

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of facility:		Riverbend Correctional Facility	
Physical address:		196 Laying Farm Road, Milledgeville, GA 30161	
Date report submitted:		December 19, 2014	
Auditor Information		Katherine Brown	
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Telephone number:		727-470-4123	
Date of facility visit:		June 9-11, 2014	
Facility Information			
Facility mailing address:		Same as above	
Telephone number:			
The Riverbend Correctional Facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input 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 type="checkbox"/> Prison	
Name of PREA Compliance Manager:		Title:	Compliance Manager
Keith Kelly		Telephone number:	478-414-2394
Email address:			
Agency Information			
Name of agency:		GEO Group Inc.	
Governing authority or parent agency:		Same as above	
Physical address:		One Park Place, Suite 700 621 NW 53 rd St Boca Raton, Florida 33487	
Mailing address:		Same as above	
Telephone number:			
Agency Chief Executive Officer			
Name: George Zoley		Title:	Chairman of the Board, CEO and Founder
Email address: gzoley@geogroup.com		Telephone number:	561-999-5827
Agency-Wide PREA Coordinator			
Name: Phebia Moreland		Title:	Director, Contract Compliance, PREA Coordinator
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AUDIT FINDINGS

NARRATIVE:

The audit of Riverbend Correctional Facility was conducted on June 9-11, 2014 by Katherine Brown, Certified PREA auditor. The areas toured were a total of six housing units. Four units are dormitory style with four pods each, housing 250 offenders. One housing unit contains two dormitory style pods and two cell housing pods, housing 250 offenders. One housing unit contains four cell housing pods, for 250 total offenders. One segregation unit contains 48 beds for administrative segregation and 24 beds for disciplinary detention/isolation. Other areas toured included the kitchen, laundry, programs area, and work areas.

An entrance meeting was held with facility staff. The following people were in attendance: Phebia Moreland GEO Corporation; Vanessa Butts-Hawkins Georgia Department of Corrections; Sandra Partain Georgia Department of Corrections PREA Coordinator; Cynthia Cox, Food Service; Tonya Goodman, Food Service; Steve Watson, Administration; Keith Kelly PREA Compliance Manager; Crystal Taylor, Training; Tina Clark, Medical; Catherine Price, Compliance; Terry Holloway, Fire/Safety; Douglas West, Program; Earnest Mintz, Program; Latonya Sallard, Program; Beth Greene, Programs; Barbara Hatcher, Programs; Vernon Neal, Investigator; Patrick Gartland, Security; Fred Head, Warden; Janet Hardwick GEO Contract Compliance.

Following the entrance meeting I toured the Riverbend Correctional Facility from 08:30 – 12:00. On the tour with me was, Phebia Moreland GEO Corporation; Vanessa Butts-Hawkins GDC Facilities; Sandra Partain GDC PREA Coordinator; Steve Watson, Administration; Keith Kelly, PREA Compliance Manager; Catherine Price Compliance; Douglas West, Program; Earnest Mintz, Program; Barbara Hatcher, Programs; Patrick Gartland, Security; Fred Head, Warden; Janet Hardwick GEO Contract Compliance.

The night before the audit I asked for an alpha listing of all inmates housed at The Riverbend Correctional Facility and randomly selected two inmates from each housing unit. There were no limited English speaking inmates that required an interpreter. There were no hard of hearing/vision impaired inmates. There were no transgender/intersex inmates. I also asked for a shift roster and randomly selected staff to interview. On the first day of the audit I conducted the tour and the specialized staff interviews. I also selected random personnel files to verify the criminal background checks for all staff; volunteers and contractors, as well as the five year background re-checks. Georgia Department of Corrections has a policy that requires all security staff to have a background screening performed annually prior to their firearms qualifications.

On day two of the audit I conducted 35 random inmate interviews; I held one interview with an inmate who had reported a sexual abuse claim. I also performed 15 random staff interviews.

On day three I reviewed 27 sexual assault/harassment allegation cases, all relatively recent (within the past year and half) 2 are still pending; 17 unsubstantiated; 2 substantiated and 6 unfounded.

DESCRIPTION OF FACILITY CHARACTERISTICS:

On July 20, 2010, The GEO Group, Inc. (GEO) announced the signing of a contract with the Georgia Department of Corrections for the development and operation of the new 1,500-bed

Riverbend Correctional Facility in Milledgeville, Georgia. This is a Level IV Medium Security facility which houses male offenders.

Housing consists of six housing units. Four units are dormitory style with four pods each, housing 250 offenders. One housing unit contains two dormitory style pods and two cell housing pods, housing 250 offenders. One housing unit contains four cell housing pods, for 250 total offenders. One segregation unit contains 48 beds for administrative segregation and 24 beds for disciplinary detention/isolation.

The mission of The Riverbend Correctional Facility is "to provide an integrated and holistic delivery of individual treatment programming to the offender population. To facilitate this mission, the Riverbend Correctional Facility will provide a safe, secure and cost effective operation, working under contract and in union with the Georgia Department of Corrections. This service will be provided and our mission accomplished by maintaining a high level of internal security through careful selection, continuous training and long term retention of qualified personnel. Riverbend Correctional Facility will provide appropriate and timely programs to the offender population in order to ease their transition back into society and to better their odds of becoming a law abiding and contributing member of society upon their release. Riverbend Correctional Facility operates in full compliance and in accordance with all applicable rules, policies and procedures and will achieve and maintain accreditation from the American Correctional Association for Adult Correctional Facilities."

SUMMARY OF AUDIT FINDINGS:

On June 9-11, 2014, three site visits were completed at Riverbend Correctional Facility in Milledgeville, Georgia. The results indicate:

Number of standards exceeded: 4

Number of standards met: 37

Number of standards not met: 0

Number of standards not applicable: 2

Standard number here 115.11 Zero Tolerance

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

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

Based on policy 5.1.2. III. B. 1 &2. RCF 10.22 Policy A. Based on interview with PREA Coordinator and PREA compliance manager. Review of Organizational Chart

The Riverbend Correctional Facility has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines the facility's approach to preventing, detecting, and responding to such conduct.

The GEO Group employs an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards.

The Riverbend Correctional Facility has a designated PREA compliance manager with sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.

Standard number here 115.12 Contracting with other agencies for confinement of inmates

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

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

Based on policy 5.1.2.A. III. A. 5 (a-b). Based on interview with agency's contract compliance manager. Reviewed GDOC contract.

The Georgia Department Corrections contract is up for renewal June 30, 2014 and will be adding into the contract the entity's obligation to adopt and comply with the PREA standards.

Standard number here 115.13 Supervision and monitoring

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. NENM P&P 12.000 C. 1. (a-g); RCF 10.26.D Post Order 22 II J&K. Based on interview with Warden: PREA Compliance Manager and PREA Coordinator. Reviewed: staffing plan; shift rosters; annual assessment and duty officer rounds.

The Riverbend Correctional Facility has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect inmates against sexual abuse. When the staffing plan was not complied with, they documented and justified all deviations from the plan.

The Riverbend Correctional Facility completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed.

Standard number here 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)

X. Not Applicable

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

Youthful offenders are housed in community corrections facilities.

Standard number here 115.15 Limits to cross gender viewing and searches
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. I. 1-8; RCF 10.22 pg. 10 (a&b); Post Orders pg. 5 General. Reviewed power point and training attendance rosters

The Riverbend Correctional Facility does not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. In the event a cross gender search is done, the facility documents all cross-gender strip searches and cross-gender visual body cavity searches.

The Riverbend Correctional Facility has policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit.

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

The Riverbend Correctional Facility trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

**Standard
number here**

115.16 inmates with disabilities and limited English speaking

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

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

Based on policy 5.1.2. A. III. E. 1 (a-c); RCF 11.12 Policy Based on random inmate and staff interviews and interview with limited English speaking inmates. Reviewed brochure; PREA Poster; Volume control on phone; TTY; Language line; power point-PREA training.

The Riverbend Correctional Facility takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment,

The Riverbend Correctional Facility takes reasonable steps to ensure meaningful access to all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

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

Standard number here 115.17 Hiring and promotion decisions

X. Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. C 2, (a-d) and H 4 (a-c) ; Based on interview with Human Resource Director review of personnel files; and Hiring packet with PREA questions. Review of personnel files and checks of criminal records being performed and five year background checks being redone. Reviewed candidate resume questionnaire; background release form; Disclosure & Consent. Reviewed Annual performance evaluation authorization form.

The Riverbend Correctional Facility does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor who may have contact with inmates, who—has engaged in sexual abuse in the facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above.

The Riverbend Correctional Facility considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

The Riverbend Correctional Facility performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates. All contractors 5 year re-check is tracked on an excel spreadsheet.

The Riverbend Correctional Facility conducts criminal background records checks annually on all security staff as required by the Georgia Department of Corrections prior to their annual firearms qualifications.

Standard number here 115.18 Upgrades to facilities and technology
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. C – 3 Based on interview of agency head and warden. Reviewed PREA meeting minutes requesting cameras. 10 new cameras ordered 1/14.

The Riverbend Correctional Facility considers how such technology may enhance the facility's ability to protect inmates from sexual abuse. There were a total of 416 cameras installed when the facility opened in 2012. They have added 10 cameras in 1/13 as identified by the security team.

Standard number here

115.21 evidence protocol and forensic medical exams

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. E. III. A 3 (b-d); Based on interview with PREA compliance manager.

Riverbend Correctional Facility follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

The Riverbend Correctional Facility offers all victims of sexual abuse access to forensic medical examinations at the Oconee Regional Medical Center, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs).

The Riverbend Correctional Facility provides victim advocate services through qualified staff members who have received appropriate training. They have trained an LPN, Mental Health Counselor and the Chaplain to perform these services, however have had no instances requiring the use of these services as of this audit. The facility has documented efforts to secure services from rape crisis centers, however there are no such services available in the county.

As requested by the victim, a qualified agency staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and are provide emotional support, crisis intervention, information, and referrals.

Standard

115.22 referrals of allegations for investigations

number here

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

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

Based on policy 5.1.2. E. III. A-1 a. 5.1.2. A. III. A-2; RCF 10.4 III. E. 1-5. Based on interview with agency head and investigative staff; reviewed investigations. Reviewed Office of Professional Responsibility – Referral of Staff Misconduct; Monthly PREA tracking log.

The Riverbend Correctional Facility ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

The Riverbend Correctional Facility has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The Riverbend Correctional Facility publishes the policy on the GEO website. The Riverbend Correctional Facility documents all such referrals. The in house investigator has the legal authority to pursue criminal charges. All investigations of inmate on inmate assaults are referred to the Georgia Department of Corrections once completed to determine if they are going to pursue criminal charges if they refer the case back to the facility the facility investigator can still file criminal charges if they deem appropriate. All staff on inmate charges is referred to Office of Professional Responsibility for a determination.

Standard number here

115.31 Employee training

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

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

Based on policy 5.1.2. A. III. F. 1. (a-f); RCF 10.22 A. 3 (a-j), A 5 & A 6. Based on interview with random staff and review of lesson plan In Service PREA Orientation, Training Curriculum; Training sign in sheet and staff acknowledgement statement.

The Riverbend Correctional Facility trains all employees who have contact with inmates on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;

- (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- (3) Inmates' right to be free from sexual abuse and sexual harassment;
- (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with inmates;
- (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The training is tailored to the gender of the inmates at The Riverbend Correctional Facility.

The Riverbend Correctional Facility documents, through employee signature that employees understand the training they have received.

Standard number here	115.32 Volunteer and contractors training
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. G. 1 (a-e) & H. 1 (a-f); RCF 10.22 A. 3 (a-j) & 4 (a-h) & A 6. Based on interview with volunteer and contractors. Lesson Plan; Volunteer roster; Volunteer/Contractor Orientation & Training Curriculum. Volunteer/Contractor Handbook; Volunteer/Contractor PREA Basic Training; training acknowledgement.

The Riverbend Correctional Facility ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the facility's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates. All volunteers and contractors who have contact with inmates are notified of the facility's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

The Riverbend Correctional Facility has documentation confirming that volunteers and contractors understand the training they have received.

Standard number here	115.33 Inmate education
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. E. 2 (a-j); RCF 10.22 A.1 & 2. Based on interview with random inmates and intake staff. PREA Orientation and Video signed acknowledgement; and Video script.

During the intake process, inmates receive information explaining The Riverbend Correctional Facility's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

Within 2 days of intake, The Riverbend Correctional Facility provides a comprehensive education to inmates both in person and through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.

The Riverbend Correctional Facility provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. There is documentation of inmate participation in these education sessions.

Standard number here 115.34 Specialized training: Investigators
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III F. 3 a-c; Based on interview with investigative staff. Review of PREA Specialized Investigation Training; Training Curriculum and Training certificates.

In addition to the general training provided to all employees The Riverbend Correctional Facility ensures that the in house investigator has received training in conducting such investigations in a confinement setting. The Riverbend Correctional Facility's investigator is a retired 30 year Bureau of Prisons Officer.

Specialized training include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The Riverbend Correctional Facility maintains

documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

Standard number here 115.35 Specialized training: Medical and mental health care

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

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

Based on policy 5.1.2. A. III. F. 2 (a-d); Training Acknowledgement signature page and Certificate of completion.

The Riverbend Correctional Facility ensures that all full and part-time medical and mental health care practitioners who work regularly in the facility has been trained in: how to detect and assess signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. There is documentation that medical and mental health practitioners have received the training.

Medical and mental health care practitioners also receive the training mandated for employees under 115.31 or for contractors and volunteers under § 115.32

Standard number here 115.41 Screening for risk of victimization and abusiveness
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- Exceeds Standard (substantially exceeds requirement of standard)
- X. Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. D-1 (a-g); RCF 10.22 B. 1 - 3 Based on interview with random inmates and intake staff responsible for screening. Only limited staff has access to the risk screening form only Medical, Mental Health and Warden as well as PREA Manager. All Risk Assessments are maintained in inmate files and are kept locked. Reviewed Transfer list/initial screening; 30 day PREA follow-up classification screening

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

Intake screening ordinarily takes place within a few hours of arrival at The Riverbend Correctional Facility.

Such assessments are conducted using an objective screening instrument.

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

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

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

Within 30 days from the inmate's arrival at The Riverbend Correctional Facility, the facility reassesses the inmate's risk of victimization or abusiveness based upon any additional, relevant information received since the intake screening.

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

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

The Riverbend Correctional Facility implements appropriate controls on the dissemination within the facility responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates. The risk screening is maintained in the custody file secured in the records department and only Classification and Case Managers have access to these records.

Standard number here 115.42 Use of screening information

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

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

Based on policy 5.1.2. A. III. D. 1 (c-d) 3 (a-c); RCF 10.22 B 3. (e-g) Based on interview with PREA compliance manager and staff responsible for risk screening. Reviewed Victim/Aggressor Classification Screening. Currently no transgender/intersex inmates housed at RCF.

The Riverbend Correctional Facility uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

The Riverbend Correctional Facility makes individualized determinations about how to ensure the safety of each inmate.

Placement and programming assignments for each transgender or intersex inmate is reassessed at least twice each year to review any threats to safety experienced by the inmate. A transgender or intersex inmate's own views with respect to his or her own safety are given serious consideration. Transgender and intersex inmates are given the opportunity to shower separately from other inmates.

The Riverbend Correctional Facility does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

**Standard
number here**

115.43 Protective custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. J. 1 (a-f); Based on interview with warden, staff who supervise segregated inmates.

Inmates at high risk for sexual victimization are not placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers.

Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If The Riverbend Correctional Facility restricts access to programs, privileges, education, or work opportunities, the facility documents, the opportunities that have been limited; the duration of the limitation; and the reasons for such limitations.

The Riverbend Correctional Facility assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment are not ordinarily exceed a period of 30 days.

If an involuntary segregated housing assignment is made The Riverbend Correctional Facility clearly documents the basis for the facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged.

Every 30 days, The Riverbend Correctional Facility affords each such inmate a review to determine whether there is a continuing need for separation from the general population.

Standard number here 115.51 Inmate reporting

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III K. 1 (a-c) Based on interviews with random staff and inmates. Inmates can dial *7732 from any inmate phone to report an incident.

The Riverbend Correctional Facility provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

The Riverbend Correctional Facility provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of The Riverbend Correctional Facility, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. The inmates can dial *7732 from any phone in the housing unit and contact the Georgia Department of Corrections hotline and RAINN (Rape, Abuse and Incest National Network) 1-800-656-4673.

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

The Riverbend Correctional Facility provides a method for staff to privately report sexual abuse and sexual harassment of inmates. Staff may report abuse to an 800 number with GEO's corporate office.

Standard number here 115.52 exhaustion of administrative remedies
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. K. 2 (a-d); GDOC II B 05-001 pg. 10 (8 a-c). Reviewed grievances and responses.

The Riverbend Correctional Facility does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.

The Riverbend Correctional Facility does not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

The Riverbend Correctional Facility ensures that an inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint. There have been no grievances filed relating to PREA.

The Riverbend Correctional Facility issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

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

The Riverbend Correctional Facility has established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, The Riverbend Correctional Facility immediately forwards the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action is taken, and provides an initial response within 48 hours, and issues a final agency decision within 5 calendar days. The initial response and final agency decision documents The Riverbend Correctional Facility's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

The Riverbend Correctional Facility may discipline an inmate for filing a grievance related to alleged sexual abuse only where The Riverbend Correctional Facility demonstrates that the inmate filed the grievance in bad faith.

Standard number here

115.53 Inmate access to outside confidential support services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. L -8 (a-b) Based on interview with random inmates and inmate who reported sexual assault. No outside Victim Advocate service available – several attempts made no local provider. Reviewed Sexual Assault Advocate Training provided to selected staff.

The Riverbend Correctional Facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse through RAINN (Rape, Abuse and Incest National Network) 1-800-656-4673. The calls and correspondence to these organizations are not monitored.

Standard number here 115.54 Third party reporting
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III K-3; GEO Website. PREA poster and reviewed Inmate Handbook.

The Riverbend Correctional Facility has a method to receive third-party reports of sexual abuse and sexual harassment and distributes publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate.

Standard number here 115.61 Staff and agency reporting duties
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. K. 4 (a-c); RCF 10.22 C. 1. (a-f); Ga. Code Ann 30-5.4 Against an Adult. Based on interviews with random staff; warden and medical/mental health staff. Reviewed Employee Handbook and Employee Acknowledgement.

The Riverbend Correctional Facility requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the facility; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Per Georgia Department of Corrections policy all medical and mental health practitioners are required to report sexual abuse and to inform inmates of their duty to report and the limitations of confidentiality.

Apart from reporting to designated supervisors or officials, staff does not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

The Riverbend Correctional Facility reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to The Riverbend Correctional Facility's designated investigator.

Standard number here 115.62 Agency protection duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. L. 1; RCF 10.22 pg. 5 (c) Based on interviews with random staff, and warden.

When The Riverbend Correctional Facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the inmate.

Standard number here 115.63 Reporting to other confinement facilities
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. L 5 (a-c). Based on interview with agency head and warden.

Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of The Riverbend Correctional Facility that received the allegation notifies the head of the facility where the alleged abuse occurred. Such notification is provided as soon as possible, after receiving the allegation and is documented.

Standard number here 115.64 Staff first responder duties

X. Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III L-2 (a-f); 5.1.2. E. III D 1-4; RCF 10.22 A. 3. (a-i). Based on interview with security staff who is first responders. Reviewed PREA Pocket Card. Based on Pocket card I find The Riverbend Correctional Facility exceeds in their ability to ensure staff respond to incidents correctly.

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

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

Standard number here 115.65 Coordinated response

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III A-4, L3; NENM P&P 12.000 A.4.; RCF 10.22 pg. 6 #4 (a-k). Based on interview with warden. Review of Incident checklist.

The Riverbend Correctional Facility has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

Standard number here 115.66 Preservation of ability to protect inmates from contact with abusers

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

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

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

Standard number here 115.67 Agency protection against retaliation
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- Exceeds Standard (substantially exceeds requirement of standard)
- X. Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. M 2 (a-f). Based on interview with agency head, warden, designated staff member responsible for monitoring retaliation; Reviewed Retaliation log for September, October and November, no cases exceeded 90 days.

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

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

For at least 90 days following a report of sexual abuse, The Riverbend Correctional Facility monitors the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and are acted on

promptly to remedy any such retaliation. Items The Riverbend Correctional Facility monitors inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The Riverbend Correctional Facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

In the case of inmates, such monitoring includes periodic status checks.

If any other individual who cooperates with an investigation expresses a fear of retaliation, The Riverbend Correctional Facility takes appropriate measures to protect that individual against retaliation.

Standard number here 115.68 Post allegation protective custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III L 6; Based on interview with warden. No inmate has been placed in involuntary segregation.

Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse is subject to the requirements of 115.43

Standard number here 115.71 Criminal and administrative agency investigation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. E. III B 1 (d) and (b) 2 (a-h); RCF 10.22 pg. 10 #6 (a-h). Based on interview with investigative staff. Review of investigation files.

The Riverbend Correctional Facility conducts allegations of sexual abuse and sexual harassment, promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

The Riverbend Correctional Facility uses investigators who have received special training in sexual abuse investigations pursuant to 115.34.

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

When the quality of evidence appears to support criminal prosecution, The Riverbend Correctional Facility conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. All criminal investigations go to Georgia Department of Corrections to determine if they want to prosecute, if they decline to prosecute the case it is referred back to the institutional investigator to determine if they want to proceed with prosecution.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. The facility does not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

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

Criminal investigations are documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

Substantiated allegations of misconduct that appears to be criminal are referred for prosecution.

The Riverbend Correctional Facility retains all written reports for as long as the alleged abuser is incarcerated or employed by The Riverbend Correctional Facility, plus five years.

The departure of the alleged abuser or victim from the employment or control of The Riverbend Correctional Facility does not provide a basis for terminating an investigation.

**Standard
number here**

115.72 Evidentiary standard for administrative investigation

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

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

Based on policy 5.1.2. E. III B 2 (d); Based on interview with investigative staff. Review of investigation files.

The Riverbend Correctional Facility imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

Standard number here 115.73 Reporting to inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2.E III F (a-c); Based on interview with warden; investigative staff. Reviewed Notification of Outcome of Allegation.

Following an investigation into an inmate's allegation that he suffered sexual abuse in the facility, The Riverbend Correctional Facility informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, The Riverbend Correctional Facility subsequently informs the inmate (unless The Riverbend Correctional Facility has determined that the allegation is unfounded) whenever the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at the facility; the staff member has been indicted on a charge related to sexual abuse within the facility; or the facility learns that the staff member has been convicted on a charge related to sexual abuse within The Riverbend Correctional Facility.

Following an inmate's allegation that he has been sexually abused by another inmate, The Riverbend Correctional Facility subsequently informs the alleged victim whenever they learn that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the alleged abuser has been convicted on a charge related to sexual abuse within The Riverbend Correctional Facility.

All such notifications or attempted notifications are documented.

An agency's obligation to report under this standard terminates if the inmate is released from The Riverbend Correctional Facility's custody.

Standard number here 115.76 Disciplinary sanctions for staff

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. E. III 3 G 1.(a,c,d); RCF 10 .22 A. 1. (a-b); Employee Handbook pg. 16. Reviewed case #12-0641 staff resigned under investigation.

Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

Termination is the presumptive disciplinary sanction for staff who has engaged in sexual abuse.

Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

Standard number here 115.77 Corrective action for contractors and volunteers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III G 3 (a); 5.1.2. E. III G 3 (a-f) Based on interview with warden. There have been no instances of volunteer/contractor abuse.

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

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

Standard number here 115.78 Disciplinary sanctions for inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. E. III G 2 (a-f); GDOC policy VG 34-0001 I. Inmate Disciplinary Code B-8; B-9; B-10. Based on interview with medical/mental health staff. Reviewed Disciplinary Sanctions and disciplinary reports.

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

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

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

The Riverbend Correctional Facility disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

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

The Riverbend Correctional Facility prohibits all sexual activity between inmates and may discipline inmates for such activity.

**Standard
number here**

115.81 Medical and Mental health screening; history of sexual abuse

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III D 2 (a-d); RCF 10.22 B. 1-3. Based on interview with staff responsible for risk screening and medical/mental health staff. Reviewed Sexual Risk Indicator Screening and Victim/Aggressor Classification Screening.

If the screening indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the

inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

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

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

Medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting.

**Standard
number here**

115.82 Access to emergency medical and mental health services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III L 7 (a-b); Based on interview with medical and mental health staff and inmates who reported sexual abuse. No instances of inmate victims of sexual abuse that required access to emergency medical treatment.

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

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

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

**Standard
number here**

115.83 Ongoing medical and mental health care for sexual abuse victims

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. . III M 1 (a-d); GDOC policy VG 55-0001 I. Based on interview with medical/mental health staff and inmates who reported sexual assault. Reviewed Mental Health treatment examples

The Riverbend Correctional Facility offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in the facility.

The evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.

The Riverbend Correctional Facility provides such victims with medical and mental health services consistent with the community level of care.

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

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Standard number here

115.86 Sexual abuse incident reviews

X Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. M. 3 (a-c); Based on interview with warden, PREA compliance manager; incident review team and reviewed After Action Report. Excellent PREA after action review form that addresses all elements of the standard. Reviewed SART meeting minutes

The Riverbend Correctional Facility conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This review ordinarily occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; and they examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

Standard number here 115.87 Data collection
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. N. 1. (a-d), N. 3. (c) Reviewed PREA Incident Report Survey; PREA Incident tracking log.

The Riverbend Correctional Facility collects accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions.

The Riverbend Correctional Facility aggregates the incident-based sexual abuse data at least annually.

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

The Riverbend Correctional Facility maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Upon request, The Riverbend Correctional Facility provides all such data from the previous calendar year to the Department of Justice no later than June 30.

Standard number here 115.88 Data review for corrective action
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. N 2.(a-d). Based on interview with PREA coordinator and

The Riverbend Correctional Facility reviews data collected and aggregated in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by:

- (1) Identifying problem areas;
- (2) Taking corrective action on an ongoing basis; and
- (3) Preparing an annual report of its findings and corrective actions.

Such report includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of The Riverbend Correctional Facility's progress in addressing sexual abuse.

The Riverbend Correctional Facility's report is approved by The Riverbend Correctional Facility head and is currently not made available to the public through the Georgia Department of Corrections Website. During the Corrective Action period the GEO Group placed the aggregated data for 2012 and 2013 on its website.

The Riverbend Correctional Facility redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but must indicate the nature of the material redacted.

Standard number here 115.89 Data storage, publication and destruction
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III N. 3.

The Riverbend Correctional Facility ensures that data collected pursuant to § 115.87 are securely retained.

The Riverbend Correctional Facility currently does not make all aggregated sexual abuse data readily available to the public at least annually through the Georgia Department of Corrections website. During the Corrective Action period the GEO Group placed the aggregated data for 2012 and 2013 on its website.

Before making aggregated sexual abuse data publicly available, The Riverbend Correctional Facility removes all personal identifiers.

The Riverbend Correctional Facility maintains sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires.

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 Riverbend Correctional Facility under review.

Katherine Brown

December 19, 2014

Auditor Signature

Date