

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of facility:		Moshannon Valley Correctional Facility	
Physical address:		555 GEO Drive, Phillipsburg, PA 16866	
Date report submitted:		December 29, 2014	
Auditor Information		Cathy Slack	
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Email:		casconsulting@outlook.com	
Telephone number:		719-429-5158	
Date of facility visit:		August 4-6, 2014	
Facility Information			
Facility mailing address: <i>(if different from above)</i>			
Telephone number:		814-768-1200	
The facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input checked="" type="checkbox"/> Federal
	<input checked="" type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
Name of PREA Compliance Manager:		Sean Bresnahan	Title: Psychologist, PREA Compliance Manager
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Agency Information			
Name of agency:		The GEO Group, Inc.	
Governing authority or parent agency: <i>(if applicable)</i>			
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Mailing address: <i>(if different from above)</i>			
Telephone number:		561-999-5827	
Agency Chief Executive Officer			
Name:	George C. Zoley	Title:	Chairman of the Board, CEO and Founder
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AUDIT FINDINGS

NARRATIVE:

Due to travel difficulties, the entrance began on Monday, August 4, 2014 at 4:45 p.m. The following staff were present at the Entrance Briefing, George Wigen, Warden; William Newell, Deputy Warden; Charis Hahn, Assistant Warden, Finance and Administration; David Minarchick, Compliance Administrator; Eric Gates, Acting Major and Sean Bresnahan, PREA Compliance Manager. Jennifer Shaw, Contract Compliance Manager, PREA was in attendance from the Geo Corporate Office.

The tour of Moshannon Valley Correctional Facility (MVCC) began at 5:00 p.m. until 8:00 p.m. There were three (3) random Staff interviews on afternoon shift and three random interviews on 3rd shift conducted from 8:00 p.m. to 10:30 p.m. On the second day of the audit, eleven (11) inmate interviews were conducted as follows:

- 3 from Unit A
- 2 from Unit B
- 2 from Unit C
- 2 from Unit D
- 1 from SHU
- 1 identified as LGBTI

Four (4) of these inmates were Limited English Proficient and needed translation through a staff interpreter.

There were six (6) allegations of sexual abuse. Five (5) allegations were administrative and one (1) allegation was considered criminal. The criminal allegation is currently being investigated by the Commonwealth of Pennsylvania State Patrol. Four (4) administrative allegations were unfounded and one (1) administrative allegation was unsubstantiated.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The GEO Group, Inc. Moshannon Valley Correctional Center (MVCC) is located in the small town of Philipsburg, Pennsylvania on the eastern edge of Clearfield County. It is in Decatur Township and is approximately 30 miles west of State College and 10 miles south of Interstate 80. The population of Decatur Township is approximately 3,000, and the town of Philipsburg is approximately 2,800.

Construction of the 1,495 bed facility began in November 2004; MVCC began receiving federal inmates in April 2006. In May 2012, a contract modification was issued directing an increase of the inmate population to 1,820. In September 2012, construction began to remodel the existing housing units to hold additional inmates. In addition, a new 54 bed special housing unit was built and the medical unit and inmate dining room were modified. Construction was completed in April 2013.

The site consists of 196.35 acres of which 31.13 are behind the wire, and approximately 243,111 gross square feet of building areas. The facility is contracted by the Federal Bureau of Prisons to house up to 1820 low security federal sentenced adult male criminal aliens and parole violators from the District of Columbia. The majority of inmates are Spanish speaking.

The Mission Statement of the Moshannon Valley Correctional Center states the following: 1) maintain a safe and secure environment for both the incarcerated offender and the staff responsible for them; 2) provide an environment making available and encouraging inmate participation in all aspects of programming; 3) provide programs and activities that are conducive to the beneficial re-entry into the community by incarcerated persons as prescribed by the sentencing jurisdiction and contract in authority; and 5) provide GEO with sufficient revenue sources to, at a minimum, offset the cost of operations.

Facility staff is responsible for maintaining 13 buildings at MVCC. The design of the facility is a campus style arrangement in which the facility's support and housing buildings are within a secure compound. There are four general population housing unit buildings (A, B, C and D), one housing control center in each unit, six pods within each of the four housing units; four pods house 78 inmates in each (312) and two pods house 72 inmates in each (144), for a total of 456 inmates per housing unit (1824 bed capacity). The dayrooms are immediately adjacent to living areas and include steel tables/seats microwave ovens, and four televisions. The Special Housing Unit (SHU) building Z houses up to 184 administrative, disciplinary, or protective custody segregation inmates and is divided into three wings separated by the SHU control center; there are 91 double bunk cells and two handicap single bunk cells. All of the doors within this unit are detention grade and are controlled by the control center officer. Segregation cells include a toilet and washbasin. A pipe round system is utilized to track the require staff rounds.

In addition to the housing units inside the compound, there are areas for recreation, vocational tech building for education, religious services, and library; and a support building for programs, kitchen and dining room, laundry, commissary, security offices, receiving and discharge, property and medical infirmary. Outside the perimeter fence, there is an administration building/armory, training center, warehouse/maintenance building, and pump house.

Exit Briefing was held on Wednesday, August 6, 2014 at 2:00 p.m. with the following GEO staff: George Wigen, Warden, William Newell, Deputy Warden, Charis Hahn, Assistant Warden, Finance and Administration, David Minarchick, Compliance Administrator, Eric Gates, Acting Major, Sean Bresnahan, PREA Compliance Manager, Justin Beldo, Health Services Administrator, Jeanne Keel, Health Services Director, Eastern Region, Terry Oaks, Health Services Manager, Eastern Region, Paul Juster, Senior Secure Institutional Manager, BOP and Jennifer Shaw, Contract Compliance Manager, PREA from the GEO corporate office. On the telephone from the GEO Eastern Region office was Kenny Cauley, Director of Operations, Eastern Region and Jeff Thomas, Assistant Director of Operations, Eastern Region. On the telephone from the GEO Corporate Office was Phebia Moreland, Director Contract Compliance, PREA Coordinator.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded:	4
Number of standards met:	38
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)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/13 addressed this standard. GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

There are two organizational charts, a GEO Corporate Organizational Chart and a MVCC Organizational Chart and both indicated the dual supervision of the Moshannon Valley Correctional Center (MVCC) PREA Compliance Manager with the Health Services Administrator at MVCC and the Agency PREA Coordinator.

MVCC has not received any transgender or intersex inmates or has one self-identified. There is a BOP Transgender transmittal letter sent by Paul Juster, Oversight BOP dated May 16, 2014 reaffirms that contract modification #121 Program Statement 6031.01 remains in effect. This program statement has been revised and is now identified as program Statement 6031.03, but under the terms of this contract, PS 6031.01 is to be followed, which states, "Transgender inmates are not assigned to lower security facilities." FStandard verified by staff interviews.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

FBOP contract revised 1/12/13 added PREA language. MVCC is monitored annually by the BOP per contract. In the past 12 months there have been no deficiencies noted related to PREA products.

§115.13 – Supervision and Monitoring

XX 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 0.13.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The **GEO Facility Annual Assessment** dated 10/3/2013 states the following:

- 1) The facility operates within general correctional practices;
- 2) There have been no judicial findings of inadequacy;
- 3) There have not been any findings of inadequacy from Federal Investigative Agencies;
- 4) There have not been any findings of inadequacy from external oversight bodies (i.e. BOP);
- 5) There are areas within the institution where "blind spots" or areas of isolation exist;
- 6) The inmate population consists of men, low security, and deportable by INS;
- 7) The facility has a sufficient number of supervisory staff on all shifts;
- 8) The majority of institutional programs occur between 0800-1600 shift;
- 9) The facility adheres to all applicable regulations and standards;
- 10) There has been one unsubstantiated incident of sexual abuse during the assessment period;
- 11) NA

The **GEO Facility Annual Assessment** dated 10/3/2013 indicated there were no issues with the staffing plan. MVCC approved staffing plan dated 10/15/2013. All issues related to blind spots have been addressed by adding mirrors and adjusted security procedures.

The Weekly Duty Officer Report regarding PREA issues was reviewed. Staff have PREA Unannounced rounds questions such as:

1. Ask two random inmates (per unit) if they are aware of MVCC's Zero tolerance toward sexual assault.
2. Ask two random inmates (per unit) if they are aware of how to report PREA related incidents and the ability to report anonymously.
3. Ask one staff member (per unit) if they are aware of MVCC's Zero tolerance toward sexual assault, misconduct and sexual harassment.
4. Ask one staff member (per unit) if they are knowledgeable of first responder duties in the event of a PREA allegation (separate, preserve, request victim evidence, ensure perpetrator does not destroy evidence).
5. Are PREA signs appropriately displayed and visible for all inmates?
6. Are the officers announcing that female staff will be entering the unit and is the announcement documented in the log book?

This enables supervisory staff to ensure policies and procedures regarding PREA are being adhered to. The involvement of the supervisory staff weekly duty officer report to include PREA inspections, reviews and questions ***exceeds*** the standard.

Facility camera locations were reviewed and camera screens were cleaned during the audit to enhance the view in the housing units.

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)

NA- MVCC does not house 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

BOP Transgender transmittal letter sent by Paul Juster, Oversight BOP dated May 16, 2014 reaffirms that contract modification #121 Program Statement 6031.01 remains in effect. This program statement has been revised and is now identified as program Statement 6031.03, but under the terms of this contract, PS 6031.01 is to be followed, which states, "Transgender inmates are not assigned to lower security facilities."

There was a facility log book example showing documentation of PREA Announcement of opposite gender entering living units. Review of training curriculum on Cross-Gender Viewing and Searches addressed the training requirements of this standard. Learning Management System PREA In-Service Training Report for the 2013 and 2014 training was reviewed. Strip searches logs from Release and Discharge showing male staff conducted searches of male inmates.

MVCC has not had any incident of cross-gender strip searches or visual body cavity searches during this review period. MVCC does not house female inmates. This standard was verified by staff and inmate interviews.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The Inmate Handbook is both in English and Spanish and is dated 5/2014. The GEO PREA Sexual Assault Brochure is in both English and Spanish. PREA reporting hotline #814-342-5903 is in both English and Spanish. PREA poster is in English and Spanish. Staff have received training on inmates with disabilities. There was an incident of a verbal report allegation using a translator to communicate the information which is dated 8/28/13.

Language Line Interpreter Service contract effective 11/1/11. TTY Phones are available to use by the inmate population if needed. There is a list of four (4) bilingual staff available for inmates who speak Spanish. 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

Corporate PREA Hiring Directive dated 12/14/13 states the following on page 2, paragraph 3 and 4: *"With respect to existing employees, any individual promoted to a PREA related position must complete a PREA Disclosure and Authorization and successfully complete a new background check. Any employee transferring to a PREA related position must complete a PREA employment application and successfully complete a new background check.*

In addition, all employees in PREA related positions are required to complete a PREA Disclosure annually. The PREA Disclosure must be completed as part of the employee's annual performance evaluation (The PREA Disclosure must be attached to the annual performance evaluation). Although the employee is not required to sign their annual performance evaluation, the PREA Disclosure is a condition of employment. In other words, the employee must complete the PREA Disclosure and sign it or face termination of employment."

PREA hiring application includes PREA standard requirements regarding questions on applications. Examples of random files were reviewed with Human Resource Manager. Completed Annual PREA disclosures signed by employees were reviewed. Completed hiring and promotion transfer disclosures were review in files and with HR. Letter of final approval of new employee from BOP, SSIM/COTR for Contractor (Keefe) conditional/final approval letter of employee dated 1/31/14 was reviewed.

Interview with Human Resource staff and other staff support all aspects of the standard.

§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

GEO Corporate Policy 5.1.2-A Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

In June of 2013, construction was completed on a new addition to the Special Housing Unit. The general population units were upgraded with additional beds in each pod. A total of 325 general population beds were added. Population capacity increased from 1495 to 1820. The Special Housing Unit added 54 beds to accommodate the increase of the population.

Review of annual assessment was not specific in regards to identifying blind spots. Camera monitors were reviewed and discovered some areas that were difficult to see, however, the person responsible for the cameras, cleaned the lenses and corrected the deficiency. Verified by staff interviews.

§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)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The Penn Highlands Medical Center Dubois is the hospital designated for forensic exams. The Memorandum of Understanding is with Passages, Inc. was signed May 14, 2014. The telephone number for Passages, Inc. is 1-800-793-3620. This standard was verified by staff 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)

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program (Investigation) revised 1/6/2014 addresses this standard. GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

- a) The number of allegations of sexual abuse and sexual harassment was six (6) PREA allegations. Five (5) allegations resulted in administrative investigations and one (1) allegation was referred for criminal investigation.
- b) Policies listed above addressed this standard. The agency policy regarding the referral of allegations of sexual abuse or sexual harassment for a criminal investigation is published on the agency website www.geogroup.com
- c) The Commonwealth of Pennsylvania State Police MOU dated October 31, 2013 indicates they will provide assistance in criminal investigations.

Two (2) file examples reviewed in this file regarding two separate incidents of staff misconduct with inmates. PREA incidents reviewed on the PREA tracking log for the last 12 months. The PREA tracking log maintained for each year which includes a 30 day reassessment review was reviewed.

§115.31 – Employee Training

XX 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The PREA Lesson Plan dated May 2013 is provided to staff during Annual Refresher Training (ART). There is also updated training provided by the Learning Management System (LMS) for employees in 2013 and 2014. Three (3) PREA training acknowledgements reviewed for 2013 and 2014.

The PREA standard requires PREA training on sexual abuse and sexual harassment be conducted every two (2) years, however, MVCC conducts annual refresher training (ART) which **exceeds** the standard requirement.

Verified by staff.

§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)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The PREA Lesson Plan is provided to staff during Annual Refresher Training (ART). Example of PREA training acknowledgements reviewed. There are nine (9) contractors and six (6) volunteers. All volunteers and contractors have been trained regarding PREA. Verified by volunteer and contract staff.

§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)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014. Policy requires that PREA inmate education is provided to inmates in formats accessible to inmates including Limited English Proficient and inmates with disabilities.

PREA posters are located throughout the facility to include the following areas: Main Lobby, visiting, kitchen, main corridors, booking, R & D, medical and medical exam rooms, all living units, program and work areas.

The memo explaining Inmate Education Process at Intake dated June 4, 2014 states: "Inmates receive a copy of the MVCC Handbook and a copy of the Bureau of Prison handout concerning PREA. In addition, within the first 28 days of their arrival, the inmates will receive, in person, education on PREA. Lastly, PREA pamphlets and posters are posted across the facility."

Inmate Handbook includes PREA information on how to report sexual abuse and sexual harassment is dated May 2014 and is in both English and Spanish. The BOP Handout PREA Overview dated November 2009 is both in English and Spanish. The GEO Pamphlet and Posters are both in English and Spanish. The Admissions and Orientation (A & O) PREA Training Curriculum and Admissions and Orientation Sign-in Sheets were reviewed indicating inmates have received PREA training.

The inmates are aware on reporting sexual abuse and sexual harassment incidents and they can also report to outside agencies. The PREA hotline flyer is in both English and Spanish. Inmates may use the PREA reporting hotline #814-342-5903. They may also send a letter to the Office of the Inspector General at Office of the Inspector General, P.O Box 27606, Washington, D.C. 20530. Inmates may also write to an victim advocates at Passages, Inc. 90 Beaver Drive, Suite 212 D, Dubois, PA 15801. Staff can privately report sexual abuse and sexual harassment of inmates to supervisors or through the website www.geogroup.com.

Interviews with staff and inmates verified this standard.

§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)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The following Basic PREA Training-LMS print-out, Basic PREA Training Acknowledgement, Specialized training LMS Print-out were reviewed. Specialized training curriculum includes techniques for interviewing sexual abuse victims, trauma and victim response, the forensic exam and role of victim advocates, 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 were included in the PREA training curriculum.

There are two (2) staff at MVCC that have received certification in Specialized Investigator Training. One investigator received training 8/7/2013 and the other 6/21/2014. This standard was 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The Medical staff do not conduct forensic exams. Forensic Exams are conducted at Penn Highlands Medical Center Dubois.

Reviewed training against the Medical Department Faces and Spaces roster of employees. The following PREA training for medical staff were reviewed: Learning Management Systems for Medical/Mental Health Specialized Training, training acknowledgements for all Medical/Mental Health Specialized training, Medical/Mental Health Specialized Training Curriculum, Learning Management System for Medical/Mental Health-Basic PREA education and training acknowledgments for all Medical/Mental Health- Basic PREA education were reviewed and meet the standard requirements. This standard was verified by 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The Initial Risk Screening was reviewed and addressed the requirements of the standard. Thirty (30) day vulnerability reassessment examples were reviewed on three inmates. This standard was verified by 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)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014. MVCC Case Management Policy 022.03 Case Management Policy dated May 2014.

All inmates are assessed upon arrival, with a reassessment occurring 30 and 90 days.

- (a) The risk screening instrument is used to assess sexually victimized inmates from those at high risk of being sexually abusive.
- (b) Determinations are made on a case-by-case basis.
- (c) No transgender or intersex inmates are assigned to MVCC per BOP letter which indicates these inmates are not sent to low security facilities (see below)
- (d) There are currently no transgender or intersex inmates at MVCC.
- (e) Inmates own views are given consideration when being interviewed.
- (f) No transgender or intersex inmates assigned to MVCC.

Reviewed the Population Monitoring Census Roster which assists in indicating potential victims and assists staff in screening those potential victims for proper placement in housing units, bed assignments, work assignments, as well as education and program assignments.

There are no transgender inmates assigned to MVCC. BOP Transgender transmittal letter sent by Paul Juster, Oversight BOP dated May 16, 2014 reaffirms that contract modification #121 Program Statement 6031.01 remains in effect. This program statement has been revised and is now identified as program Statement 6031.03, but under the terms of this contract, PS 6031.01

is to be followed, which states, "Transgender inmates are not assigned to lower security facilities."

§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)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

There has not been any use of involuntary segregation for high risk of victimization.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard.

The inmate handbook contains information regarding inmate reporting in both Spanish and English dated 5/2014. The PREA hotline flyer is in both English and Spanish. Inmates may use the PREA reporting hotline #814-342-5903. There is a GEO Employee reporting poster in both English and Spanish with specific contact information. There is also a GEO Inmate reporting pamphlet in both English and Spanish.

There are multiple ways for inmates to privately report sexual abuse and sexual harassment. Inmates can report it to a staff member, such as a teacher, chaplain, counselor, medical/mental health staff or an officer. An inmate can file an emergency grievance directly with the Field Office Director. The inmate can write directly to the Warden or PREA Coordinator. They can send the Warden or PREA Coordinator an Inmate Request to Staff Member (cop-out) or a letter reporting the sexually abusive behavior. They may also send a letter to the Office of the Inspector General at Office of the Inspector General, P.O Box 27606, Washington, D.C. 20530. Inmates may also write to a victim advocates agency at Passages, Inc. 90 Beaver Drive, Suite 212 D, Dubois, PA 15801. Staff can privately report sexual abuse and sexual harassment of inmates to supervisors or through the website www.geogroup.com.

There is an example of a verbal report from an inmate using a translator dated 8/28/2013. 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014. MVCC-ADM-009.08 Administrative Remedy Procedure dated May 2014.

Inmate handbook is in both English and Spanish contains information for filing sexual assault or sexual harassment related grievance. There have been no grievances that allege sexual abuse. This standard was verified by staff and inmate interviews.

§115.53 – Inmate Access to Outside Confidential Support Services

XX 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

Inmate handbook addressing access to outside confidential services, such as contact information for Passages, Inc. dated 5/2014 is in both English and Spanish. Information is also in the handbook on contacting the Office of Inspector General at P.O. Box 27606, Washington, D.C. 20530. Memorandum of Understanding with Passages, Inc., 90 Beaver Drive, Suite 212D, Dubois, PA 15801 which is signed 5/14/2014. There is a Passages, Inc. pamphlet which includes phone numbers and services. PREA reporting hotline #814-342-5903 information is in both English and Spanish. The PREA Compliance Manager also visited the Passages, Inc. office which **exceeds** the standard. This standard was verified by staff and inmates.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

There is also a website for third party reporting through the GEO Group website which is www.geogroup.com to report sexual abuse or sexual harassment on behalf of the inmates.

There is a GEO Employee PREA reporting poster in both English and Spanish. PREA reporting hotline #814-342-5903 is in both English and Spanish.

Staff can privately report to the Chief of Security or Facility Management Team. The staff member can also privately report an incident of sexual abuse or sexual harassment by calling the Employee hotline, which is an independent professional service available 24/7. They can report privately through www.reporhotlineweb.com/geogroup. Staff can also call the toll free # 1-866.568-5424 or the Corporate PREA Director at 561-999-5827.

Inmates can report to the facility administrator, a staff member, by phone, in person, anonymously or in writing. Inmates can also contact the FBOP National PREA Coordinator, Corrections Program Division, 320 First Street, N.W. Room 554, Washington, D.C. 20534. Inmates may also call the Federal Bureau of Prisons Office of Internal Affairs at 320 First Street, N.W., Room 600, Washington, D.C. 20534. This standard was verified by staff and inmate interviews.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

MVCC has not received any reports of abuse from anyone considered vulnerable under the Pennsylvania Vulnerable Person Statute. This standard was verified by staff interviews.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

An investigation example file reviewed which indicated allegation was unfounded. MVCC has not had any reports of an inmate being subjected to substantial risk of imminent sexual abuse. 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

MVCC received one (1) allegation from an inmate that he alleged abuse from an incident in 1991 while confined at another facility. Email notification from MVCC Warden to TDCJ Warden was reviewed. Verified by interview with the Warden.

§115.64 – Staff First Responder Duties

- XX** 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

There is a PREA First Responder Card issued to officers with instructions on what to do if there is a sexual assault incident. The PREA Training Curriculum information shows First Responder duties. There have been no incidents at MVCC which required implementation of all 4 first responder duties listed in this standard.

The PREA First Responder card helps the employee with their duties and responsibilities in regards to PREA which also **exceeds** the standard. This standard was verified by staff interviews.

§115.65 – Coordinated Response

- 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

There is a response plan for MVCC staff in regards to PREA incidents. The PREA Response Plan is dated 5/19/2014.

§115.66 – Preservation of Ability to Protect Inmates from Contact with 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The Union is International Union Security, Police and Fire Professionals of America (SPFPA) and its amalgamated Local 502 dated March 31, 2014.

The Union agreement does not prohibit GEO MVCC from removing alleged staff sexual abusers from contact with inmates pending the outcome of the investigation.

§115.67 – Agency Protection Against Retaliation

- 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

Sean Bresnahan, Psychologist is assigned responsibility to monitor retaliation. The Protection from Retaliation Logs were reviewed which indicates there have been no incidents of retaliation in the past twelve (12) months. 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

Available Alternatives Assessment was done on an inmate alleging sexual abuse. Protective Custody was established per staff memo for this inmate. Required BOP 292 forms on Inmate were completed. Special Housing Unit with thirty (30) Day Psychological Evaluation was completed. The allegation of sexual abuse on this inmate was considered unfounded. Forensic medical examination was negative. 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)

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program (Investigation) revised 1/6/2014 addresses this standard. GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

There was one (1) criminal allegation referred to Office of Internal Affairs (OIA) Investigation regarding a staff and inmate relationship investigation. There were five (5) allegations handled administratively. Four (4) of these allegations were unfounded and one (1) was unsubstantiated.

Verified by staff interviews.

§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)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard.

Example of incident report 4/6/14 regarding third party reporting. Incident investigated and was unfounded.

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)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

There are (six) 6 allegations of sexual abuse/sexual harassment and five (5) were notified of outcome of allegations. One inmate left the facility before investigation began.

Verified by staff interview.

§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)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. GEO Policy 7.1.4 Staff Misconduct Reporting dated 4/1/10 addressed this standard. MVCC Policy 3.2.10 Sexual Harassment and Workplace Harassment dated 3/31/10. MVCC Policy Human Resources 018.03 Sexual Harassment and Workplace Harassment Policy dated September 2011.

The 2013 GEO Employee Handbook addressed this standard. Personnel Action Termination Form of employee dated 5/1/14 addressed this standard.

Verified by staff interviews.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

At this time, there have been no corrective actions against contractors or volunteers.

§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)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard.

MVCC Inmate handbook- Prohibited Acts and sanctions revised 5/2014 addressed this standard. There have been no PREA related disciplinary reports in the past 12 months.

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)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

The Initial screening assessments within fourteen (14) days corresponding with follow-up treatment (which inmates indicated refusal) reviewed on two (2) inmates. 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

Reviewed medical and mental health notes for a victim of alleged assault. Inmate is doing well since being removed from general population compound.

Verified by 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

MVCC does not house females and there have been no PREA incidents which resulted in ongoing medical or mental health follow-up or treatment plans.

(a) , (b), (c) Inmate risk assessment and follow-up treatment plan reviewed.

(d), (e) No females housed at RCDC III.

There is no financial cost to the inmate for medical or mental health treatment due to an incident of sexual abuse.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

PREA after action review report was reviewed; there is no need to place additional cameras in the units as identified blind spots have been corrected. The facility will continue to monitor all areas through PREA rounds and annual assessments. Verified by staff 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

GEO policy 5.1.2-A, section 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 contain 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014.

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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. MVCC Policy 013.05 Sexually Abusive Behavior Prevention and Intervention Program (PREA) dated January 2014 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
Auditor Signature

December 29, 2014
Date