reporting information about prior sexual victimization that did not occur in an institutional setting.

§115.82	<b>Access to emergency medical and mental health services</b>
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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**

Based on 5.1.2. A. III L 7 (a-b) and KCCC 11.1.4 IV. K.7. Based on interview with medical staff.

No detainee has required emergency Medical or Mental Health care.

Detainee 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.

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 take preliminary steps to protect the victim and

immediately notify the appropriate medical and mental health practitioners. There have been no incidents in the past 12 months requiring emergency medical care.

Detainee victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Treatment services are 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.

§115.83

**Ongoing medical and mental health care for sexual abuse victims**

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**

Based on 5.1.2 A. III. M. 1 and KCCC 11.1.4 IV. L. 1. Based on interview with medical staff.

No detainee has been a victim of sexual abuse.

Karnes County Correctional Center offers medical and mental health evaluation and, as appropriate, treatment to all detainees who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

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.

Karnes County Correctional Center provides such victims with medical and mental health services consistent with the community level of care.

Detainee victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Treatment services are 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.

§115.86

**Sexual abuse incident reviews**

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**

Based on policy 5.1.2. A. III. M. 3 (a-c) and KCCC 11.1.4 IV. K.3. Reviewed PREA Investigation and After Action Review. Based on interview with warden, PREA compliance manager; incident review team and reviewed After Action Report.

Karnes County Correctional Center conducts 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. This review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; 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 Karnes County Correctional Center; and they examine the area in Karnes County Correctional Center where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

§115.87

#### **Data collection**

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**

Based on 5.1.2. A. III N. 1 and KCCC 11.1.4 O. 1. Reviewed Monthly PREA Incident tracking log and Annual PREA Report.

GEO Corporation collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, and aggregates the incident-based sexual abuse data at least annually.

The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

GEO Corporation maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

GEO Corporation obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its detainees.

Upon request, GEO Corporation provides all such data from the previous calendar year to the Department of Justice no later than June 30.

- 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**

Based on policy 5.1.2. A. III. N 2.(a-d) KCCC 11.1.4 IV. O. 2 and GEO Annual Report. Based on interview with PREA coordinator.

The GEO Group reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as GEO Corporation as a whole.

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

The GEO Groups' report is approved by GEO Corporation head and made readily available to the public through its website [www.geogroup.com/reporting/prea](http://www.geogroup.com/reporting/prea).

- 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**

Based on policy 5.1.2. A. III N. 3; KCCC 11.1.4 IV. O. 3; GEO Annual Data Report and Texas State Records Retention Schedule.

The GEO Group makes 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 [www.geogroup.com/reporting/prea](http://www.geogroup.com/reporting/prea).

All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires.

**AUDITOR CERTIFICATION:**

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

*Katherine Brown*

March 3, 2016

Auditor Signature

Date