

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of facility:		Western Region Detention Facility	
Physical address:		220 West C Street, San Diego, CA 92101	
Date report submitted:		December 29, 2014 (Final Report)	
Auditor Information		Cathy Slack	
Address:	P.O. Box 278 Florence, CO 81226		
Email:	casconsulting@outlook.com		
Telephone number:	719-429-5158		
Date of facility visit:		July 7-9, 2014	
Facility Information			
Facility mailing address: <i>(if different from above)</i>			
Telephone number:			
The facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input checked="" type="checkbox"/> Federal
	<input checked="" type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
Name of PREA Compliance Manager:		Nicole Allen	Title: Programs Director
Email address:		niallen@geogropup.com	Telephone number: 619-232-9221
Agency Information			
Name of agency:		The GEO Group, Inc.	
Governing authority or parent agency: <i>(if applicable)</i>			
Physical address:		One Park Place, Suite 700, 621 Northwest 53 rd Street, Boca Raton, Florida 33487	
Mailing address: <i>(if different from above)</i>			
Telephone number:		561-999-5827	
Agency Chief Executive Officer			
Name:	George C. Zoley	Title:	Chairman of the Board, CEO and Founder

Email address:	gzoley@geogroup.com	Telephone number:	561-893-0101
Agency-Wide PREA Coordinator			
Name:	Phebia L. Moreland	Title:	Director, Contract Compliance, PREA Coordinator
Email address:	pmoreland@geogroup.com	Telephone number:	561-999-5827

AUDIT FINDINGS

NARRATIVE:

The audit of Western Region Detention Facility was conducted on July 7-9, 2014 by Cathy Slack, Certified PREA auditor. At Approximately 8:00 a.m., an entrance meeting was held with GEO staff and Western Region Detention Facility staff. The following were in attendance from the GEO Corporate Office: Phebia Moreland, Director, Contract Compliance PREA Coordinator. The following staff were in attendance from the Western Region Detention Facility: Eric Noonan, Warden; Christopher Carney, Chief of Security; Sean Desmond, Intelligence Officer; Christopher St. Jean, AFA Finance; Tiffany Carney, Contract Compliance Manager and Nicole Allen PREA Compliance Manager.

All areas of the facility were toured on the first day from 8:15 a.m. to 10:00 a.m. where a total of 6 floors of housing units were included in the tour. The tour consisted of the following:

- 8th Floor:** Recreation (Indoor/Outdoor); Chapel; Library; Staff Office
- 7th Floor:** Detainee Housing; Offices (Correctional Counselors/Detainee Records); Staff Dining Room; Kitchen
- 6th Floor:** Detainee Housing; Medical
- 5th Floor:** Detainee Housing
- 4th Floor:** Detainee Housing
- 3rd Floor:** Detainee Housing (Females)
- 2nd Floor & Annex-** Detainee Housing, Barber Shop
- 1st Floor Main:** Administrative Offices (Warden, Deputy Warden, Executive Secretary, Business, Human Resources, Conference Room, Armory, Training Room-
- 1st Floor:** Intake, Booking, Holding cells, Temporary Housing

The night before the audit I asked for an alpha listing of all detainees housed at the facility and randomly selected one detainee from each housing unit as well as any detainees who were limited English Speaking or disabled. There were no transgender and intersex detainees to interview. Female detainees were selected to be interviewed as well. I interviewed 9 detainees for random interviews and 4 Disabled and Limited English Proficient detainees and 1 LGBT detainee. There were 8 random staff interviews conducted from all three shifts. All specialized staff were interviewed.

There were 25 sexual abuse/sexual harassment allegations reported with the past 12 months. Of those allegations, 17 were unsubstantiated and 8 substantiated. There were 3 allegations against a staff member for sexual abuse, 2 unsubstantiated and 1 unfounded. There was 1 grievance that alleged sexual abuse in the past 12 months. There was one forensic medical exam conducted during the past 12 months performed by SANES/SAFEs.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Western Region Detention Facility (WRDF) is physically located at 220 West "C" Street, San Diego, California in the heart of the business district. The facility is operated by GEO Corrections. This facility

provides detention services and related operations deemed necessary for the protection of society, the health and custody of the inmates and the health and safety of staff.

The building was originally constructed in 1957 and was used and operated by the County of San Diego's Sheriff's Department. It is attached to the County's Superior Courts and the new County Jail. The building became available in 1998 after the completion of a new County Jail facility. The Western Region Detention Facility received their first detainees in July 2000. The Mission of the Western Region Detention Facility is to confine offenders in a safe, humane, and secure environment; to provide positive self-improvement opportunities for staff and detainees; and to establish and maintain a safe, supportive workplace for all employees.

The WRDF is an eight story detention facility with 760 beds. The U.S. Marshals Services (USMS) contracts exclusively with GEO Corrections for use of the facility to hold Federal pretrial offenders. The USMS contract is for 708 beds, although the population is often below and sometimes above that number. The inmate population is quartered in 37 housing areas. The additional beds offer the ability to properly classify and house different elements of the inmate population. Below is a breakdown of the living units per floor:

1st floor = 5 units
2nd floor= 6 units
2nd Annex= 4 units
3rd floor= 6 units
4th floor= 6 units
5th floor =4 main + 2 segregation units
6th floor= 3 units
7th floor - 2 units

A closer description of the layout of the floors is as follows. The basement houses the mailroom, laundry, maintenance shop, inmate property, dry food storage, and a general warehouse. There are also locker rooms and showers for the staff. Because there is insufficient space for a staff weight or workout room GEO has established a deal with 24-Hour fitness to compensate in the area of physical fitness.

The first floor is primarily dedicated to administrative offices, a conference room, and the intake area. Adjacent to intake is a covered, secure vehicle sally port. There is also a delivery dock on this level. The second floor is housing for general population male inmates. There is also a barber shop and shoe shine area. The third floor is entirely female housing. Fourth floor houses general population males. Fifth floor houses not only general population males but also includes segregation cells for protective custody inmates. The sixth floor is divided between male general population inmates, medical, mental health and geriatric inmates, and the medical clinic which includes negative air flow cells and infirmary beds.

The seventh floor houses offices for program counselors, records, and a staff lounge/break room and the kitchen. The eighth floor is devoted to both indoor and outdoor recreation as well as the reading and law libraries, and the Chapel which seats 40 inmates.

WRDF shifts for **Correctional staff shifts** are: The times are 0600-1430; 1400-2230; 2200-0630.
WRDF shifts for **Nursing staff** shifts are: 0700-1530; 1500-2330; 2300-0730.
WRDF shifts for **Programs staff** shifts are: 0800-1630.

Exit Briefing:

The exit briefing was held July 9, 2014 at 3:00 p.m. in the Conference Room with the following GEO Corporate staff: Phebia Moreland, PREA Coordinator; Western Region Staff Cynthia Armant; WR Director of Compliance and Dawn Zobel, Assistant Director of Operations. The following WRDF staff

were also in attendance: Eric Noonan, Warden; Nathan Allen, Deputy Warden; Nicole Allen, PREA Compliance Manager; Christopher Carney, Chief of Security; Sean Desmond, Intelligence Officer and Tiffany Carney, Contract Compliance Manager.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 6

Number of standards met: 36

Number of standards not met: 0

Non-applicable: 1

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

WRDF Organizational Chart indicated the PREA Compliance Manager is under the direct supervision of the Warden. The organizational chart indicates the PREA Compliance Manager reports to the Warden/GEO PREA Coordinator.

PREA posters are available in English and Spanish. Detainee Handbook is in English and Spanish. Orientation video is in English and Spanish. Both the video and handbook are available in English and Spanish. There are PREA posters located on each level of the facility both in English and Spanish. The PREA Compliance Manager meets with the detainees weekly in the housing units to ensure the awareness of PREA and the zero Tolerance Policy.

Verified by staff interviews.

§115.12 - Contracting with other entities for the confinement of inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/13 addressed this standard. The contracts that require WRDF to monitor PREA standards have been updated. The contracts are updated with the U.S. Marshal Service to include PREA language and the Western Region Quality Assurance Report office of Federal Detention Trustee dated September 23-25, 2013 which also includes pertinent PREA information.

§115.13 – Supervision and Monitoring

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 300-06 Position Control and Changing Authorized Staffing supersedes 3/14/13 addressed this standard. WRDF/SD Policy 900.15 Facility Inspection dated 8/15/13 addressed this standard.

The **PREA Annual Assessment** dated November 20, 2013 stating some PREA concerns in **section # (4)** During a PREA investigation, the need for video monitoring in two inmate housing areas (7th floor dorms A & B) was determined. Cameras were installed in the identified areas and the issue has since been rectified.

In **section # (5)** four areas were recently identified as having spots that are not being captioned on video surveillance. On March 17, 2014 the Fire Safety staff member wrote a memo indicating that cameras have been installed on the 2nd floor, A, B, E and F. Also cameras were installed on 7th Floor A & B. Also, DVR's had also been installed on 2nd and 7th floor and are accessible to the server. The newly installed cameras are able to monitor on a 24/7 basis.

In **section # (10)** the PREA Annual Assessment section # (10) There has been three cases of sexual abuse allegations for the year; all have been unsubstantiated.

There are vacant positions at WRDF; however, the facility continues to adhere to the staffing plan outlined in the contract with the United States Marshals Service. During these months when there are vacancies, overtime and call backs are used to ensure positions are filled and staffing levels adhered to. There have been no findings of inadequacy by judicial, federal investigative agencies and or any internal or external oversight bodies. Any deviations to the staffing plan are documented and justified in writing. The PREA Compliance Manager is involved in the staffing meetings in regards to PREA. There are approximately 180 cameras throughout the facility utilized for video monitoring.

Staff and detainee interviews confirmed that unannounced rounds are being conducted.

§115.14 – Youthful Inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

N/A no youthful offenders.

§115.15 – Limits to Cross- Gender Viewing and Searches

XX Exceeds Standard (substantially exceeds requirement of standard)

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

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 900-08 Searches of Detainees and Facility dated 4/30/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

- (a) Cross gender pat down searches are prohibited except in exigent circumstances. To date there has not been any occurrences of cross gender viewing (strip searches, pat searches or body cavity searches) conducted on detainees of this facility.
- (d) Portable Privacy screens were developed and used throughout the facility allowing the inmates to use the toilets which have no walls for privacy. In other parts of the facility there are temporary curtains that can be used when a detainee is using the toilet. There are shower curtains which allow the detainees to shower without being viewed by staff.
- (f) There is a 4 hour training GEO 131 PREA 2013 curriculum dated developed 2/14/13 and a 2 hour training GEO 293 PREA In-Service Training developed 10/21/13. There continues to be ongoing refresher training in the area of Transgender or intersex detainee searches in shift briefings. There is also a brochure which is provided to staff in regards to searching of transgender detainees. The brochure indicates transgender detainees are able to shower separately from other detainees at their request.

This standard was verified by staff and detainee interviews and observation of the privacy screens. Due to the continued ongoing training and ongoing efforts of awareness with the brochures to assist staff in regards to transgender and intersex detainees this standard substantially exceeds requirement of standard.

§115.16 – Inmates with Disabilities and Inmates who are Limited English Proficient

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

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

- (a) All detainees receive information which addressed Sexual Abuse and Sexual Harassment during orientation which is communicated orally and in writing in English and Spanish. The Dayroom PREA postings are both in English and Spanish. Orientation is provided in English and Spanish and the counselor will read the information as needed or requested. The PREA Orientation video is in English and Spanish and there are separate NIC PREA videos for female and male detainees. There is an orientation handout which is both in English and Spanish. The Detainee Handbook dated 2013 is also in English and Spanish.

There is a *333 (confidential hotline) phone number of the Office of the Inspector General where detainees can call free of charge. There are **TTY phones** available for the detainee population. Counselors are also available to read at the detainee's request or will enlarge any written document so the detainee can view if needed.

- (b) GEO has a contract with **Language Line Solutions** for Interpreting Services. There are **facility designated interpreters** to be used during PREA investigations. There are five staff on 1st watch designated as staff interpreters. There are three staff on 2nd watch designated as staff interpreters. There are five staff on 3rd watch designated as staff interpreters. These staff have received training in their role as interpreter and their role during the interviews.
- (c) To date the WRDF has not used any detainees as interpreters for other detainees.

There are no deaf or blind detainees at WRDF. This standard is verified by staff and detainee interviews.

§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)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 300.27 Background Screening dated 8/5/13 addressed this standard.

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

Interview with Human Resources and general interviews with staff support all aspects of this standard.

§115.18 – Upgrades to Facilities and Technology

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

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 700.01 Programs and Services Administrative and Staff Areas dated 5/6/14 addressed this standard.

The **PREA Annual Assessment** dated November 20, 2013 stating some PREA concerns in **section # (4)** During a PREA investigation, the need for video monitoring in two inmate housing areas (7th floor dorms A & B) was determined. Cameras were installed in the identified areas and the issue has since been rectified.

In **section # (5)** four areas were recently identified as having spots that are not being captioned on video surveillance. On March 17, 2014, the Fire Safety staff member wrote a memo indicating that cameras have been installed on the 2nd floor, A, B, E and F. Also cameras were installed on 7th Floor A & B. Also, DVR's had also been installed on 2nd and 7th floor and are accessible to the server. The newly installed cameras are able to monitor on a 24/7 basis.

In addition to this, the recording system on the 2nd & 4th floors were revamped so that 16 channels are being recording simultaneously.

Verified by staff interviews.

§115.21 – Evidence Protocol and Forensic Medical Examinations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 –E Investigating Allegations of Sexually Abusive Behavior dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1400.04 PREA Investigations dated 4/30/14 addressed this standard.

Detainees will be transferred to Independent Forensic Services/La Mesa, San Diego California and counseling services will be handled by Center of Community Solutions in San Diego, California. There was one forensic medical exam conducted during the past 12 months performed by SANES/SAFEs during the past 12 months.

There have been several attempts by WRDF in conjunction with the U.S. Marshal Service to develop an MOU. Independent Forensic Services did provide follow-up services December 16, 2013 for a detainee of Sexual Abuse that occurred at another facility.

Several attempts had been made by the PREA Auditor to Contract the Center for Community Solutions. Contact was made with the Center for Community Solutions Director Maria Outcalt-Smith on July 30, 2014. The Director indicated they have several agencies request an MOU and want to be able to standardize the MOU before signing. She also commented on the hotline being available for detainees to use. The Center staff would be available to provide emotional support at the forensic exam, at the detainee's request.

This standard was verified by staff interviews.

§115.22 – Policies to Ensure Referrals of Allegations for Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1400.04 PREA Investigations dated 4/30/14 addressed this standard.

- (a.) During the past 12 months, number of allegations of sexual abuse and sexual harassment was 25 and all 25 resulted in administrative investigations. There have been no criminal investigations.
- (b.) Policies listed above addressed this standard. The agency policy regarding the referral of allegations of sexual abuse or sexual harassment for a criminal investigation is published on the agency website www.geogroup.com.
- (c.) San Diego Sheriff's Department is responsible for conducting any criminal investigations. The WRDF will also have to report any criminal investigations to the USMS' COTR.

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

§115.31 – Employee Training

XX Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 400.01 Training Requirements dated 4/30/14 addressed this standard.

There is a four (4) hour initial PREA training called GEO 131 which was developed 2/14/13 and a two (2) hour training GEO 293 PREA (In-Service) Training developed 10/21/13. There are signed acknowledgements of staff training. There continues to be ongoing refresher training in the area of Transgender or intersex detainee searches in shift briefings. There is also a brochure which is provided to staff which covers searching procedures of transgender detainees. There is also a transgender form to aid with appropriate questions to ask to assist with housing, showering, strip searches, etc. There is also a brochure which is provided to staff in regards of transgender detainees being able to shower separately from other detainees upon their request. The transgender searches are also covered in shift briefings. There is also a medical protocol for medical staff in regards to transgender and intersex inmates. Due to the ongoing training in shift briefing, the PREA brochures/guidelines to assist staff in regards to transgender and intersex detainees and medical protocol information to assist medical staff this standard substantially exceeds requirement of standard.

This standard was verified by staff interviews.

§115.32– Volunteer and Contractor Training

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard. WRDF/SD Policy 400.01 Training Requirements dated 4/30/14 addressed this standard. All active volunteers and contractors have received PREA Training.

(a) All volunteers who have contact with inmates have been trained regarding PREA.

Verified by contract and staff interviews.

§115.33 – Inmate Education

XX Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD The Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard. The Inmate Orientation Package dated 11/9/11 addressed this standard.

(a) During intake detainees receive orientation on PREA.

(b) Detainees usually receive the PREA information in orientation on the same day or within 24 hours of arrival.

(c) All current detainees have received PREA information.

(d) Detainees have access to interpreters, TTY phones, and counselors are available to read to them if needed. There is also Language Line Solutions to assist with interpreters. There are several staff on each shift to assist with interpreting.

(e) There are also PREA video Orientation signature sheets indicating detainees received PREA orientation. Detainees sign two PREA forms; one during intake and one upon release at the (PREA) exit briefing.

(f) There are PREA Orientation Videos in English and Spanish for males and females. PREA Orientation videos were viewed by the PREA auditor. All detainees receive information which addressed Sexual Abuse and Sexual Harassment during orientation which is communicated orally and in writing in English and Spanish. There is an orientation handout which is both in English and Spanish.

The Dayroom PREA postings are both in English and Spanish. The 2013 Detainee Handbook is both in English and Spanish which contains PREA information. Page 8, 9,

and 10 of the Detainee Handbook has very thorough information for potential victims, abusers and how to report a sexual abuse or sexual harassment incident. There are PREA brochures for detainees both in English and Spanish.

There are also (Red) PREA posters in English and Spanish which are located throughout the building regarding the agency's zero tolerance policy. The address and toll free hot line number *333 to the Office of Inspector General (OIG) are posted in all detainee housing units. Furthermore, the 1-800 number is a free, private non-monitored telephone call. There are also Victim Advocacy Posters posted on each of the housing floors (1-7) as well as in common areas, i.e. visitation, medical, intake, recreation bulletin board and the library.

The PREA Manager also conducts weekly meetings on the floor to ensure that detainees have been informed on Sexual abuse and Sexual harassment.

Interviews with staff and inmates verified this standard.

Due to the thoroughness of the Detainee Handbook, the orientation handout, PREA brochures, PREA exit briefing and Victim Advocacy Posters, this standard substantially exceeds requirement of standard.

§115.34 – Specialized Training: Investigations

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

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 400.01 Training Requirements dated 4/30/14 addressed this standard.

Review of Training Curriculum to 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 in referral addressed this standard. There were three facility staff who received specialized training, Sean Desmond, Nicole Allen and Eric Perez. Sean Desmond previously worked at Chula Vista Police Department as an Investigator with Sexual Abuse and other areas of investigation and more recently has gone through the PREA (Sexual Abuse) Investigator training. The Investigator Training was provided by the agency person who received specialized training which is Phebia Moreland.

§115.35 – Specialized Training: Medical and Mental Health Care

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 400.01 Training Requirements dated 4/30/14 addressed this standard.

PREA Training for Medical and Mental Health staff was documented and a signed acknowledgement was verified. The PREA Compliance Manager has developed a brochure for medical regarding PREA. There is a PREA protocol book to assist medical. There was also Learning Management Systems (LMS) webinar specifically for medical staff which was provided by the Corporate office. There are acknowledgement signatures from medical and mental health staff indicating they understood the training.

Due to the extra medical training in this area in regards to PREA, this standard substantially exceeds requirement of standard.

This standard was verified by staff interviews.

§115.41 – Screening for Risk of Victimization and Abusiveness

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated April 30, 2014 addressed this standard.

The screening instrument addressed all the required elements of the standard with the exception of #10. Reviewed the screening instrument, looking for item #10 of the standard, which is "Civil Immigration". The counselors notate what the detainee's current charges are, such as illegal entry. This information is part of the intake screening but it is not generated from questioning the detainee but is listed on the US Marshal (Form 129) Individual Custody/Detention Report form which indicates information such as, *Illegal Entry* which meets the Civil Immigration section of the standard. There is a 30 day reassessment and a 90 day reassessment review. There is also a PREA Exit Questionnaire that is filled out.

This standard was verified by staff and inmate interviews.

§115.42 – Use of Screening Information

XX Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1800.01 Classification Procedures dated 6/12/14 addressed this standard.

All detainees are assessed upon arrival, with a reassessment occurring 30 and 90 days. There are currently no Transgender or intersex detainees at WRDF. Detainees who score as a risk of victimization are reviewed for housing placement in compliance with the standard. Housing and program assignments are determined on a case-by-case basis.

- (a) The risk screening instrument is used to assess sexually victimized detainees from those at high risk of begin sexually abusive.
- (b) Determinations are made on a case-by-case basis.
- (c) In deciding to place transgender or intersex detainees into housing or programs it will be done on a case-by-case basis.
- (d) There are currently no transgender or intersex detainees at WRDF. However, in the past, when housed, these detainees were reviewed **weekly**.
- (e) Detainees own views are given consideration when being interviewed.
- (f) Transgender and intersex detainees are allowed to shower separately in other areas besides the housing units, such as medical or Intake if they so choose

This was verified by staff interviews. No Transgender or Intersex detainees currently at WRDF. Intake screening should take place within 72 hours, however, Intake screening at WRDF is done the same day, this standard substantially exceeds requirement of standard.

§115.43 – Protective Custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

Since August 2012, there have not been any incident where a detainee with a high risk of sexual victimization been housed involuntarily in segregation/protective custody.

§115.51 – Inmate Reporting

XX Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

- (a) There are multiple ways for detainees to privately report sexual abuse and sexual harassment. Detainees can report it to a staff member, write to the Warden, Assistant Warden, Chaplain or Health Services Administrator. A detainee can file an emergency grievance directly with the Field Office Director. The Detainee can write to the U.S. Marshal as confidential correspondence and use legal mail procedures. Information is provided on the PREA Posters with 1-800-869-4499 to the OIG office and the PREA hotline *333 that detainees can call free of charge. There is also information in the Detainee Handbook on how to report a sexual abuse or sexual harassment incident.
- (b) Detainees can report abuse or harassment to a public or private entity or office that is not part of the agency. Detainees detained solely for civil immigration purposes can send a letter to their designated Consulate Office in California. Addresses are posted along with phone numbers for detainees to contact the Consular's office directly. The Detainee can write to the U.S. Marshal as confidential correspondence and use legal mail procedures. Information is provided on the PREA Posters with 1-800-869-4499 to the OIG office and the PREA hotline *333 which goes to an independent source called Netclaims. Once a person calls the hotline number the report is received by Netclaims 24/7 and is entered into a database which sends an electronic notification report immediately to the Vice President of OPR (Office of Professional Standards) for review and processing. Detainees can call any of the PREA phone numbers free of charge. The detainee can write to the Office of Inspector General in Washington, D.C. address is included in the Detainee Orientation handout and Detainee Handbook.
- (c) Staff are able to accept verbal, written and anonymous reports and can submit the information to their direct supervisor or the PREA Compliance Manager.
- (d) Staff can privately report to the Chief of Security or any facility management team member. The staff member can also privately report by calling the Employee Hotline, which is an independent professional service available 24/7. They can report privately through www.reporhotlineweb.com/geogroup. Staff can also call the toll free #1-866-568-5425 or the Corporate PREA Director at 561-999-5827.

Staff can privately report sexual abuse and sexual harassment of inmates to supervisors or through the website www.geogroup.com. There is also an employee reporting information brochure. Staff have also received training in this process. This standard substantially exceeds requirement of standard.

Verified by staff and detainee interviews.

§115.52 – Exhaustion of Administrative Remedies

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard. WRDF/SD Policy 1400.02 Detainee Grievances dated

4/30/14 addressed this standard. WRDF/SD Policy 1400.04 PREA Investigations dated 4/30/14 addressed this standard.

Detainee handbook contains relevant information for filing a Sexual Assault/Harassment related grievance. Reviewed Detainee Grievance regarding PREA: Investigation and Notification which was filed October 4, 2013 and answered October 15, 2013 as unsubstantiated. There were no emergency grievances filed pursuant to this standard.

Verified by staff and detainee interviews.

§115.53 – Inmate Access to Outside Confidential Support Services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard. The Detainee Handbook addressed this standard. The Detainees can request to use the phone for unmonitored phone calls to call Victim's Advocacy Group. There was an example of a detainee's request to call the Victim's Advocacy Group.

Victim Advocacy posters are found on each of the housing floors (1-7) as well as in common areas i.e. visitation, medical, intake, recreation bulletin board and the library. Victim Advocacy Address: 4508 Mission Bay Drive, San Diego, Ca 92109; Office (858)-272-5777 - Hotline (888)-385-4657. Detainees will be transferred to Independent Forensic Services/La Mesa, San Diego California and counseling services will be handled by Center of Community Solutions in San Diego, California. There was one forensic medical exam conducted during the past 12 months performed by SANes/SAFEs.

There have been several attempts by WRDF in conjunction with the U.S. Marshal Service to develop an MOU. Independent Forensic Services did provide follow-up services December 16, 2013 for a detainee of Sexual Abuse that occurred at another facility.

§115.54 – Third-Party Reporting

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. Employee PREA Posting addressed this standard. There is a website for third-party reporting which is www.geogroup.com to report sexual abuse or sexual harassment on behalf of the detainee.

Staff can privately report to the Chief of Security or Facility Management Team. The staff member can also privately report an incident of sexual abuse or sexual harassment by calling the Employee Hotline, which is an independent professional service available 24/7. They can report privately through www.reporthotlineweb.com/geogroup. Staff can also call the toll free #1-866-568-5425 or the Corporate PREA Director at 561-999-5827.

§115.61 – Staff and Agency Reporting 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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

WRDF/SD has not received any reports of abuse from anyone considered vulnerable under California state statute. Training Curriculum was reviewed regarding PREA requirements. A Detainee Grievance report was reviewed. Verified by staff interviews.

§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)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

The WRDF has determined that an inmate was subject to substantial risk of imminent sexual abuse two times in the past 12 months. Immediate action was taken at the time of those incidents. There is a WRDF/SD Sexual Assault/Harassment Checklist for staff to follow. This checklist provides definitions of Sexual Assault/Rape and Sexual Harassment as well of what to do in case of an incident and third party/anonymous reporting.

Verified by staff interviews.

§115.63 – Reporting to Other Confinement Facilities

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

There were 3 allegations received from detainees that they were abused while confined at another facility. Notification letters with corresponding investigation information is sent to the Warden of the facility where the incident occurred.

Verified by staff interviews.

§115.64 – Staff First Responder Duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

There is a PREA card issued to officers with instructions on what to do if there is a sexual assault incident. The PREA Training Curriculum information shows First Responder Duties. To date there has not been any PREA incidents requiring implementation of all 4 steps of the first responder duties.

§115.65 – Coordinated Response

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard. There is a WRDF/SD Protocol plan to address coordinated efforts in response to incidents of sexual abuse or sexual harassment.

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

The WRDF does not have a collective bargaining agreement.

§115.67 – Agency Protection Against Retaliation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

Nicole Allen, Programs Director and PREA Compliance Manager and Dr. Jeff Slotnik Psychologist are responsible for monitoring possible retaliation. PREA retaliation logs were reviewed from May 2013 and 2014. PREA change of housing logs were reviewed. Verified by staff and detainee interviews.

§115.68 – Post-Allegation Protective Custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard. WRDF/SD Policy 1800.01 Classification dated 6/12/14 addressed this standard.

To date there has not been any incident where a detainee is housed in protective custody following an allegation of sexual abuse. This standard was verified by staff and detainee interviews.

§115.71 – Criminal and Administrative Agency Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. WRDF/SD Policy 1400.04 PREA Investigations dated 4/30/14 addressed this standard.

There were no substantiated allegations of conduct that appear to be criminal. Verified by staff interviews.

§115.72 – Evidentiary Standard for Administrative Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. WRDF/SD Policy 1400.04 PREA Investigations dated 4/30/14 addressed this standard.

A completed PREA incident report was reviewed. PREA logs and files were reviewed. This standard verified by staff interviews.

§115.73 – Reporting to Inmate

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. WRDF/SD Policy 1400.04 PREA Investigations dated 4/30/14 addressed this standard.

There were 9 allegations of alleged detainee sexual abuse that were completed by the facility in the last 12 months. Of the alleged sexual abuse investigations that were completed in the past 12 months, 8 detainees were notified, verbally or in writing of the results of the investigation. One detainee was released prior to the completion of the investigation. There were no investigations completed by an outside agency in the last 12 months.

This standard was verified by staff and detainee interviews.

§115.76 – Disciplinary Sanctions for Staff

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. WRDF/SD Policy 300.18 Employee Progressive Discipline dated 6/12/14 addressed this standard supersedes 7/9/13.

No staff at WRDF/SD have violated agency sexual abuse or sexual harassment policies. Employee Handbook contains information on Sexual Assault, Sexual Harassment and PREA responsibilities. Verified by staff interviews.

§115.77 – Corrective action for Contractors and Volunteers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

There have been no contractors/volunteers reported to law enforcement agencies for engaging in sexual abuse of detainees. Verified by staff interviews.

§115.78 – Disciplinary Sanctions for Inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. WRDF/SD Policy 1000.01 Detainee Discipline dated 1/17/14 addressed this standard. Detainee handbook addressed this standard. Detainee Discipline Report involving inmate-on-inmate sexual abuse.

There were 8 findings of inmate on inmate sexual abuse that have occurred at the facility in the past 12 months. Detainee discipline Reports involving inmate-on-inmate sexual abuse were reviewed. Verified by staff interviews.

§115.81 – Medical and Mental Health Screenings; History of Sexual Abuse

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

GEO Corporate Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior and Evidence Collection dated 4/14/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard. Medical Screening with corresponding follow-up treatment examples reviewed.

Since August 2012 there have not been any incidences where prior victimization needed to be reported by medical/mental health staff. Verified by staff and detainee interviews.

§115.82 – Access to Emergency Medical and Mental Health Services

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

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

A Detainee did receive medical and mental health examination for an alleged incident of 12/15/13, however his case was unsubstantiated.

This standard verified by staff and inmates.

§115.83 – Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers

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

GEO Corporate Policy 5.1.2 Sexually Abusive Behavior prevention and Intervention Program dated 8/16/ 13 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard.

There was 1 detainee that alleged sexual abuse by another inmate at another facility. He alleged the sexual assault occurred on May 5, 2013 and reported it to his attorney on May 10, 2013. This detainee was sent to the local rape crisis center by MCC on May 10, 2013 for a forensic examination. The Detainee was then sent to WRDF on 6/4/2013 and received follow-up by medical and mental health care and phone calls with the Victim's Advocate Office. The detainee was transferred to another facility on 3/25/14. There was one forensic exam conducted during the past 12 months at WRDF. This detainee was transferred on 12/13/13.

§115.86 – Sexual Abuse Incident Reviews

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

GEO Corporate Policy 5.1.2 A Sexually Abusive Behavior prevention and Intervention Program dated 4/11/14 addressed this standard. WRDF/SD Policy 1300-05 Prison Rape Elimination Act dated 4/30/14 addressed this standard. WRDF/SD Policy 1400.04 PREA Investigations dated 4/30/14 addressed this standard.

There were 21 investigations of alleged sexual abuse completed at this facility and all were followed by a sexual review within 30 days. Verified by staff interviews.

§115.87 – Data Collection

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard.

According to this policy N.1 c. upon request, GEO shall provide such data from the previous calendar year to the Department of Justice no later than June 30. There is a monthly and annual PREA report which contains both inmate on inmate and staff on inmate sexual abuse and harassment cases. GEO also has a PREA Incident Report Survey. Data is collected internally and GEO's data is aggregated with every private facility with which it contracts for the confinement of its inmates. Reports are posted on the PREA page which can be found in "About Us" section of GEO's website.

§115.88 – Data Review for Corrective Action

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Corporate Policy & Procedure #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA) for Adult Prison and Jail and Adult Community Confinement Facility dated 4/11/14 addressed this standard. The standard 115.88 (c)-1 states “The agency makes its annual report readily available to the public at least annually through its website.” This standard requires the agency (GEO) to publish their annual report on a public website. The annual report is posted on the PREA page which can be found in “About Us” section of the GEO’s website.

§§115.89 – Data Storage, Publication, and Destruction

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

GEO does prepare annual reports in accordance with data collection standards. Data is collected internally and GEO’s data is aggregated with every private facility with which it contracts for the confinement of its inmates. Reports are posted on the PREA page which can be found in “About Us” section of GEO’s website.

AUDITOR CERTIFICATION:

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

Cathy Slack
Auditor Signature

December 29, 2014
Date