

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of facility:		Val Verde Correctional Facility	
Physical address:		253 FM 2523 Hamilton Lane Del Rio, Tx 78840	
Date report submitted:		December 19, 2014	
Auditor Information		Katherine Brown	
Address:		12121 Little Road Suite 286 Hudson, Florida 34667	
Email:		Kbrown2828@yahoo.com	
Telephone number:		727-470-4123	
Date of facility visit:		July 15-17, 2014	
Facility Information			
Facility mailing address:		Same	
Telephone number:			
Val Verde 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:		Rose Sanchez	Title: Compliance Manager
Email address:		rosanchez@geogroup.com	Telephone number: 830-778-0096 x 214
Agency Information			
Name of agency:		GEO Group Inc.	
Governing authority or parent agency: (if applicable)			
Physical address:		One Park Place, Suite 700 621 NW 53 rd St Boca Raton, Florida 33487	
Mailing address:		same	
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
Email address: pmoreland@geogroup.com		Telephone number:	561-999-5827

AUDIT FINDINGS

NARRATIVE:

The audit of Val Verde Correctional Facility was conducted on July 15-17, 2014 by Katherine Brown, Certified PREA auditor. The areas toured were a total of 27 housing units. There are 31 general population units and four administrative detention/segregation unit. Each of the general population units have 48 beds with the exception of one 64 bed open bay direct supervision female housing unit. Plus the kitchen, laundry, programs area, and medical. There are 170 beds at the Val Verde County Jail that is run by the GEO Group and is adjacent to the main jail attached by a covered walkway. The County Jail has 10 housing units that are 24 beds each plus 9 segregation cells.

An entrance meeting was held with facility staff. The following people were in attendance: Warden Brett Bement; Deputy Warden Christopher Martinez; Rose Sanchez, PREA CM; Randy Blanton, CR Director Contract Compliance; Linda Castillo, HR Specialist; Tamara Rattay, Health Services Administrator; Zenon De Los Santos, Major; Meagan Hodges, BSCC PREA CM; Tony Carochi, Asst. Director of Operations.

Following the entrance meeting I toured the Val Verde Correctional Facility from 08:15-11:30. On the tour with me was, Warden Brett Bement; D/W Martinez; Major De Los Santos; Rose Sanchez; Randy Blanton; Tony Carochi; Meagan Hodges; Mr. Gerry Maldonado, CR Director of Operations; Steven Fernandez, USM Agent; Matthew Minjares, USM Agent; Lee De La Fuentes, USM Jail Inspector..

The night before the audit I asked for an alpha listing of all inmates housed at Val Verde Correctional Facility and randomly selected one inmate from each housing unit as well as any inmates who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment inmates; transgender/intersex inmates. I interviewed several limited English speaking inmate. I also asked for a shift roster and randomly selected staff to interview.

There were 27 sexual assault/harassment allegation cases, all relatively recent (within the past year) 1 was substantiated; 6 unsubstantiated and 20 unfounded. There were no actual sexual assault.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Val Verde Correctional Facility is located at 253 FM 2523 Hamilton Lane Del Rio, Texas 78840. The Val Verde Correctional Facility contracts with the United States Marshal Service and the Office of Federal Detention Trustee to house pre-trial inmates. The average length of stay is 180 days. The level of security for Val Verde Correctional Facility is medium. The state of the art 62,456 square foot complex occupies approximately 15 acres. In January 2001, GEO activated the 688 bed expansion of the Val Verde County Jail. In September 2007, a second expansion of 576 beds was completed to meet the increasing needs of the United States Service, Border Patrol and Immigration and Customs Enforcement.

Val Verde Correctional Facility consists of eight housing units. Six of these housing units have four dorms (2 tiers) with twenty four 2 man cells. The first cell in each dorm has been designed and constructed to accommodate any handicapped inmates. The dorms are equipped with two recreation yards immediately adjacent to the dorms. Val Verde Correctional Facility has one open bay dorm style housing unit which houses 64 inmates and one segregation housing unit which has 29 cells. Each housing unit is equipped with a control picket overseeing all the dorms, a library/multi-purpose room, barber shop and medical triage room. The overall design of Val Verde Correctional Facility requires very little inmate movement.

SUMMARY OF AUDIT FINDINGS:

The results indicate:

Number of standards exceeded: 6

Number of standards met: 37

Number of standards not met: 0

Number of standards not applicable:

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. VVCF 1400.03 IV A. 1.; B.1. a-g; B-2 a-f Based on interview with PREA Coordinator and PREA compliance manager. Review of Organizational Chart

Val Verde Correctional Facility has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Val Verde Correctional 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 GEO Group operates more than one facility; each facility has designated a PREA compliance manager with sufficient time and authority to coordinate Val Verde Correctional 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). VVCF 1400.03 IV A.5 a-b Based on interview with agency's contract compliance manager. Reviewed US Marshal's contract 2/25/13.

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

Standard number here 115.13 Supervision and monitoring

- 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. NENM P&P 12.000 C. 1. (a-g); VVCF 1400.03 IV C. 2 a-f Post Order 22 II J&K. Based on interview with Warden: PREA Compliance Manager and PREA Coordinator. Reviewed: staffing plan; Shift Roster; PREA annual facility assessment 10/14/13; VVCF Housing Activity Log.

Val Verde 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.

In circumstances where the staffing plan was not complied with, Val Verde Correctional Facility documented and justified all deviations from the plan on the Daily Supervisor Security check log.

Val Verde Correctional Facility completes the PREA annual facility assessment form, 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
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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. J 2; VVCF 1400.03 IV. I. 2

Val Verde Correctional Facility occasionally receives youthful inmates on pre-trial status pending release upon securing bond. Juveniles are housed in 6 A E. At the time of the audit no juveniles were in custody.

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; VVCF 1400.03 IV H. 1-8 and review of Lesson Plan Cross Gender Viewing & Searches and In Service Lesson Plan

Val Verde 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.

Val Verde 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.

Val Verde 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.

Val Verde 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)
- 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) VVCF 1400.03 IV D 1 a-c. Reviewed Language Line Services, Inc. 2/1/11; Training Curriculum (I/M with Disabilities); Inmate Handbook English/Spanish; TTY phone. Based on random inmate and staff interviews and interview with limited English speaking inmates.

Val Verde 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 Val Verde Correctional Facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Case Managers will read the information to the inmates to ensure they understand the information being provided.

Val Verde 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.

Standard number here 115.17 Hiring and promotion decisions

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); VCF 1400.03 IV C. 3 a-d. 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 Personnel Action form with Disclosure; Employee Action form; Initial & Annual Background Checks.

Val Verde 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 any criminal justice facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above.

Val Verde 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.

Val Verde Correctional Facility performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates performs annual records check of current employees and volunteers/contractors who may have contact with inmates.

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

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. C – 3; VCCF 1400.03 IV C-4 Based on interview of agency head and warden

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Val Verde Correctional Facility considers how such technology may enhance Val Verde Correctional Facility’s ability to protect inmates from sexual abuse. There have been no substantial expansions or modifications to existing facilities.

Standard number here 115.21 evidence protocol and forensic medical exams

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

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

Based on policy 5.1.2. E. III. A 3 (b-d); Val Verde Sheriff Office SOP pg. 25 & 48 JJ. 1.4. Based on interview with PREA compliance manager. Reviewed Val Verde County Crime Victim Advocate; MOU Val Verde County Domestic Violence Program; Val Verde Regional Hospital conducts SANE/SAFE exams.

To the extent Val Verde Correctional Facility is responsible for investigating allegations of sexual abuse; Val Verde Correctional Facility follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions

Val Verde Correctional Facility offers all victims of sexual abuse access to forensic medical examinations at Val Verde Regional Hospital, without financial cost, where evidentiary or medically appropriate. Such examinations are be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible.

Val Verde Correctional Facility makes available to the victim a victim advocate from the Val Verde County Crime Victim Advocate.

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

The Val Verde Sheriff’s Office conducts all criminal investigations, Val Verde Correctional Facility requires the Val Verde Sheriff’s Office to follow the requirements listed above.

Standard number here 115.22 referrals of allegations for investigations
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- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. E. III. A-1 a. 5.1.2. A. III. A-2; VVCF 1400.03 A. 2. a-b. Reviewed Investigation with referral; Monthly tracking log; GEO website and IGA Criminal Activity. Based on interview with agency head and investigative staff; reviewed investigations.

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

Val Verde 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. Val Verde Correctional Facility publishes such policy on its website. Val Verde Correctional Facility documents all such referrals.

The Val Verde Sheriff's Office has a policy in place that describes their responsibilities in conducting investigations at Val Verde Correctional Facility.

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); VVCF 1400.03 IV. E. 1. b-f. Reviewed PREA Curriculum; Training Attendance Rosters; Signed acknowledgements. Based on interview with random staff.

Val Verde 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 Val Verde Correctional Facility. The employees receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa.

Val Verde Correctional Facility documents, through employee signature, those employees understand the training they have received.

Standard number here 115.32 Volunteer and contractors training

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); VVCF 1400.03 IV F.1. b-d; G. 1. b-d. Based on interview with volunteer and contractors. PREA Curriculum (Volunteer/Contractors) Volunteer List with signed acknowledgements; contract list with signed acknowledgements.

Val Verde Correctional Facility ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Val Verde Correctional 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, but all volunteers and contractors who have contact with inmates are notified of Val Verde Correctional Facility's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

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

Standard number here 115.33 Inmate education

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); VVCF 1400.03 D. 2. a-g. Based on interview with random inmates and intake staff. Review of Inmate Handbook and Acknowledgement of Rights & Procedures.

During the intake process, inmates receive information explaining Val Verde 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 30 days of intake, Val Verde Correctional Facility provides a comprehensive education to inmates in person by the case managers 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.

Val Verde 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; VCCF 1400.03 IV. E. 3 a – b. Based on interview with investigative staff. Review of Investigators Training Curriculum and Specialized Training certificates, Facility Investigator's Signed Acknowledgement (6). Val Verde Sheriff Office Specialized Training Certificates (24)

In addition to the general training provided to all employees Val Verde Correctional Facility ensures that the in house investigators have received training in conducting investigations in confinement settings.

Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Val Verde Correctional Facility maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

All of the investigators with the Val Verde Sheriff Office received the specialized training in conducting sexual abuse investigations and certificates were provided.

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

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

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

Based on policy 5.1.2. A. III. F. 2 (a-d); VCCF 1400.03 IV. E. 2.a – d. Reviewed specialized Training Curriculum (Medical & Mental Health Cate Lesson Plan); PREA Specialized Medical/Mental Health Training Acknowledgement.

Val Verde Correctional Facility ensures that all full and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

Val Verde Correctional Facility maintains documentation that medical and mental health practitioners have received the training. Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers.

Standard number here	115.41 Screening for risk of victimization and abusiveness
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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. D-1 (a-g); VCCF 1400.03 IV. C. 1. a-h. Reviewed PREA Initial & Reassessment; PREA Risk Assessment; PREA Vulnerability Reassessment Questionnaire. Based on interview with random inmates and intake staff responsible for screening. Only limited staff have 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.

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 screenings take place within hours of arrival at Val Verde Correctional Facility.

Val Verde Correctional Facility uses 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 Val Verde Correctional Facility, in assessing inmates for risk of being sexually abusive.

Within 30 days from the inmate's arrival at Val Verde Correctional Facility, Val Verde Correctional Facility reassesses each inmate and reviews any additional, relevant information received by Val Verde Correctional Facility 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 disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked.

Val Verde Correctional Facility implements appropriate controls on the dissemination within Val Verde Correctional Facility of 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.

I find Val Verde Correctional Facility exceeds in this standard due to every inmate is reassessed within 30 days.

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); VCCF 1400.03 IV. C. 3 a-e. Based on interview with PREA compliance manager and staff responsible for risk screening. Reviewed PREA Risk Assessment. VCCF has not received any transgender/intersex inmates.

Val Verde 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.

Val Verde 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 be given serious consideration.

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

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

At the time of the audit there were no LGTBI inmates.

Standard number here 115.43 Protective custody

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

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

Based on policy 5.1.2. A. III. J. 1 (a-f); VCCF 1400.03 IV I 1. a-f. Based on interview with warden, staff who supervise segregated inmates. Reviewed At Risk Tracking List; Available Alternatives Assessment; PREA Vulnerability Reassessment Questionnaire; Segregation Activity Log.

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 Val Verde Correctional Facility restricts access to programs, privileges, education, or work opportunities, Val Verde

Correctional Facility documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.

Val Verde 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 involuntary segregated housing assignment is made Val Verde Correctional Facility clearly documents the basis for Val Verde Correctional Facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Every 30 days a review is performed to determine whether there is a continuing need for separation from the general population.

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); VCCF 1400.03 IV. J. 1 a-e. Reviewed contract with US Marshals; Inmate Handbook. Based on interviews with random staff and inmates.

Val Verde 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. O.I.G. 1-800-869-4499.

Val Verde 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 Val Verde 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.

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

Val Verde Correctional Facility provides a method for staff to privately report sexual abuse and sexual harassment of inmates. www.reportline.web.com/geogroup

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); VCCF 1400.03 IV. J. 2. a.1-5; 2. a.2,6,7; 2. b.1-3 .
Reviewed Inmate Handbook

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

Val Verde 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.

Val Verde 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.

Val Verde 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, attorneys, and outside advocates, 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.

Val Verde Correctional Facility has established procedures for the filing of an emergency grievance when the inmate is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, Val Verde 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 Val Verde 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.

Val Verde Correctional Facility may discipline an inmate for filing a grievance related to alleged sexual abuse only where Val Verde 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); VVCF 1400.03 IV. K. 8. A, b, & d. Reviewed Inmate Handbook, MOU between GEO & BCFS Health & Human Services 7-13-13; Val Verde Crime Victims Advocate job description. Based on interview with random inmates.

Val Verde Correctional Facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. Val Verde Correctional Facility enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.

Val Verde Correctional Facility informs inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

Val Verde Correctional Facility maintains memoranda of understanding between GEO and BCFS Health & Human Services 7-13-13.

Standard number here 115.54 Third party reporting
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III K-3; VVCF 1400.03 IV. J. 3. GEO Website.

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

Standard number here 115.61 Staff and agency reporting duties
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. K. 4 (a-c); VVCF 1400.03 IV. J. 4. A-e. Based on interviews with random staff; warden and medical/mental health staff. Reviewed Specialized Medical & Mental Health PREA training.

Val Verde 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 Val Verde Correctional 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.

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

If the alleged victim is under the age of 18 or considered a vulnerable adult under State VTCA Penal Code 22.04, Val Verde Correctional Facility reports the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Val Verde Correctional Facility reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Val Verde Correctional Facility's designated investigators.

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 VVCF 1400.03 IV. K. 1. a. Based on interviews with random staff, and warden as well as reviewed incident reports. Facility has not had an incident of a detainee being in substantial risk.

When Val Verde Correctional Facility learns that an inmate is subject to a substantiated 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). VVCF 1400.03 IV. K. 5. a-c. Based on interview with agency head and warden. Reviewed Letter UM#03768380.

Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Warden of Val Verde Correctional Facility that received the allegation notifies the head of the agency or appropriate office of the agency where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented.

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; VVCF 1400.03 IV. K. 3. a-f. Based on interview with security staff who are first responders, random staff and inmates who reported sexual abuse and review of Incident Reports

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

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

Based on the Pocket Card I find Val Verde Correctional Facility exceeds in their ability to ensure staff respond to incidents accordingly.

Standard number here 115.65 Coordinated response

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 A-4, L3; VVCF 1400.03 IV. A. 4. Based on interview with warden. Reviewed Coordinated Response Plan; PREA Incident Checklist

Val Verde 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.

Based on the Coordinated Response Action plan I find they exceed in this standard.

Standard number here	115.66 Preservation of ability to protect inmates from contact with abusers
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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. A. 3 (b); 5.1.2. E. III. A 2 (a); VVCF 1400.03 IV. A. 3. b Based on interview with agency head. Reviewed Collective Bargaining Agreement GEO Group & International Union Security, Police & Fire Professionals of American Nov. 26, 2012- Nov. 26, 2015.

Neither Val Verde Correctional Facility nor any other governmental entity responsible for collective bargaining on Val Verde Correctional Facility’s behalf entered into or renewed any collective bargaining agreement or other agreement that limits Val Verde Correctional Facility’s ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.

Standard number here	115.67 Agency protection against retaliation
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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. M 2 (a-f). VVCF 1400.03 IV. L. 2. a-h. Based on interview with agency head, warden, and designated staff member responsible for monitoring retaliation. Reviewed Retaliation Log.

Val Verde 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 are designate which staff members or departments are charged with monitoring retaliation.

Val Verde 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, Val Verde 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 act promptly to remedy any such retaliation. There are periodic status checks performed. Items Val Verde Correctional Facility monitors include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Val Verde Correctional Facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

If any other individual who cooperates with an investigation expresses a fear of retaliation, Val Verde 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)
- 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; VVCF 1400.03 IV. K. 6 & I. 1 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 receive all the same rights and privileges as general population inmates.

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); SOP #SOP #41 Crime Scene Procedure. Based on interview with investigative staff and interview with Val Verde Sheriff Office Investigator. Review of investigation files. Reviewed copy of Intergovernmental Agreement.

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

Where sexual abuse is alleged, Val Verde Correctional Facility uses investigators who have received special training in sexual abuse investigations.

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

When the quality of evidence appears to support criminal prosecution, Val Verde Correctional Facility conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal 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. No agency requires 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 conduct that appears to be criminal are referred for prosecution to Val Verde Sheriff's Office.

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

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

The Val Verde Correctional Facility cooperates with the Val Verde Sheriff's Office investigators and remains informed about the progress of the 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); VVCF 1400.03 IV. N. 2. Based on interview with investigative staff. Review of investigation files.

Val Verde 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)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2.E III F (a-c); Reviewed VVCF 1400.03 IV. L. 4. a-g. Based on interview with warden; investigative staff. Reviewed Notification of Outcome of Allegation.

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

If Val Verde Correctional Facility did not conduct the investigation, it requests the relevant information from the Val Verde Sheriff's Office in order to inform the inmate.

Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, Val Verde Correctional Facility subsequently informs the inmate (unless Val Verde 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 Val Verde Correctional Facility; Val Verde Correctional Facility learns that the staff member has been indicted on a charge related to sexual abuse within Val Verde Correctional Facility; or Val Verde Correctional Facility learns that the staff member has been convicted on a charge related to sexual abuse within Val Verde Correctional Facility.

Following an inmate's allegation that they had been sexually abused by another inmate, Val Verde Correctional Facility subsequently informs the alleged victim whenever Val Verde

Correctional Facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within Val Verde Correctional Facility; or Val Verde Correctional Facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within Val Verde Correctional Facility.

All such notifications or attempted notifications are documented.

An agency's obligation to report under this standard are terminate if the inmate is released from Val Verde 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); VVCF 1400.03 IV M. 1 a – c. Employee Handbook pg. 16.

Staff are 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 have 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)
- 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) VVCF 1400.03 IV. F. 3 a-b; G.3. a-b. Based on interview with warden.

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.

Val Verde 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)
- 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); VVCF 1400.03 IV. M. 2. a-d. Based on interview with medical/mental health staff. Reviewed Offense Report/Disposition UM 18278380; Inmate Handbook.

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 or her* behavior when determining what type of sanction, if any, should be imposed.

Val Verde 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 are not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Val Verde 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)
- 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); VVCF 1400.03 IV. C. 2. b-c. Based on interview with staff responsible for risk screening and medical/mental health staff. Reviewed Sexual Risk Indicator Screening. Reviewed PREA Risk Assessment; Follow Up Meeting Progress Notes.

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

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

Based on 5.1.2. A. III L 7 (a-b); VVCF 1400.03 IV. K. 7. a-b. Based on interview with medical and mental health staff and inmates who reported sexual abuse.

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. Inmates are transported to Val Verde Regional Medical Center.

If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and are immediately notify the appropriate medical and mental health practitioners.

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)
- 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); VVCF 1400.03 IV. L. 1. a-e. Based on interview with medical/mental health staff and inmates who reported sexual assault.

Val Verde Correctional Facility offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

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

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

Inmate victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

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

- 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); VVCF 1400.03 IV. L. 3. a-c. Based on interview with warden, PREA compliance manager; incident review team and reviewed After Action Report, excellent After Action Report. Val Verde Correctional Facility conducts an IRT for all cases Substantiated, Unsubstantial and Unfounded cases.

Val Verde 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 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 Val Verde Correctional Facility; and they examine the area in Val Verde Correctional 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

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

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

Based on policy 5.1.2. A. III. N. 1. (a-d), N. 3. (c) VVCF 1400.03 IV. O. 1. a-d. Reviewed Incident Report Survey; Monthly PREA Incident Tracking Log.

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

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

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

Val Verde Correctional Facility obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.

Upon request, Val Verde 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)

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). VVCF 1400.03 IV. O. 2. a-c. Based on interview with PREA coordinator and

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

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

Val Verde Correctional Facility's report is approved by Val Verde Correctional Facility head and made readily available to the public through its website. Currently the US Marshal Service does not have the report posted on the website. During the Corrective Action period the GEO Group placed the aggregated data for 2012 and 2013 on its website.

Standard number here 115.89 Data storage, publication and destruction
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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 N. 3. VVCF 1400.03 IV. O. 3 a-b.

Val Verde Correctional Facility makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website. Currently the US Marshal Service does not have the report posted on their website. During the Corrective Action period the GEO Group placed the aggregated data for 2012 and 2013 on its website.

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

AUDITOR CERTIFICATION:

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

Katherine Brown

December 19, 2014

Auditor Signature

Date