

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of facility:		Reeves Correctional Detention Center-III	
Physical address:		100 West County Road 204, Pecos, Texas 79772	
Date report submitted:		December 29, 2014	
Auditor Information		Cathy Slack	
Address:	P.O. Box 278 Florence, CO 81226		
Email:	casconsulting@outlook.com		
Telephone number:	719-429-5158		
Date of facility visit:		July 22-24, 2014	
Facility Information			
Facility mailing address: <i>(if different from above)</i>			
Telephone number:			
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:		Catarina Martinez	Title: Education Director/Programs Manager
Email address: camartinez@geogroup.com			Telephone number: 432-556-2571
Agency Information			
Name of agency:		The GEO Group, Inc.	
Governing authority or parent agency: <i>(if applicable)</i>			
Physical address:			
Mailing address: <i>(if different from above)</i>		One Park Place, Suite 700, 621 Northwest 53 rd Street, Boca Raton, Florida 33487	
Telephone number:		561-999-5827	
Agency Chief Executive Officer			
Name:	George C. Zoley	Title:	Chairman of the Board, CEO and Founder
Email address:	gzoley@geogroup.com	Telephone number:	561-893-0101

Agency-Wide PREA Coordinator			
Name:	Phebia L. Moreland	Title:	Director, Contract Compliance, PREA Coordinator
Email address:	pmoreland@geogroup.com	Telephone number:	561-999-5827

AUDIT FINDINGS

NARRATIVE:

The entrance meeting began on Monday August 4, 2014 at 7:30 a.m. The following staff were in the entrance meeting: Warden Ricardo Martinez, Deputy Warden Joseph Gustin, PREA Compliance Manager Catarina Martinez and Major Oscar Solis. Central Region Director of Operations Gerry Maldonado, GEO Corporate office PREA Coordinator Phebia Moreland and Bureau of Prisons, SSIM Monitor John Yates was also present.

It was decided to begin the tour early due to the extreme hot weather in Pecos, Texas during this time of year. The areas toured on the first day from 7:50 a.m. to 10:30 a.m. were housing units A, B, and C and the administrative and disciplinary segregation units. Each of the general population units have ten (10) pods with a central common area that is utilized by the inmates as dayroom space. The kitchen, laundry, intake and program areas were also toured. Also, on the first day, procedures and operations related to PREA were reviewed. Cameras viewing including camera scanning of inmate housing, program and work areas were viewed in the main control center and interviews with random staff were conducted on the first day of the PREA audit.

On Wednesday, July 25th the 2nd day of the audit, interviews of 22 staff were conducted and a random review of inmate files, staff training records and all PREA investigation files occurred until 5:30 p.m. On day three, Human Resource files were reviewed and random and specialized interviews were conducted. The night before the first day of the audit, I asked for an alpha listing of all inmates housed at the facility and randomly selected at least two-three inmates from each housing unit and 9 of those inmates were limited English Speaking. There was one (1) LGBTI, one (1) victim and one (1) sexual abused inmate interviewed. There were no disabled inmates to interview at RCDC III.

There were three (3) sexual assault/harassment allegation cases, all relatively recent within the past 12 months, one (1) was unsubstantiated and two (2) were unfounded. There is one allegation against a staff member for sexual abuse and is still an open case.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Reeves County Detention Center III is considered as one facility of the Reeves Complex in Pecos, Texas. RCDC Complex consists of three compounds identified as R-1, R-2, and R-3 in a total of 400,000 square feet. The R-1 and R-2 compounds consist of multiple housing units within a secure perimeter. Included in the compound are indoor/outdoor recreational areas, a central programs building, a centralized food service facility, and a support building consisting of laundry and warehouse. An administrative building is provided outside the compound perimeter fences. An immigration courtroom is located in the R-2 building. There is also an outside separate building where five (5) BOP Contract staff provides oversight monitoring of the Reeves I, II and III Complex. There are shared services for Human Resources, Training and the Records Department.

The Reeves County Detention Center III is a separate low minimum security facility located in Pecos, Texas approximately 120 miles from Midland, Texas. The facility was constructed in December 2002, on approximately 80 acres. RCDC III consists of three housing units: Unit A, Unit B, Unit C with ten (10) pods each and approximately 45-50 beds in each pod. There is also a Special Housing Unit which

contains administrative segregation and Disciplinary Segregation. During the audit, there were 69 beds used in the Special Housing Unit. There is a centralized program building, food service, laundry, medical and indoor/outdoor recreation. An administration building, armory and warehouse are located on the exterior of the secure perimeter. The GEO Group, Inc. began operating under a contract in 2004 with Reeves County to manage the facility. RCDC III originally housed male offenders from Arizona. In January 2007, a contract was awarded by the Federal Bureau of Prisons (BOP) to house low security criminal alien male offenders, the majority to be deported following the completion of their sentences.

The administrative management team are employees of the GEO Group, Inc. The remainder of the staff are employed by Reeves County. Commissary services are provided by contract to Midstates Services, Inc. Medical Services are contracted to Physicians Network Association. Both water and waste management treatment are provided by the City of Pecos.

The Mission was revised January 2014. The RCDC III mission is stated as follows: "The mission of the Reeves County Detention Center III (RVS) is to ensure the Bureau of Prisons receives high quality, cost effective, and comprehensive privately managed prison service. Reeves County Detention Center III (RVS) shall accomplish our mission perform our contractual obligation to the Bureau of Prisons through the continued assessment and improvement of all areas of operation. The working philosophy of Reeves county Detention Center III (RVS) is built on the foundation of a sound correctional charter; preservation of public safety, provision of a healthful environment, balanced nutritional diet and productive activities including education, vocation, and work opportunities to the criminal alien inmate population at Reeves County Detention Center III (RVS)."

EXIT BRIEFING

An exit briefing was held on Thursday, July 24, 2014 at 4:00 p.m. with Warden Ricardo Martinez, Deputy Warden Joseph Gustin, Major Oscar Solis and PREA Compliance Manager Catarina Martinez. A representative staff member from the Central Region was Central Region Director of Operations Gerry Maldonado and from GEO Corporate office PREA Coordinator Phebia Moreland. The Bureau of Prisons Contract Monitor, SSIM Monitor John Yates was also present and on conference call was Reed Smith-Central Region Vice-President.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

There is a facility organizational chart which designates the PREA Compliance Manager who reports to the Warden with dual supervision by the GEO Agency PREA Coordinator.

The RCDC III Inmate Handbook is both in English and Spanish. The PREA Orientation video is both in English and Spanish. There are PREA posters located and posted in each housing unit both in English and Spanish.

The RCDC III annual in-service training addressed the zero tolerance of sexual assault and sexual harassment in RCDC III. Orientation Pre-Service Training dated 5/18/13 indicates staff have been trained.

RCDC III has not received any transgender or intersex inmates, nor has one self-identified. There is a letter from BOP Oversight which remains in effect of the date of this audit that "Transgender inmates are not assigned to lower security facilities."

Standard 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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

The contracts are updated with the Federal Bureau of Prisons to include PREA language and the Contract Assurance Plan dated August 20, 2013 also includes pertinent PREA information. During the last contract monitoring audit of June 25, 2014, there were no deficiencies.

There are approximately 133 cameras strategically placed throughout the facility utilized for video monitoring. The auditor reviewed the camera placement throughout the facility.

§115.13 – Supervision and Monitoring

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

The **GEO Facility Annual Assessment** dated 2/16/2014 indicates the following information:

- 1) The facility operates with safe and sound 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) The external oversight by BOP has identified staffing within the Health Services department to be below the required 85% level. See Section II; 5) There are minimal areas within the institution where “*blind spots* or *areas of isolation* exist” ; 6) The composition of the inmate population is male, low security, and deportable by INS; 7) The facility has a sufficient number of supervisory staff assigned to each 12 hour shift; 8) The majority of institution programs occurs on the 0600-1800 shift; 9) The facility adheres to applicable regulations and standards; 10) There have not been any substantiated incidents of sexual abuse during the assessment period. However, three allegations of sexual abuse of inmates are currently under investigation by the proper authorities (inmate pat-search allegations); ***Status checked during the PREA audit 7-22 to 7-24, one allegation has been unsubstantiated and two were unfounded.*** 11 NA
- 2) RCDC III has maintained an active staffing plan above 90% with no deficiencies in operation staffing or supervision. The facility complies with the staffing plan established in the contract with the Federal Bureau of Prisons, with the following exception: Since August 2012, the Health Services Department has been unable to remain staffed at the required 85% level, despite numerous recruitment efforts by CHC, the company contracted to provide medical services to the facility. The Licensed Vocational Nurse (LVN) positions were the source of the largest percentage of vacancies within Health Services. During the assessment year (August 2012-August 2013), the lowest Health Services staffing level was 73.48% and the highest staffing level was 84.77%. ***Medical status of staffing was checked on 7/24/14 and the staffing level was at 79.24%.*** RCDC III continues to aggressively recruit by offering Incentives such as sign-on bonuses and housing assistance. It is important to note that there has been no decrease in the medical services offered to the inmate population during the assessment period. Health Services has continued to provide the medical services through the use of overtime.

RCDC III has undergone a major camera upgrade/addition 2012/2013. This addition provided adequate coverage of isolated areas to address and deter acts related to sexual abuse/assault in accordance with PREA standards.

RCDC III has identified areas in which reflective mirrors would be beneficial to provide increased viewing of stairwells and corners having low visibility. In addition, shower curtains continue to be added to showers and restrooms for additional inmate privacy which prevents possible opposite gender viewing. The facility will continue to heavily recruit for the vacant positions in the Health Services Department. The facility maintains cameras surveillance of all inmates living areas and recreational areas, as well as a continual staff presence.

There are vacant positions at RCDC III; however, the facility continues to adhere to the staffing plan outlined in the contract with the Bureau of Federal Prisons. During the months when there are vacancies, overtime and call backs are used to ensure each position are filled and staffing levels adhered to. There have been no findings of inadequacy by judicial, federal investigative agencies and or any internal or external oversight bodies. Any deviations to the staffing plan are documented and justified in writing. The PREA Compliance Manager is involved in the staffing meetings in regards to PREA.

There are approximately 133 cameras strategically placed throughout the facility utilized for video monitoring. The auditor reviewed the camera placement throughout the facility.

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)

RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

N/A no youthful offenders.

§115.15 – Limits to Cross- Gender Viewing and Searches

- 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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

- (a) Cross Gender Pat Down searches are prohibited except in exigent circumstances. To date there has not been any occurrences of cross gender viewing (strip searches, pat searches or body cavity searches) conducted on inmates of this facility.
- (f) There is a four (4) hour training entitled GEO 131 PREA 2013 and the curriculum is dated 2/14/13 and a two (2) hour training GEO 293 PREA In-Service Training dated 10/21/13.

RCDC III has not conducted a cross gender strip search or body cavity searches in the last 12 months. There are no transgender or intersex inmates at RCDC III. There are no female inmates at RCDC III.

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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

- (a) All inmates receive information which addressed Sexual Abuse and Sexual Harassment during orientation which is communicated orally and in writing in English and Spanish. The PREA postings are both in English and Spanish in the housing units. Orientation is provided in English and Spanish. The PREA Orientation video is in English and Spanish. The Inmate Handbook dated January 2014 is also in English and Spanish. There is #47 (confidential hotline) phone number to report sexual assaults or sexual abuse incidents. There are **TTD phones** available for the inmate population.
- (b) GEO has a contract with **Universal Translator Interpreting Services** for Interpreting Services. There are also **facility designated interpreters** to be used during PREA investigations. These staff have received training in their role as interpreter and their role during the interviews.
- (c) There are no deaf or blind inmates at RCDC III. RCDC has not used an inmate reader or inmate assistant, interpreter or assistant related to any PREA incident.

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 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard. RCDC III Policy 03.004 Personnel Selection and Retention dated 2/22/2013 addressed this standard.

This information is addressed on the Application Package for GEO. There is also a disclosure and authorization form that staff needs to sign for promotions and this documentation was reviewed.

Interview with Human Resources and general interviews with staff support all aspects of this 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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard.

RCDC III has undergone a major camera upgrade/addition 2012/2013. This addition provided adequate coverage of isolated areas to address and deter acts related to sexual abuse/assault in accordance with PREA standards. RCDC III had approximately 50 cameras before the additions. RCDC III then added 83 more cameras throughout the year of 2013 beginning in January of that year. There are now a total of 133 cameras.

RCDC III has identified areas in which reflective mirrors would be beneficial to provide increased viewing of stairwells and corners having low visibility. Mirrors have been added to education and the hobby craft area.

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 dated 4/14/14 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and

Intervention Program dated 2/23/2014 addressed this standard. RCDC III Physician's Network Association Policy C-13 Sexual Assault addressed this standard.

There is a Memorandum of Understanding for Reeves, I, II and III with the Crisis Center/Angel House dated 5/2/14. The PREA Compliance Manager went to meet with staff at the Crisis Center/Angel House on site and staff from the Crisis Center/Angel House visited and toured RCDC III so that a better understanding of services could be provided.

RCDC III sends out all forensic exams to Odessa Medical Center Hospital. The Website for Odessa Medical Center is <http://www.medical/centerhealthsystems.com>. There were no forensic exams conducted in the past 12 months at RCDC III.

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)

BOP Policy 5324.11 Sexually Abusive Behavior Prevention and Intervention Program (Investigation) revised 1/6/2014 addressed this standard. GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

- (a.) During the past 12 months, the number of allegations of sexual abuse and sexual harassment was 3 and all 3 resulted in administrative investigations. There have been no allegations referred to criminal investigations.
- (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.) Pecos Sheriff Department is responsible for conducting any criminal investigations.

A PREA tracking log is maintained for each year which includes a 30 day assessment review.

§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. GEO Corporate Policy 5.1.2 –E Investigating Allegations of Sexually Abusive Behavior dated 4/14/14 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

There is a (four) 4 hour initial PREA training called GEO 131 which was developed 2/14/13 and a two (2) hour training GEO 293 PREA (In-Service) Training developed 10/21/13. The PREA Training Curriculum addressed this standard. There are signed acknowledgements from staff attending training that they read and understood the PREA training. There are PREA allegation and tracking logs to monitor PREA allegations.

The PREA standard requires PREA training on sexual abuse and sexual harassment be conducted every two years, however, RCDC III conducts an annual refresher which *exceeds* the standard requirement of every two years.

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.

(a) All volunteers who have contact with inmates have been trained regarding PREA. There are three (3) volunteers and twenty-one (21) contractors.

Verified by volunteer and contract staff interviews.

§115.33 – Inmate Education

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 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

(a) During intake inmates receive orientation on PREA.

(b) Inmates receive the PREA information in orientation within seven (7) to fourteen (14) days after arrival.

- (c) All current inmates have received PREA information with the PREA Inmate handbook which is both in English and Spanish. Inmates sign an acknowledgment of Admission and Orientation which includes PREA information.
- (d) Inmates have access to interpreters and TTD phones. There are several staff on each shift to assist with interpreting. There are also Universal Translator Interpreting Services and facility to assist with PREA issues.
- (e) There is also an NIC PREA video Orientation with acknowledgment signature sheets indicating inmates received PREA orientation.
- (f) There is a PREA Orientation power point training in English and Spanish for inmates. The PREA Orientation video is the NIC video utilized for training. All inmates receive information on Sexual Abuse and Sexual Harassment during orientation which is communicated orally and in writing in English and Spanish.

The Housing Unit PREA postings are both in English and Spanish. There are PREA brochures for inmates both in English and Spanish.

The toll free hot line number #47 is posted in all inmate housing units. Furthermore, the 1-800 numbers is a free, private non-monitored telephone call.

The PREA Manager also conducts weekly meetings to ensure that inmates have been informed on Sexual abuse and Sexual harassment which **exceeds** the standard. The PREA orientation is conducted within 7-14 days which **exceeds** the standard.

Interviews with staff and inmates verified this standard.

§115.34 – Specialized Training: Investigations

- 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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

Review of Training Curriculum which 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 in referral. There were seven (7) facility staff who received specialized investigative training. Two staff were certified as investigators on July 2, 2013.

§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)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

PREA Training for Medical and Mental Health staff was documented and a signed acknowledgement was verified. There was also a Learning Management Systems (LMS) webinar administered specifically for medical staff which was provided by the corporate office.

RCDC III does not conduct forensic exams they are conducted at Odessa Medical Center Hospital.

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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

The screening instrument addressed all the required elements of the standard. Inmate's risk level for sexual victimization or abusiveness is reassessed within 21 to 27 days. This is conducted at intake with the PREA Questionnaire/Assessment form and then within 21 to 27 days they are reassessed again by their case manager.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

All inmates are assessed upon arrival, with a reassessment per policy occurring 30 and 90 days. There are no Transgender or intersex inmates at RCDC III-3.

- (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 RCDC III per BOP letter which indicates these inmates are not sent to low security facilities.
- (d) There are currently no transgender or intersex inmates at RCDC-III.
- (e) Inmates own views are given consideration when being interviewed.
- (f) No transgender or intersex inmates assigned to RCDC-III.

§115.43 – 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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

There have not been any incidents where an inmate with a high risk of sexual victimization being housed involuntarily in segregation/protective custody.

§115.51 – Inmate 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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

- (d) 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 staff or an officer. An inmate can file an emergency grievance directly with the Field Office Director. Information is provided on the PREA Posters with the PREA hotline #47 that inmates can call free of charge. There is also information in the Inmate Handbook on how to report an incident of sexual abuse or sexual harassment. The Inmate Handbook has contact information on the Crisis Center/Angel House for inmates. The Memorandum of Understanding is with The Crisis Center/Angel House P.O. Box 7741, Odessa, Texas 79760 dated 5/2/14. The hotline is #47 or 13 3's. The telephone number for The Crisis Center/Angel House in the inmate handbook is 432-333-2527. The PREA Compliance Manager visited the Crisis Center/Angel House and the staff from the Crisis Center visited RCDC III.

- (e) Inmates can report abuse or harassment to a public or private entity or office that is not part of the agency. Inmates detained for solely civil immigration purposes can send a letter to their designated consulates. Addresses are posted along with phone numbers for inmates to contact the Consular's office directly. Information is provided on the PREA Posters with PREA hotline #47. The inmate can write to The Office of Inspector General in Washington, D.C. address is included in the Inmate Orientation handout and Inmate Handbook.
- (f) Staff are able to accept verbal, written and anonymous reports and can submit the information to their direct supervisor or the PREA Compliance Manager.
- (g) Staff can privately report to the Chief of Security or facility management team. The staff member can also privately report through www.reporthotlineweb.com/geogroup. Staff can also call the toll free #1-866-568-5425 or the Corporate PREA Director at 561-999-5827. Staff can privately report sexual abuse and sexual harassment of inmates to supervisors or through the website www.geogroup.com.

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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

Inmate handbook dated 1/1/2014 contains relevant information for filing a Sexual Assault/Harassment related grievance. There were no emergency grievances filed pursuant to this standard.

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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

The Inmate Handbook has contact information on the Crisis Center/Angel House for inmates.

The Memorandum of Understanding is with The Crisis Center/Angel House P.O. Box 7741, Odessa, Texas 79760 dated 5/2/14. The telephone number for The Crisis Center/Angel House is 432-333-2527. The hotline is #47 or 13 3's.

The PREA Compliance Manager visited the Crisis Center/Angel House and the staff from the Crisis Center visited RCDC III to ensure the Crisis Center understood the reason for the Memorandum of Understanding and their support in regards to the inmate population. This was not required by the standard and was above and beyond the requirement which **exceeds** the standard.

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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard.

Employee PREA Posting and brochure addressed this standard. There is a website for third-party reporting which is www.geogroup.com to report sexual abuse or sexual harassment on behalf of the inmates.

Staff can privately report to the Chief of Security or Facility Management Team. The staff member can also privately report 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.reporthotlineweb.com/geogroup. Staff can also call the toll free #1-866-568-5425 or the Corporate PREA Director at 561-999-5827.

Inmates can report to the facility administrator, a staff member, by phone, in person, 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.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

RCDC III has not received any reports of abuse from anyone considered vulnerable under the Vulnerable Persons Statute for Texas. Training Curriculum was reviewed regarding PREA requirements.

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 & Intervention Program dated 4/11/14 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

RCDC III did not have any reports of an inmate being subjected to substantial risk of imminent sexual abuse.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard

There were two (2) allegations received from inmates alleging they were abused while confined at another facility. The Warden contacted Warden of the facility named by the inmates telephonically. Notification letters with corresponding investigation were also sent to the Warden of the facility named by the inmate where the incident occurred.

Verified by Warden interview.

§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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

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. To date there has not been any PREA incidents requiring implementation of all 4 steps of the first responder duties.

The PREA First Responder Card helps the employee with their duties and responsibilities in regards to PREA which also **exceeds** the standard.

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)

RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard. There is a RCDC III Emergency plan EA-22 dated 7/1/2014 addressed coordinated efforts in response to incidents of sexual abuse or sexual harassment.

PREA Incident Checklist for sexual abuse and sexual harassment provides information for a coordinated response to PREA incidents.

§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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard. Policy on Emergency Plan EP-22 dated 7/1/14 addressed this standard.

This standard is to prevent agencies from entering into an agreement (e.g. a collective bargaining agreement) that would stop the agency from removing an alleged staff sexual abuser from a post that involves interaction with inmates as a preventive measure during an investigation or a determination about discipline.

RCDC III does not have a collective bargaining agreement.

§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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

Catarina Martinez, Education Director/PREA Compliance Manager as well as Fred Bullock, Program Manager are responsible for monitoring possible retaliation. PREA retaliation logs were also reviewed. There were no incidents of retaliation at RCDC III in the past 12 months.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

To date there has not been any incident where an inmate is housed in protective custody following an allegation of sexual abuse.

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)

BOP Policy 5324.11 Sexually Abusive Behavior Prevention and Intervention Program (Investigation) revised 1/6/2014 addressed 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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard

There were three allegations, 1 unsubstantiated and 2 unfounded.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

A completed PREA incident report was reviewed and the incident was regarding a pat search by a staff member and the incident was unfounded. PREA logs and files were reviewed.

This standard 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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

There were three (3) allegations of alleged inmate sexual abuse investigations completed by the facility in the last 12 months. Of the alleged sexual abuse investigations that were completed in the past 12 months, one (1) inmate was notified, verbally or in writing of the results of the investigation. One inmate was released prior to the completion of the investigation. There is 1 pending final review. There were no investigations completed by an outside agency in the last 12 months.

This standard was verified by staff interviews.

§115.76 – Disciplinary Sanctions for Staff

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

There were no staff from the facility that have violated agency sexual abuse or sexual harassment policies. The Employee Handbook contains information on Sexual Assault, Sexual Harassment. There have not been any staff that violated agency policy on sexual abuse or sexual harassment in the past 12 months.

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-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard. GEO Employee handbook 2013 addressed this standard.

There have been no contractors/volunteers reported to law enforcement agencies for engaging in sexual abuse of inmates.

Verified by staff interviews.

§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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

There were no administrative or criminal findings of inmate on inmate sexual abuse that have occurred at the facility in the past 12 months. Inmate handbook addressed this standard.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

In the past 12 months, there have not been any incidents where prior victimization needed to be reported by medical/mental health staff. There is a 14 day follow-up by Mental Health staff.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

RCDC III has not referred any inmate to emergency medical or mental health services in the past 12 months.

Verified by staff and inmates.

§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 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

(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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

There were 3 investigations of alleged sexual abuse completed at this facility and all were followed by a sexual review within 30 days.

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

Corporate 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 contains both inmate on inmate and staff on inmate sexual abuse and harassment cases. GEO also has a PREA Incident Report Survey. Data is collected internally and GEO's data is aggregated with every private facility with which it contracts for the confinement of its inmates. Reports are posted on the PREA page which can be found in "About Us" section of GEO's website.

§115.88 – Data Review for Corrective Action

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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. RCDC III Policy 10.003 Sexual Abuse/Assault Prevention and Intervention Program dated 2/23/2014 addressed this standard.

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

GEO does prepare annual reports in accordance with data collection standards. Data is collected internally and GEO's data is aggregated with every private facility with which it

contracts for the confinement of its inmates. Reports are posted on the PREA page which can be found in "About Us" section of GEO's website.

AUDITOR CERTIFICATION:

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

Cathy Slack
Auditor Signature

December 29, 2014
Date