

Prison Rape Elimination Act (PREA) Audit Report Lockups

Interim Final

Date of Report August 27, 2018

Auditor Information

Name: Barbara Jo Denison	Email: denisobj@sbcglobal.net
Company Name: Shamrock Consulting, LLC	
Mailing Address: 2617 Xavier Ave.	City, State, Zip: McAllen, TX 78504
Telephone: 956-566-2578	Date of Lockup Visit: July 17, 2018

Agency Information

Name of Agency: The GEO Group, Inc.	Governing Authority or Parent Agency (If Applicable): N/A		
Physical Address: One Park Place, Suite 700, 621 Northwest 53rd St.	City, State, Zip: Boca Raton, FL 33487		
Mailing Address: SAA	City, State, Zip: SAA		
Telephone: 561-893-0101	Is Agency accredited by any organization? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
The Agency is:	<input type="checkbox"/> Military	<input checked="" type="checkbox"/> Private for Profit	<input type="checkbox"/> Private not for Profit
<input type="checkbox"/> Municipal	<input type="checkbox"/> County	<input type="checkbox"/> State	<input type="checkbox"/> Federal
Agency mission: GEO's mission is to develop innovative public-private partnerships with government agencies around the globe that deliver high quality, cost-efficient correctional, detention, community reentry, and electronic monitoring services while providing industry leading rehabilitation and community reintegration programs to the men and women entrusted in GEO's care.			
Agency Website with PREA Information: https://www.geogroup.com/PREA			

Agency Chief Executive Officer

Name: George C. Zoley	Title: Chairman of the Board, CEO and Founder
Email: gzoley@geogroup.com	Telephone: 561-893-0101

Agency-Wide PREA Coordinator

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

PREA Coordinator Reports to: Daniel Ragsdale, Executive Vice President, Contract Compliance	Number of Compliance Managers who report to the PREA Coordinator 54 (US Corrections), 46 (Reentry Services), 8 (Youth Services), 3 (Lockups) = 111 Total
---	---

Lockup Information

Name of Lockup: Montebello City Jail

Physical Address: 1600 W. Beverly Blvd., Montebello, CA 90640

Mailing Address (if different than above): SAA

Telephone Number: 323-887-1230

The Lockup Is: Military Private for Profit Private not for Profit

Municipal County State Federal

Lockup Type: Police Sheriff Court Holding Other

Lockup Mission: The mission of the Montebello Police Department is to provide effective and professional police services of the highest quality, in partnership with the citizens we serve, encouraging mutual respect and innovative problem solving, thereby improving the quality of life in our community.

Lockup Website with PREA Information: <https://www.geogroup.com/PREA>

Have there been any internal or external audits of and/or accreditations by any other organization? Yes No

Director

Name: Brittany Moore **Title:** Jail Administrator

Email: brimoore@geogroup.com **Telephone:** 323-887-1230

Lockup PREA Compliance Manager

Name: Arturo Hernandez **Title:** Jail Administrator (Alhambra City Jail)

Email: arthernandez@geogroup.com **Telephone:** 626-570-5171

Lockup Health Service Administrator

Name: N/A **Title:** N/A

Email: N/A **Telephone:** N/A

Lockup Characteristics

Designated Lockup Capacity: 19 **Current Population of Lockup:** 1

Number of detainees admitted to lockup during the past 12 months 1831

Number of detainees admitted to lockup during the past 12 months who were transferred from a different community confinement lockup:		495
Number of detainees admitted to lockup during the past 12 months whose length of stay in the lockup was for 30 days or more:		0
Number of detainees admitted to lockup during the past 12 months whose length of stay in the lockup was for 72 hours or more:		0
Number of detainees on date of audit who were admitted to lockup prior to August 20, 2012:		0
Age Range of Population	<input checked="" type="checkbox"/> Adults 28	<input type="checkbox"/> Juveniles N/A
		<input type="checkbox"/> Youthful detainees N/A
Are youthful detainees housed separately from the adult population		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Number of juveniles/youthful detainees held in the lockup during the past 12 months:		0
Are detainees housed overnight?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Average length of stay or time under supervision:		24 hours
Lockup Security Level:		Minimum
Detainee Custody Levels:		Minimum
Number of staff currently employed by the lockup who may have contact with detainees:		4
Number of staff hired by the lockup during the past 12 months who may have contact with detainees:		4
Number of contracts in the past 12 months for services with contractors who may have contact with detainees:		0
Physical Plant		
Number of Buildings: 1		Number of Single Cell Holding Areas: 0
Number of Multiple Cell Holding Areas:		10
Description of any video or electronic monitoring technology (including any relevant information about where cameras are placed, where the control room, is retention of video, etc.):		
The facility has video cameras throughout the jail in all hallways and in the sally port entrance.		
Medical		
Type of Medical Lockup:		All medical services provided offsite
Forensic sexual assault medical exams are conducted at:		Beverly Hospital
Other		
Number of contractors and inmates currently working in the lockup:		0
Number of volunteers, who may have contact with detainees, authorized to enter the lockup:		0
Number of volunteers and individual contractors currently authorized to enter the lockup:		0
Number of investigators the agency currently employs to investigate allegations of sexual abuse:		111 agency-wide 1 at this facility

Audit Findings

The PREA audit of the Montebello City Jail was conducted on July 17, 2018. The GEO Group, Inc. operates the Montebello City Jail Lockup. The lockup houses male detainees awaiting arraignment date. The facility also has a Pay-to-Stay Program where sentenced detainees can pay \$100 per day to fulfill their sentence.

PRE-AUDIT PHASE

Pre-audit preparation included a thorough review of agency policy 5.1.2-CC, facility Field Policy Manual 1300.02, procedures, training curriculums, the Pre-Audit Questionnaire and supporting PREA-related documentation provided by the facility to demonstrate compliance to the PREA standards. During this review period, questions were answered by Arturo Hernandez, PREA Compliance Manager who is designated at the PREA Compliance Manager for this facility and for the Baldwin Park City Jail and Alhambra City Jail, and by Brittany Moore, the Montebello City Jail Administrator. The facility was provided with facility notices in English and Spanish informing residents of the upcoming audit dates with my name and address if they wished to send correspondence to me. Residents were informed on the notices that correspondence sent to me would be handled like legal mail. There was no PREA-related correspondence received from detainees at the Montebello City Jail.

Documentation for criminal background checks and related documentation as well as documentation of PREA training for all employees was forwarded to me for my review in the PREA files. Review of these files revealed that criminal background checks are being completed for applicants and for employees being considered for a promotion or transfer. All employees are receiving PREA training as part of their pre-service program and annually completing PREA refresher training. Employee files are maintained by at GEO's Western Region Office by the Human Resource Manager.

ONSITE AUDIT PHASE

On the first day of the audit, a brief entrance meeting was held with Arturo Hernandez, PREA Compliance Manager, Brittany Moore, Jail Administrator, Steve Lechuga, Director of Jails and Phebia Moreland, Director, Contract Compliance PREA Coordinator in attendance, followed by a site review of the facility.

During the site review locations of cameras, room layout, restrooms and the placement of PREA posters and information was observed. Reporting Options posters, Third Party Reporting posters and facility notices, all in both English and Spanish, were posted in the booking area, holding cells and in all living areas. Facility notices noted the date posted as 6/11/18. Showers have curtains for privacy and detainees are provided with portable partitions that are placed in front of the toilets to give detainees privacy when toileting in holding cells and living areas.

The number for the Peace Over Violence, an area agency that provides detainees with a reporting hotline and victim support services, was dialed on a detainee pay phone. The number was found to be forwarded to advocates from the LA Rape and Battery Hotline. Detainees call this number by using an anonymous pin number (90640). This allows the caller to remain anonymous and calls to this number are not recorded. The number for the RAINN National Hotline (#611) was also dialed and was also found to be forwarded to the LA Rape and Battery Hotline.

The one detainee that was housed at the Montebello City Jail was interviewed. He reported receiving the PREA pamphlet during intake. He was aware of the zero-tolerance policy and knew the methods of reporting available to him.

All staff scheduled to work on the day of the audit visit were interviewed for a total of three Jail Officers and the Jail Administrator. The GEO Western Region Human Resource Manager was interviewed by telephone. The Jail Officers were asked the random staff questions as well as the questions for those that screen for risk of victimization and abusiveness. The Jail Administrator is the Facility Director, the Facility Investigator; she is responsible for retaliation monitoring, conducts screenings for risk of victimization and abusiveness and is on the Incident Review Team. She was asked the questions related to each of those roles, as well as the random staff questions. All staff interviewed confirmed completing PREA classroom training at pre-service and annual online training through the Learning Management System (LMS). They were knowledgeable of the zero-tolerance policy and knew what steps to take if a detainee alleged abuse to them and to whom to report.

The PREA Risk Assessments of the one detainee housed at the facility during the audit as well as random assessments of 10 detainees that were housed during the month of July were reviewed to determine compliance with screening procedures. All forms were found to be complete. Detainees sign on the bottom of the form that they received the PREA pamphlet upon intake.

In the 12 months preceding the audit nor at any time, there have been no allegations of sexual abuse or sexual harassment reported at the Montebello City Jail. If allegations were reported, the Montebello Police Department would investigate all allegations. In the event the Montebello Police Department determines the allegation is not criminal, the allegation may be referred back to the facility for investigation. The Jail Administrator is the facility's trained investigator responsible for administrative investigations of allegations of sexual abuse and sexual harassment in the event that the Montebello Police Department refers the allegation back to the facility for administrative investigation.

POST-AUDIT PHASE

At the conclusion of the audit of the Alhambra City Jail on 7/18/18, an exit meeting was held to discuss the audit findings for the Alhambra City Jail, the Baldwin Park City Jail and the Montebello City Jail with Arturo Hernandez, Jail Administrator/PREA Compliance Manager and Phebia Moreland, Director, Contract Compliance PREA Coordinator. The Jail Administrator/PREA Compliance Manager was thanked for his cooperation prior to the audit visits and during all three audits. He was informed of the process that would follow the audit visits and of GEO's responsibility to publish the final audit reports on the agency's website.

All documentation received prior to the on-site visit and documentation received during the On-Site Audit Phase was reviewed. Observations made during the site review of the facility and information gathered through interviews with detainees and staff was reviewed. Through this review during the Post-Audit Phase, a determination was made of compliance to all of the PREA standards.

Lockup Characteristics

The Montebello City Jail is located at 1600 W. Beverly Blvd, Montebello, CA. The lockup has the capacity to house up to 19 male detainees. On the first day of the audit there was one detainee housed at the Montebello City Jail. The detainee was in the Pay-to-Stay Program that allows sentenced detainees to pay \$100 per day to stay in the lockup to fulfill their sentence. Detainees who are awaiting arraignment dates arrive to the facility through a sally port area that doubles as a fenced recreation area for detainees with weight benches, picnic tables and a washer and dryer. When entering through the sally port detainees are brought to a booking room where they are processed into the facility and PREA risk assessments are completed. PREA posters and facility notices were posted in the booking room.

There is a Control Room where Jail Officers document all facility movement and activities and view live camera footage. A holding cell is adjacent to the Control Room where staff have visual of detainees in the holding cell from the Control Room. Across from the Control Room, there is a non-contact visitation room, a sobering room and another holding cell. Holding cells have a pay phone in each cell and a toilet and sink within the cells.

The Montebello City Jail lockup area has six housing cells. There are three cells in the first hallway to the left of the Control Room with two bunks in each room, a sink and toilet within the room and a pay telephone. Another small hallway has Cells A, B, C and D. Cell A is on one side of the hallway and is used for detainees who are in a Pay-to-Stay Program. Cell A can house up to seven detainees. There is a desk with chairs, a sink and toilet with a barrier to block the view of the area from the cell door and a single shower stall with a shower curtain for privacy.

Opposite the hallway from Cell A, there is a dayroom with three tables with stools, a shower stall with a shower curtain and a pay telephone. Adjacent to the day room there are three cells, Cells B, C and D. There are two bunks in each of these cells, a toilet and sink within the cell and a pay telephone.

The facility currently has four staff, which includes a Jail Administrator and three Jail Officers. There are vacancies for two Jail Officers. Jail Officers conduct four formal head counts in a 24-hour period and security checks every 30-60 minutes around the clock. The facility has 12 cameras, (3 exterior and 9 interior).

Summary of Audit Findings

The audit findings for the audit of the Montebello City Jail conducted on July 17, 2018 are as follows:

Number of Standards Exceeded: 4

The facility was found to exceed in the requirements of the following standards: 115.111; 115.117; 115.131 and 115.188.

Number of Standards Met: 31

The facility was found to meet all requirements of the following standards: 115.112; 115.113; 115.114; 115.115; 115.116; 115.118; 115.121; 115.122; 115.132; 115.134; 115.141; 115.151; 115.154; 115.161; 115.162; 115.163; 115.164; 115.165; 115.166; 115.167; 115.171; 115.172; 115.176; 115.177; 15.178; 115.182; 115.186; 115.187; 115.189; 115.401 and 115.403.

Number of Standards Not Met: 0

Summary of Corrective Action (if any) N/A

PREVENTION PLANNING

Standard 115.111: Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

All Yes/No Questions Must Be Answered by The Auditor to Complete the Report

115.111 (a)

- Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? Yes No
- Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? Yes No

115.111 (b)

- Has the agency employed or designated an agency-wide PREA Coordinator? Yes No
- Is the PREA Coordinator position in the upper-level of the agency hierarchy? Yes No
- Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its lockups? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.111 (a): GEO policy 5.1.2-C and the Montebello City Jail Field Policy Manual, FM 1300.02 are written policies mandating zero tolerance towards all forms of sexual abuse and sexual harassment and outlines the agency's/facility's approach to preventing, detecting and responding to such conduct. Both policies include definitions of prohibited behaviors and sanctions for those found to participate in these prohibited behaviors. The policies includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of detainees. Both policies were found to be comprehensive and address all provisions of the PREA standards, exceeding in the requirements of this standard.

115.211 (b): GEO policy 5.1.2-C, pages 5 & 6, section III-B, outlines the responsibilities of the agency's PREA Coordinator and Montebello Police Department Policy Manual, section 904, outlines the responsibilities of the PREA Compliance Manager. The Jail Administrator for the Alhambra City Jail is

designated as the PREA Compliance Manager for this facility as well as the Alhambra City Jail and Baldwin Park City Jail.

In interview with the agency's PREA Coordinator at an earlier date and the PREA Compliance Manager during the on-site audit, both stated that they have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required

Standard 115.112: Contracting with other entities for the confinement of detainees

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.112 (a)

- If this agency is law enforcement and it contracts for the confinement of its lockup detainees in lockups operated by private agencies or other entities, including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the law enforcement agency does not contract with private agencies or other entities for the confinement of detainees.) Yes No NA

115.112 (b)

- Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of detainees OR the response to 115.112(a)-1 is "NO".) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- 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 is a private provider and does not contract for the confinement of its detainees; therefore, this standard is not applicable to this facility.

Standard 115.113: Supervision and monitoring

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.113 (a)

- Does the agency ensure that it has developed for each lockup a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect detainees against sexual abuse? Yes No
- Does the agency ensure that it has documented for each lockup a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect detainees against sexual abuse? Yes No
- Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The physical layout of each lockup? Yes No
- Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the detainee population? Yes No
- Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The prevalence of substantiated and unsubstantiated incidents of sexual abuse? Yes No
- Does the agency ensure that it takes into consideration the 4 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors? Yes No

115.113 (b)

- In circumstances where the staffing plan is not complied with, does the lockup document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)
 Yes No NA

115.113 (c)

- In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to the staffing plan established pursuant to paragraph (a) of this section? Yes No
- In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to prevailing staffing patterns? Yes No
- In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to the lockup's deployment of video monitoring systems and other monitoring technologies? Yes No
- In the past 12 months, has the lockup assessed, determined, and documented whether adjustments are needed to the resources the lockup has available to commit to ensure adequate staffing levels? Yes No

115.113 (d)

- If vulnerable detainees are identified pursuant to the screening required by § 115.141, does security staff provide such detainees with heightened protection, to include continuous direct sight and sound supervision? Yes No
- If vulnerable detainees are identified pursuant to the screening required by § 115.141, does security staff provide such detainees with heightened protection, to include: Single-cell housing or placement in a cell actively monitored on video by a staff member sufficiently proximate to intervene, unless no such option is determined to be feasible? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.113 (a): Based on GEO policy 5.1.2-C, pages 6 & 7, section C-1 and FM 1300.02, page 8, section O, the agency/facility has developed and documented a staffing plan that provides for adequate levels of staffing and uses video monitoring to protect detainees against sexual abuse. The agency took into consideration the physical layout of the facility, the composition of the population and the prevalence of substantiated incidents of sexual abuse, and any other relevant factors in the development of the facility's staffing plan. The staffing plan for the Montebello City Jail includes a Jail Administrator and five Jail Officers. At this time, there are vacancies for two Jail Officers. If at any time, there are vacant positions or call-ins, positions are filled with the use of mandatory overtime and call-in coverage from one of the other LA lockup facilities.

115.113 (b): According to information provided on the Pre-Audit Questionnaire and on interview with the PREA Compliance Manager, in the past 12 months there have been no deviations from the staffing plan; therefore, this provision of the standard is not applicable to this facility.

115.113 (c): Whenever necessary and no less than annually, the staffing plan is reviewed and documented on the *Annual PREA Facility Assessment – Lock-Ups* form. This completed form is submitted to the Corporate PREA Coordinator and the Corporate Divisional Vice President for signature and approval of any recommendations made to the established staffing plan to include the deployment of video monitoring systems and other monitoring technologies or the allocations of additional resources to maintain compliance to the plan. Based on the *Annual PREA Facility Assessment – Lockups* completed each year since the last PREA audit, there have been no recommendations made for changes to the established staffing plan. Per contract, there is always one Jail Officer on duty when there are detainees in the facility.

115.113 (d): If vulnerable detainees are identified through the screening process, security staff will provide vulnerable detainees with heightened protection to include direct sight and sound supervision, single-cell housing and monitored on video by a staff member.

Standard 115.114: Juveniles and youthful detainees

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.114 (a)

- Are juveniles and youthful detainees held separately from adult detainees? (N/A if the lockup does not hold juveniles or youthful detainees (detainees <18 years old).) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

The Montebello City Jail does not house juvenile and youthful detainees; therefore, this standard is not applicable to this facility.

Standard 115.115: Limits to cross-gender viewing and searches

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.115 (a)

- Does the lockup always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners? Yes No

115.115 (b)

- Does the lockup document all cross-gender strip searches and cross-gender visual body cavity searches? Yes No

115.115 (c)

- Does the lockup implement policies and procedures that enable detainees 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? Yes No
- Does the lockup require staff of the opposite gender to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing? Yes No

115.115 (d)

- Does the lockup always refrain from searching or physically examining transgender or intersex detainees for the sole purpose of determining the detainee's genital status? Yes No
- If a detainee's genital status is unknown, does the lockup determine genital status during conversations with the detainee, 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? Yes No

115.115 (e)

- Does the agency train law enforcement staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? Yes No
- Does the agency train law enforcement staff in how to conduct searches of transgender and intersex detainees in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.115 (a): Based on review of GEO policy 5.1.2-C, page 11, section I and FM 1300.02, page 9, section Q, 1-4, the agency/facility has policies in place regarding detainee searches. Cross-gender strip searches and cross-gender visual body cavity searches are prohibited except in exigent circumstances or when performed by a medical practitioner.

115.115 (b): If it is necessary to conduct a strip search of a detainee at the Montebello City Jail, the facility must justify and document all cross-gender strip searches and cross-gender visual body cavity searches. According to information provided on the Pre-Audit Questionnaire, in the past 12 months there have been no cross-gender strip searches or cross-gender visual body searches conducted.

115.115 (c): The Montebello City Jail has policies and procedures in place to allow detainees to shower, change clothing and perform bodily functions without staff of the opposite gender viewing them, except in exigent circumstances. Staff of the opposite gender are required to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions or changing clothing. This practice was observed while onsite.

115.115 (d): GEO policy 5.1.2-C, pages 11 & 12, section J and FM 1300.02, pages 9 & 10, section Q, 1-7, addresses searches of transgender and intersex detainees. Facilities shall not search or physically examine a transgender or intersex detainee solely to determine their genital status. If the genital status is unknown, it may be determined during private conversation with the individual, by reviewing

medical records or by learning this information as part of a broader medical examination conducted in private by a medical practitioner.

115.115 (e): All law enforcement staff members have training on conducting searches of cross-gender individuals and conducting searches of transgender and intersex individuals in a professional and respectful manner and in the least intrusive manner possible, consistent with security needs. Included in the GEO PREA training curriculum is training on searches. Receipt of this training was verified through interviews with staff and in review of staff training records.

Standard 115.116: Detainees with disabilities and detainees who are limited English proficient

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.116 (a)

- Does the agency take appropriate steps to ensure that detainees with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Detainees who are deaf or hard of hearing? Yes No
- Does the agency take appropriate steps to ensure that detainees with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Detainees who are blind or have low vision? Yes No
- Does the agency take appropriate steps to ensure that detainees with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Detainees who have intellectual disabilities? Yes No
- Does the agency take appropriate steps to ensure that detainees with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Detainees who have psychiatric disabilities? Yes No
- Does the agency take appropriate steps to ensure that detainees with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Detainees who have speech disabilities? Yes No
- Does the agency take appropriate steps to ensure that detainees with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other? (if "other," please explain in overall determination notes.) Yes No
- Do such steps include, when necessary, ensuring effective communication with detainees who are deaf or hard of hearing? Yes No

- Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees who: Have intellectual disabilities? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees who: Have limited reading skills? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with detainees with disabilities including detainees who: Are blind or have low vision? Yes No

115.116 (b)

- Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to detainees who are limited English proficient? Yes No
- Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? Yes No

115.116 (c)

- Does the agency always refrain from relying on detainee interpreters, detainee readers, or other types of detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety, the performance of first-response duties under §115.164, or the investigation of the detainee's allegations? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.116 (a): Based on GEO policy 5.1.2-C, page 8, section E and FM 1300.02, page 10, section R, the agency and the facility ensure that detainees with disabilities and those who are limited English proficient have an equal opportunity to participate in or benefit from the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. FM 1300.02, section R-2, states that if it is determined that a detainee is developmentally disabled or hearing impaired, the detainee would be transported to a facility where an appropriate diagnosis and/or treatment can be made.

115.116 (b): Written information is provided to every detainee in formats that ensure detainees with disabilities are able to understand it. Detainees receive the GEO *Sexual Assault Awareness* pamphlet, available, in English and Spanish, upon intake to the facility.

115.116 (c): Agency and facility policies prohibit detainees to be relied on as readers or any types of assistants, except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the detainee's safety. The Language Line will be used for detainees who need translation services. The use of detainees under these circumstances must be justified and documented in a written investigative report. In information provided on the Pre-Audit Questionnaire, in the past 12 months, detainees have not been used for this purpose. Jail Officers interviewed knew that detainees were not to be used for this purpose.

Standard 115.117: Hiring and promotion decisions

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.117 (a)

- Does the agency prohibit the hiring or promotion of anyone who may have contact with detainees who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement lockup, juvenile lockup, or other institution (as defined in 42 U.S.C. 1997)? Yes No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with detainees who: 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? Yes No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with detainees who: Has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? Yes No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with detainees who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement lockup, juvenile lockup, or other institution (as defined in 42 U.S.C. 1997)? Yes No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with detainees who: 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? Yes No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with detainees who: Has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? Yes No

115.117 (b)

- Does the agency consider 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 detainees? Yes No

115.117 (c)

- Before hiring new employees, who may have contact with detainees, does the agency: Perform a criminal background records check? Yes No
- Before hiring new employees, who may have contact with detainees, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse? Yes No

115.117 (d)

- Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with detainees? Yes No

115.117 (e)

- Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with detainees or have in place a system for otherwise capturing such information for current employees? Yes No

115.117 (f)

- Does the agency ask all applicants and employees who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions? Yes No
- Does the agency ask all applicants and employees who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees? Yes No
- Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? Yes No

115.117 (g)

- Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination? Yes No

115.117 (h)

- Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.117 (a): GEO policy 5.1.2-C, page 7 section C-2 and FM 1300.02, pages 10 & 11, interview with the Human Resource Manager, GEO Western Region Office, and review of employee files were used to verify compliance to this standard. Per policy the agency/facility prohibits hiring or promoting anyone who may have contact with detainees and prohibits enlisting the services of any contractor who may have contact with detainees who have engaged in, been convicted of, or been civilly or administratively adjudicated for engaging in sexual abuse in confinement settings or in the community.

115.117 (b): GEO 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 detainees.

115.117 (c): The agency requires that all applicants and employees who may have contact with detainees have a criminal background check. Criminal background checks for all potential employees are completed through a contract with Information Discovery Services (IDS). For those considered for promotions or who transfer from another facility, will have an internal background check through GEO conducted by Career Builders. From information provided on the Pre-Audit Questionnaire, in the past 12 months, two criminal background checks were completed.

115.117 (d): The Montebello City Jail does not have any contractors; therefore, this provision of the standard is not applicable to this facility.

115.117 (e): The agency conducts criminal background checks through IDS every five years for employees.

115.117 (f): The agency asks all applicants and employees who have contact with residents directly about previous sexual misconduct. For consideration for promotions or transfers, employees complete a *PREA Disclosure and Authorization Form Promotions – PREA Related Positions* and another background check is completed as well as a GEO internal PREA verification. At the time of annual performance appraisals, employees complete a *PREA Disclosure and Authorization Form – Annual Performance Evaluation* form.

115.117 (g): GEO policy mandates that material omissions regarding sexual misconduct and the provision of materially giving false information are grounds for termination as required by this standard. Employees have a continuing affirmative duty to disclose any sexual misconduct and/or misconduct to the Jail Administrator.

115.117 (h): Unless prohibited by law, GEO's Western Region Human Resource Office will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former

employee upon receiving a request from an institutional employer for whom the individual has applied for work.

Human Resource files of all employees of the Montebello City Jail were reviewed and were found to be complete with documentation showing adherence to standard and agency policy requirements. The Human Resource Manager, GEO Western Region Office was very knowledgeable of the agency's hiring and promotion procedures; therefore, the facility was found to exceed in the requirements of this standard.

Standard 115.118: Upgrades to facilities and technologies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.118 (a)

- If the agency designed or acquired any new lockup or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect detainees from sexual abuse? (N/A if agency/lockup has not acquired a new lockup or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)
 Yes No NA

115.118 (b)

- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect detainees from sexual abuse? (N/A if agency/lockup has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)
 Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.218 (a): GEO policy 5.1.2-C, page 7, section C-3 and facility policy 1300.02, page 8, section O-2, documentation provided for review, observation during site review and interview with the Jail Administrator were used to verify compliance to this standard. Per agency and facility policies, the Montebello City Jail will consider the effect any new design, acquisition, expansion or modification of physical plant might have on the facility's ability to protect residents from sexual abuse. In interview with the Jail Administrator, since the last PREA audit, there were no new facilities and no substantial

expansions or modifications made to the existing facility; therefore, this provision of the standard is not applicable to this facility.

115.218 (b): When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology, the agency shall consider how such technology may enhance the agency's ability to protect residents from sexual abuse.

RESPONSIVE PLANNING

Standard 115.121: Evidence protocol and forensic medical examinations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.121 (a)

- If the agency is responsible for investigating allegations of sexual abuse in its lockups, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/lockup is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA

115.121 (b)

- Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/lockup is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA
- Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/lockup is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA

115.121 (c)

- Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside lockup, without financial cost, where evidentiary or medically appropriate? Yes No
- Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? Yes No
- If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? Yes No
- Has the agency documented its efforts to provide SAFEs or SANEs? Yes No

115.121 (d)

- If the detainee is transported for a forensic examination to an outside hospital that offers victim advocacy services, does the agency permit the detainee to use such services to the extent available, consistent with security needs? Yes No

115.121 (e)

- If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/lockup is responsible for conducting criminal AND administrative sexual abuse investigations.) Yes No NA

115.121 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.121 (a): GEO policy 5.1.2-E, pages 6-10, sections D-J outlines the agency's requirements as it applies to this standard. The Montebello Police Department investigates all allegations of sexual abuse and is required to follow uniform evidence protocols that maximize the potential for obtaining usable physical evidence for administrative and criminal proceedings. In the event that the Montebello Police Department refers the allegation back to the facility for administrative investigation, the Facility Investigator will also follow a uniform evidence protocol.

115.121 (b): The protocol is adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication. As part of the training required in standard 115.131, employees of lockups will receive basic training regarding how to detect and respond to victims of sexual abuse.

115.121 (c): Victims of sexual abuse have access to forensic medical examinations. Forensic exams are not performed at this facility. According to FM 1300.02, page 11, section T, all medical services for detainees of the Montebello City Jail are coordinated through the local fire department. The Watch Commander will contact the Montebello Fire Department paramedics to respond to the jail for assistance. The paramedics will then make the decision on which facility will be appropriate to handle the situation. The facilities used are the Beverly Hospital, San Gabriel Valley Medical Center, or the Los Angeles County Medical Center. SANE providers are on call 24 hours a day at these facilities to provide exams at no cost to the detainee victim. According to information provided on the Pre-Audit

Questionnaire, in the past 12 months, there have been no detainees who have required a forensic exam.

115.121 (d): Victim advocacy services are offered to detainee victims of sexual abuse through advocates available at the Beverly Hospital, San Gabriel Valley Medical Center and the Los Angeles Medical Center. Detainees are informed they can contact the Victim Advocacy Services Hotline at 877-209-3049 to request these services.

115.221 (e): The agency requests that the Montebello Police Department follow the requirements of the provisions of this standard.

Standard 115.122: Policies to ensure referrals of allegations for investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.122 (a)

- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse? Yes No
- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment? Yes No

115.122 (b)

- If another law enforcement agency is responsible for conducting investigations of allegations of sexual abuse and sexual harassment in its lockups, does the agency have a policy in place to ensure that such allegations are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior? [N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).] Yes No NA
- Has the agency published such policy, including a description of responsibilities of both the agency and the investigating entity, on its website or, if it does not have one, made the policy available through other means? [N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).] Yes No NA
- Does the agency document all such referrals? [N/A if agency is responsible for conducting administrative and criminal investigations of sexual abuse or sexual harassment. See 115.121(a).] Yes No NA

115.122 (c)

- Auditor is not required to audit this provision.

115.122 (d)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.122 (a): GEO policy 5.1.2-E, page 4, section III-A-1 and GEO policy 5.1.2-C, outline the agency's policy and procedures for investigating and documenting incidents of sexual abuse. The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

115.122 (b): All allegations of sexual abuse and sexual harassment are referred to the Montebello Police Department for investigation. According to the FM 1300.02, page 11, section 11, the Montebello Police Department has a protocol describing the responsibilities of the Department in the conduct of investigations of sexual abuse allegations. GEO's policy regarding the referral of allegations of sexual abuse or sexual harassment for criminal investigation is published on the GEO website at <https://www.geogroup.com/PREA>.

In the past 12 months, there were no allegations of sexual abuse or sexual harassment reported at the Montebello City Jail.

TRAINING AND EDUCATION

Standard 115.131: Employee and volunteer training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.131 (a)

- Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: Its zero-tolerance policy and detainees' right to be free from sexual abuse and sexual harassment? Yes No
- Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: The dynamics of sexual abuse and sexual harassment in confinement, including which detainees are most vulnerable in lockup settings? Yes No
- Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention,

detection, and response policies and procedures, including training on: The right of detainees and employees to be free from retaliation for reporting sexual abuse or harassment?

Yes No

- Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to detect and respond to signs of threatened and actual sexual abuse? Yes No
- Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to communicate effectively and professionally with all detainees? Yes No
- Does the agency train all employees and volunteers who may have contact with lockup detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures, including training on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities? Yes No

115.131 (b)

- Have all current employees and volunteers who may have contact with detainees received such training? Yes No
- Does the agency provide each employee and volunteer with annual refresher information to ensure that they know the agency's current sexual abuse and sexual harassment policies and procedures? Yes No

115.131 (c)

- Does the agency document, through employee signature or electronic verification, that employees understand the training they have received? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.131 (a): According to GEO policy 5.1.2-C, page 9, section F-1 and FM 1300.02, page 4, section G, all employees who have contact with detainees will receive training on GEO's Sexually Abusive Behavior Prevention and Intervention Program prior to assignment. New hires complete the DOJ 2017 Pre-Service PREA Training and all employees have annual in-service PREA online training through the Learning Management System (LMS). The training curriculum was reviewed and found to include

training on all elements of this provision of the standard and found to exceed in the requirements of this standard.

115.131 (b): The facility currently has four employees and documentation was reviewed that showed that all employees receive PREA training annually. The Montebello City Jail does not have volunteers.

115.131 (c): Staff completing PREA training sign a *PREA Basic Acknowledgement* form (attachment E), acknowledging by their signature they have received and understood the training they received.

In review of staff training records, all staff have received PREA training. The facility was found to exceed in the requirements of this standard. The training curriculum was found to be comprehensive and staff interviews revealed staff are knowledgeable of the agency and facility policies and their PREA-related responsibilities.

Standard 115.132: Detainee, contractor, and inmate worker notification of the agency's zero-tolerance policy

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.132 (a)

- During the intake process, do employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment? Yes No

115.132 (b)

- Does the agency ensure that, upon entering the lockup, all contractors and any inmates who work in the lockup are informed of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.132 (a): Based on GEO policy 5.1.2-C, page 8, section E-b and FM 1300.02, page 5, section I, during the intake process detainees are notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment. Detainees are given the GEO *Sexual Assault Awareness* pamphlet, available in English and Spanish. Detainees sign on the *PREA Risk Assessment – Lockups* form that they have received the PREA pamphlet. In review of detainee records, this process is in place. The one detainee assigned to the Montebello City Jail when interviewed reported he received the pamphlet upon intake to the facility.

115.132 (b): This provision of the standard is not applicable to this facility, as the Montebello City Jail does not utilize the services of contractors.

Standard 115.134: Specialized training: Investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.134 (a)

- In addition to the general training provided to all employees pursuant to §115.131, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.121(a).] Yes No NA

115.134 (b)

- Does this specialized training include: Techniques for interviewing sexual abuse victims? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.121(a).] Yes No NA
- Does this specialized training include: Proper use of Miranda and Garrity warnings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.121(a).] Yes No NA
- Does this specialized training include: Sexual abuse evidence collection in confinement settings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.121(a).] Yes No NA
- Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.121(a).] Yes No NA

115.134 (c)

- Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.121(a).] Yes No NA

115.134 (d)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.134 (a): According to GEO policy 5.1.2-C, pages 9 & 10, section F-2 and FM 1300.02, pages 4 & 5, section H, in addition to general training provided to all employees, the agency will ensure that investigators have received training in conducting investigations in confinement settings.

115.134 (b): In review of the *PREA Specialized Investigators Training* curriculum, the training includes techniques for interviewing sexual abuse victims, proper use of the Miranda and Garrity warnings, sexual abuse evidence collection in confinement setting and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

115.134 (c): The Jail Administrator is the trained facility investigator and documentation maintained by the facility shows that she completed the *PREA Specialized Investigators Training* on 6/20/18.

115.134 (d): The Montebello Police Department conduct criminal investigations of sexual abuse and sexual harassment. The facility has attempted to enter into a Memorandum of Understanding with the police department. According to conversation with the PREA Compliance Manager, the Montebello Police Department chooses not to enter into a formal written agreement, but will assist by conducting criminal investigations.

SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

Standard 115.141: Screening for risk of victimization and abusiveness

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.141 (a)

- If the lockup is not utilized to house detainees overnight, before placing any detainees together in a holding cell do staff consider whether, based on the information before them, a detainee may be at a high risk of being sexually abused? (N/A if the lockup is utilized to house detainees overnight.) Yes No NA
- When appropriate, do staff take necessary steps to mitigate such danger to the detainee? (N/A if the lockup is utilized to house detainees overnight.) Yes No NA

115.141 (b)

- If the lockup is utilized to house detainees overnight, are all detainees screened to assess their risk of being sexually abused by other detainees or sexually abusive toward other detainees? (N/A if lockup is NOT used to house detainees overnight.) Yes No NA

115.141 (c)

- In lockups described in paragraph (b) of this section, do staff always ask the detainee about his or her own perception of vulnerability? (N/A if lockup is NOT used to house detainees overnight.) Yes No NA

115.141 (d)

- Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: Whether the detainee has a mental, physical, or developmental disability? (N/A if lockup is NOT used to house detainees overnight.) Yes No NA
- Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The age of the detainee? (N/A if lockup is NOT used to house detainees overnight.) Yes No NA
- Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The physical build and appearance of the detainee? (N/A if lockup is NOT used to house detainees overnight.) Yes No NA
- Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: Whether the detainee has previously been incarcerated? (N/A if lockup is NOT used to house detainees overnight.) Yes No NA
- Does the screening process in the lockups described in paragraph (b) of this section consider, to the extent that the information is available, the following criteria to screen detainees for risk of sexual victimization: The nature of the detainee's alleged offense and criminal history? (N/A if lockup is NOT used to house detainees overnight.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.141 (a): According to GEO policy 5.1.2-C, paged 7 & 8, section D, b-e, if a lockup is utilized to house detainees overnight, all detainees will be screened to assess their risk of being sexually abuse by other detainees or sexually abusive towards other detainees. The Montebello City Jail houses detainees overnight.

115.141 (b): The facility uses GEO's *PREA Risk Assessment – Lockups* objective screening tool to assess detainees risk of being sexually abused by other detainees or sexually abusive towards other detainees.

115.141 (c): The screening tool includes the staff asking detainees about his or her own perception of vulnerability.

115.141 (d): The *PREA Risk Assessment – Lockups* form was reviewed and found to include the following criteria:

1. Whether the detainee has a mental, physical or developmental disability;
2. The age of the detainee;
3. The physical build and appearance of the detainee
4. Whether the detainee has previously been incarcerated; and
5. The nature of the detainee’s alleged offense and criminal history.

According to information provided on the Pre-Audit Questionnaire, in the past 12 months 495 detainees who were held overnight at the Montebello City Jail were screened for their risk of sexual victimization or risk of sexually abusing other detainees. In interview with staff responsible for initial risk screenings of detainees and in review of detainee records, *PREA Risk Assessments* are being completed as required.

REPORTING

Standard 115.151: Detainee reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.151 (a)

- Does the agency provide multiple internal ways for detainees to privately report: Sexual abuse and sexual harassment? Yes No
- Does the agency provide multiple internal ways for detainees to privately report: Retaliation by other detainees or staff for reporting sexual abuse and sexual harassment? Yes No
- Does the agency provide multiple internal ways for detainees to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents? Yes No

115.151 (b)

- Does the agency also provide at least one way for detainees to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? Yes No
- Is that private entity or office able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials? Yes No
- Does that private entity or office allow the detainee to remain anonymous upon request? Yes No

115.151 (c)

- Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties? Yes No
- Do staff members promptly document any verbal reports of sexual abuse and sexual harassment? Yes No

115.151 (d)

- Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of detainees? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.151 (a): Based on GEO policy 5.1.2-C, page 12, section L-1, each facility will provide multiple ways for detainees to privately report sexual abuse, sexual harassment, retaliation by other detainees or employees for reporting sexual abuse and sexual harassment and staff neglect or violation of responsibilities that may have contributed to such incidents. FM 1300.02, pages 5 & 6, section J, 1-4, addresses detainee-reporting options at the Montebello City Jail.

115.151 (b): Posters in English and Spanish inform detainees that they can tell a staff member in person or in writing or by third party anonymously. Detainees also have access to reporting to a public or private entity or office that is not part of the agency. They are informed they can contact the Victim Advocacy Services Hotline by calling 877-209-3049, a free and confidential 24-hour reporting hotline.

115.151 (c): Employees are to accept reports from detainees and third parties and document all reports promptly.

115.151 (d): Staff have access to private reporting by calling the Employee Hotline (866-568-5425) or the Corporate PREA Coordinator (561-999-5827). Information for resident and staff reporting was found on the GEO website (<https://www.geogroup.com/PREA>). *Third Party Reporting* posters informs employees of their responsibility of reporting sexual abuse and sexual harassment and their reporting options. Staff carry with them a Sexual Abuse First Responder Card, which has the employee hotline number and the website address for anonymous reporting. Staff interviewed knew how to privately report sexual abuse and sexual harassment of detainees.

Standard 115.154: Third-party reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.154 (a)

- Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment in its lockups? Yes No

- Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a detainee? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.254 (a): Based on GEO policy 5.1.2-C, page 12, section L-3, the agency has established a method to receive third-party reports of sexual abuse and sexual harassment on behalf of individuals in a GEO facility or program. Information on third party reporting is found on *Third Party Reporting* posters in areas visible to staff and visitors and is made available on the GEO website at [http://www.geogroup.com/PREA \(Social Responsibility-PREA Certification Section\)](http://www.geogroup.com/PREA (Social Responsibility-PREA Certification Section)). Third-party reports can be made in person, in writing, anonymously or by contacting the agency’s PREA Coordinator. Detainees interviewed were aware of this method of reporting.

In interview with the facility PREA Coordinator and on information reported on the Pre-Audit Questionnaire, during the past 12 months, there have been no reports of sexual abuse or sexual harassment made to the facility by a third party.

OFFICIAL RESPONSE FOLLOWING A DETAINEE REPORT

Standard 115.161: Staff and agency reporting duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.161 (a)

- Does the agency require 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 an agency lockup? Yes No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against detainees or staff who reported such an incident? Yes No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? Yes No

115.161 (b)

- Apart from reporting to designated supervisors or officials, do staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment and investigation decisions? Yes No

115.161 (c)

- If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws? Yes No

115.161 (d)

- Does the agency report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the agency's designated investigators? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.161 (a): The agency's requirement on staff reporting duties can be found on pages 12 & 13, section L-3 of GEO policy 5.1.2-A and on pages 6 & 7, section L of FM 1300.02. All staff are required to report immediately any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment and any retaliation against residents or staff who reported such an incident and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All allegations of sexual abuse and sexual harassment, including third party and anonymous reports, are reported to the On-Duty Watch Commander, the Support Services Manager and the Jail Administrator. Staff interviewed knew their responsibility of reporting and to whom to report.

115.161 (b): Apart from reporting to designated supervisors, staff are not to reveal any information related to a sexual abuse report to anyone.

115.161 (c): If the alleged victim is under the age of 18 or considered a vulnerable adult under state statute, GEO will report the allegation to the designated state or local services agency under applicable mandatory reporting laws. The Montebello City Jail houses adult male detainees only, none of whom according to their classified level of care are considered vulnerable adults under the California State Vulnerable Persons Statute; therefore, this provision of this standard is not applicable to this facility.

115.161 (d): The Watch Commander is to report to the facility investigator all allegations of sexual abuse, harassment, retaliation, neglect or violations leading to sexual abuse, harassment or retaliation, including third party and anonymous reports.

Standard 115.162: Agency protection duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.162 (a)

- When the agency learns that a detainee is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the detainee? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.162 (a): When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the detainee according to GEO policy 5.1.2-C, pages 12 & 13, section L-3 and page 7, section n M-1 of FM 1300.02. All allegations of sexual abuse are to be handled in a confidential manner and conversations with the victim sensitive, supportive and non-judgmental.

In interview with the Jail Administrator, as well as documentation provided in the Pre-Audit Questionnaire, there were no times during the past 12 months that it was necessary for the facility to take immediate action in regards to a resident being in substantial risk of sexual abuse. Staff interviewed knew what to do if they felt a detainee was in risk of sexual abuse.

Standard 115.163: Reporting to other confinement facilities

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.163 (a)

- Upon receiving an allegation that a detainee was sexually abused while confined at another facility, does the head of the lockup that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred? Yes No

115.163 (b)

- Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation? Yes No

115.163 (c)

- Does the agency document that it has provided such notification? Yes No

115.163 (d)

- Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.163 (a): GEO policy 5.1.2-C, page 15, section 4 and FM 1300.02, page 6, section K-7, were used to verify compliance to this standard. Upon receiving an allegation that a resident was sexually abused while confined at another facility, the Watch Commander will notify the head of the facility where the sexual abuse was alleged to have occurred or the appropriate office of the agency where the alleged abuse occurred.

115.163 (b): This notification is to occur as soon as possible, but no later than 72 hours of receiving the allegation.

115.163 (c): The Watch Commander will document that notification was made and include all actions taken regarding the incident. Copies of this documentation will be forwarded to the facility PREA Compliance Manager and the agency PREA Coordinator.

115.163 (d): The facility ensures that the allegation be investigated in accordance with the PREA standards.

In interview with the Jail Administrator and in information provided on the Pre-Audit Questionnaire, there were no allegations of sexual abuse received from other facilities.

Standard 115.164: Staff first responder duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.164 (a)

- Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement staff member to respond to the report required to: Separate the alleged victim and abuser? Yes No
- Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? Yes No
- Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement staff member to respond to the report required to: 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, if the abuse occurred within a time period that still allows for the collection of physical evidence? Yes No

- Upon learning of an allegation that a detainee was sexually abused, is the first law enforcement staff member to respond to the report required to: 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 abuse occurred within a time period that still allows for the collection of physical evidence? Yes No

115.164 (b)

- If the first staff responder is not a law enforcement staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify law enforcement staff? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.164 (a): GEO policy 5.1.2-C, pages 13 & 14, section M-2 and FM 1300.02, pages 7 & 8, section M, outline the procedures for first responders to follow for allegations of sexual abuse and sexual harassment whether that person is a security or non-security staff member.

Per policy, upon learning of an allegation of sexual abuse, the first officer to respond to the report is to separate the alleged victim and abuser, immediately notify the Watch Commander, Jail Administrator, Operations Manager and PREA Compliance Manager. First responders are to preserve and protect the crime scene, not let the alleged victim or abuser take any actions that could destroy physical evidence if the abuse occurred in a time that still allows for the collection of physical evidence; and not reveal to anyone information related to the incident other than staff involved with investigating the alleged incident.

115.164 (b): If the first responder is not an officer, the responder is to request that the alleged victim not take any actions that could destroy physical evidence and notify law enforcement staff.

All staff carry with them a Sexual Abuse First Responder Card affixed to their badges reminding them of the steps to take if they are the first responders to an allegation of sexual abuse and trained on first responder duties.

Interviews Jail Officers revealed that they knew the policy and procedures to follow if they were the first responder to an allegation of sexual abuse. They reported that they knew that the alleged victim and abuser must be separated and how to preserve the crime scene and physical evidence. In information provided on the Pre-Audit Questionnaire and in interview with the Jail Administrator, in the past 12 months there were no allegations of sexual abuse reported so it was not necessary to implement first responder duties.

Standard 115.165: Coordinated response

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.165 (a)

- Has the agency developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to a lockup incident of sexual abuse? Yes No
- If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law and unless the victim requests otherwise, inform the receiving facility of the incident and the victim's potential need for medical or social services? Yes No

115.165 (b)

- If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law, inform the receiving facility of the incident unless the victim requests otherwise? (N/A if the agency is not permitted by law to inform a receiving facility, where a victim is transferred from the lockup to a jail, prison, or medical facility as a result of an allegation of sexual abuse of the incident and the victim's potential need for medical or social services.) Yes No NA
- If a victim is transferred from the lockup to a jail, prison, or medical facility, does the agency, as permitted by law, inform the receiving facility of the victim's potential need for medical or social services unless the victim requests otherwise? (N/A if the agency is not permitted by law to inform a receiving facility, where a victim is transferred from the lockup to a jail, prison, or medical facility as a result of an allegation of sexual abuse of the incident and the victim's potential need for medical or social services.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.165 (a): GEO policy 5.1.2-C, page 5, section A-4 and in review of the *Montebello PREA Coordinated Response Plan* were used to verify that there is a plan in place to coordinate actions to be taken in response to an incident of sexual abuse and sexual harassment. It is the responsibility of the Jail Administrator and the Ranking On-Duty Officer to ensure compliance to the plan.

115.165 (b): If the victim is transferred from the lockup to the jail, prison or medical facility, the facility shall, as permitted by law, inform the receiving facility of the incident (in writing) and the victim's potential need for medical or social services, unless the victim requests otherwise.

In an interview with the Jail Administrator, she knew her responsibility to ensure the PREA Coordinated Response Plan be carried out when there is an allegation of sexual abuse reported. On information provided in the Pre-Audit Questionnaire, in the past 12 months there were no allegations of sexual abuse reported.

Standard 115.166: Preservation of ability to protect detainees from contact with abusers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.166 (a)

- Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any detainees pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted? Yes No

115.166 (b)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.166 (a): Based on GEO policy 5.1.2-C, page 5, section A-3, in all cases where the alleged abuser is an employee, there will be no contact allowed between an alleged abuser and an alleged victim pending the outcome of an investigation.

115.166 (b): The Montebello City Jail does not have a collective bargaining agreement. GEO would not enter into a collective bargaining agreement or other agreements that would limit the agency's ability to remove an alleged staff sexual abuser from contact with a detainee pending the outcome of an investigation.

Standard 115.167: Agency protection against retaliation

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.167 (a)

- Has the agency established a policy to protect all detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff? Yes No

- Has the agency designated which staff members or departments are charged with monitoring retaliation? Yes No

115.167 (b)

- Does the agency employ multiple protection measures, such as housing changes or transfers for detainee victims or abusers, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for detainees or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations? Yes No

115.167 (c)

- Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Monitor the conduct and treatment of detainees or staff who have reported sexual abuse? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Monitor the conduct and treatment of detainees who were reported to have suffered sexual abuse? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, does the agency: Act promptly to remedy any such retaliation? Yes No

115.167 (d)

- If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?
 Yes No

115.167 (e)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.167 (a): GEO has as policy to protect detainees who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff as outlined in policy 5.1.2-C, pages 16 & 17, section N-1 and in FM 1300.02, pages 8 & 9, section O, 5-13.

115.167 (b): The Watch Commander or the authorized designee shall employ multiple protection measures, such as housing changes or transfers for detainees, victims or abusers, removal of alleged staff or detainee abusers from contact with victims and emotional support services for detainees or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. If any other individual who cooperates with an investigation expresses a fear of retaliation, appropriate measures to protect that individual against retaliation will be put in place.

115.167 (c): The Jail Administrator or the on-duty senior officer is responsible for weekly monitoring of detainees and staff who reported sexual abuse or sexual harassment. Monitoring will also include periodic status checks. If retaliation was suspected, the Jail Administrator will act promptly to remedy the retaliation.

115.167 (d): If another individual who cooperates with sexual abuse or sexual harassment investigation expresses a fear of retaliation, appropriate measures would be taken to protect that individual against retaliation.

INVESTIGATIONS

Standard 115.171: Criminal and administrative agency investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.171 (a)

- When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? [N/A if the agency/lockup is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.121(a).] Yes No NA
- Does the agency conduct such investigations for all allegations, including third party and anonymous reports? [N/A if the agency/lockup is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.121(a).] Yes No NA

115.171 (b)

- Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.134? Yes No

115.171 (c)

- Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data? Yes No
- Do investigators interview alleged victims, suspected perpetrators, and witnesses? Yes No

- Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator? Yes No

115.171 (d)

- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? Yes No

115.171 (e)

- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as detainee or staff?
 Yes No
- Does the agency investigate allegations of sexual abuse without requiring a detainee who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? Yes No

115.171 (f)

- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? Yes No
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? Yes No

115.171 (g)

- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? Yes No

115.171 (h)

- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?
 Yes No

115.171 (i)

- Does the agency retain all written reports referenced in 115.171(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years? Yes No

115.171 (j)

- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the lockup or agency does not provide a basis for terminating an investigation?
 Yes No

115.171 (k)

- Auditor is not required to audit this provision.

115.171 (l)

- When an outside entity investigates sexual abuse, does the agency cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? [N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.121(a).] Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.171 (a): According to GEO policy 5.1.2-C and the FM 1300.02, page 11, section U. The department will promptly and objectively investigate all allegations, including third party and anonymous reports, of sexual abuse and sexual harassment. Only trained investigators will conduct sexual abuse investigations.

115.171 (b): The Jail Administrator is the trained facility investigator and documentation maintained by the facility shows that he completed the *PREA Specialized Investigators Training* on 6/21/18.

115.171 (c): All allegations of sexual abuse and sexual harassment will be referred to the Montebello Police Department who conduct investigations. The police department will gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data, shall interview alleged victims, suspected perpetrators and witnesses and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.

115.171 (d): When the quality of evidence appears to support criminal prosecution, the Montebello Policy Department Investigators will conduct compelled interview only after consulting with prosecutors.

115.171 (e): The credibility of an alleged victim, suspect or witness shall be assessed on an individual basis and shall not be determined by the person's status as a detainee or staff. A detainee who alleges sexual abuse will not be required to submit to a polygraph test.

115.171 (f): The administrative investigation will include an effort to determine whether staff actions or failures to act contributed to the abuse. The administrative investigation shall be documented in a written report and include a description of the physical and testimonial evidence, the reasoning behind credibility assessments and investigative facts and findings.

115.171 (g): A criminal investigation shall be documented in a written report that contains a thorough description of physical, testimonial and documentary evidence. The facility shall request a copy of completed investigative reports.

115.171 (h): Substantiated allegations of conduct that appears to be criminal shall be referred to the District Attorney for prosecution.

115.171 (i): The agency will retain all written reports as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

115.171 (j): The departure of an alleged abuser or victim from employment or control of the facility or agency shall not provide a basis for terminating an investigation.

Standard 115.172: Evidentiary standard for administrative investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.172 (a)

- Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.172 (a): The agency will impose no standard higher than the preponderance of evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Based on GEO policy 5.1.2-E, page 6, section B-2-d and FM 1300.02, page 11, section U-6, the Chief of Police or City Manager will review a completed investigation and determine whether any allegations of sexual abuse or sexual harassment have been substantiated by a preponderance of the evidence.

DISCIPLINE

Standard 115.176: Disciplinary sanctions for staff

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.176 (a)

- Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies? Yes No

115.176 (b)

- Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse? Yes No

115.176 (c)

- Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) 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? Yes No

115.176 (d)

- Are 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, reported to: Law enforcement agencies unless the activity was clearly not criminal? Yes No
- Are 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, reported to: Relevant licensing bodies? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.176 (a): Employees shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse policy as outlined in policy GEO policy 5.1.2-E, page 11, section L-1 and in FM 1300.02, page 13, section X.

115.176 (b): Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

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

115.176 (d): All terminations for violations of the agency's policies on sexual abuse and sexual harassment, or resignations, are reported to law enforcement and licensing agencies unless the activity was clearly not criminal.

In interview with the Jail Administrator and in information provided on the Pre-Audit Questionnaire, in the past 12 months, there were no staff members disciplined for violating the agency/facility's sexual abuse or sexual harassment policy.

Standard 115.177: Corrective action for contractors and volunteers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.177 (a)

- Is any contractor or volunteer who engages in sexual abuse prohibited from contact with detainees? Yes No
- Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies unless the activity was clearly not criminal? Yes No
- Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies? Yes No

115.177 (b)

- In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the lockup take appropriate remedial measures, and consider whether to prohibit further contact with detainees? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

The Montebello City Jail does not utilize the services of contractors and does not have volunteers; therefore, this standard is not applicable to this facility.

Standard 115.178: Referrals for prosecution for detainee-on-detainee sexual abuse

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.178 (a)

- When there is probable cause to believe that a detainee sexually abused another detainee in a lockup, does the agency refer the matter to the appropriate prosecuting authority?
 Yes No

115.178 (b)

- If the agency itself is not responsible for investigating allegations of sexual abuse, does the agency inform the investigating entity of this policy? (N/A if the agency/facility is responsible for administrative and criminal investigations. See 115.121(a).) Yes No NA

115.178 (c)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.178 (a): Based on GEO policy 5.1.2-C, page 17, section O-2 and FM 1300.02, page 13, section X-4, when there is probably cause to believe that a detainee sexually abused another detainee in a lockup, the allegation of conduct is referred to the District Attorney for possible prosecution.

According to information provided on the Pre-Audit Questionnaire and in interview with the Jail Administrator, in the past 12 months there have been no allegations reported that a detainee sexually abused another detainee.

MEDICAL AND MENTAL CARE

Standard 115.182: Access to emergency medical and mental health services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.182 (a)

- Do detainee victims of sexual abuse in lockups receive timely, unimpeded access to emergency medical treatment? Yes No

115.182 (b)

- Are treatment services 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?
 Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.182 (a): Based on GEO policy 5.1.2-C, pages 15 & 16, section 5 and FM 1300.02, page 6, section K-9, detainee victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment.

115.182 (b): 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.

In interview with the Jail Administrator and in information provided on the Pre-Audit Questionnaire, there were no allegations of sexual abuse reported in the past 12 months and therefore, no emergency medical or mental health services were required.

DATA COLLECTION AND REVIEW

Standard 115.186: Sexual abuse incident reviews

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.186 (a)

- Does the lockup conduct 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? Yes No

115.186 (b)

- Does such review ordinarily occur within 30 days of the conclusion of the investigation?
 Yes No

115.186 (c)

- Does the review team include upper-level management officials, with input from line supervisors and investigators? Yes No

115.186 (d)

- Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse? Yes No
- Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the lockup? Yes No
- Does the review team: Examine the area in the lockup where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse? Yes No
- Does the review team: Assess the adequacy of staffing levels in that area during different shifts? Yes No
- Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff? Yes No
- Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.186(d)(1) - (d)(5), and any recommendations for improvement and submit such report to the lockup head and agency PREA coordinator? Yes No

115.186 (e)

- Does the lockup implement the recommendations for improvement, or document its reasons for not doing so? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.186 (a): According to GEO policy 5.1.2-C, page 17, section N-2 and FM 1300.02, page 12, section V, the facility is required to conduct a sexual abuse at the conclusion of every sexual abuse investigation of every sexual abuse investigation in which the allegation has been determined to be substantiated or unsubstantiated.

115.186 (b): The review will occur within 30 days of the conclusion of the investigation.

115.186 (c): The PREA Compliance Manager and the Jail Administrator make up the facility's Incident Review Team, the PREA Coordinator may be consulted as part of the review.

115.186 (d): The team considers whether the incident was motivated by race, ethnicity, gender identity, perceived status or gang affiliation. The team examines the area where the incident alleged to have occurred and assesses whether physical barriers in the area may have contributed to the

abuse, whether monitoring technology should be deployed or augmented and whether the staffing levels at the time of the incident were adequate.

Incident reviews are documented on a *PREA After Action Review Report* (attachment J) and forwarded to the Chief of Police and the PREA Coordinator no later than 10 working days after the review. The Jail Administrator maintains copies of all completed *PREA After Action Review Reports* and a copy is retained in the corresponding investigative file.

115.186 (e): The Chief of Police or the authorized designee will implement the recommendations for improvement, or document its reasons for not doing so.

In interview with the PREA Compliance Manager and the Jail Administrator, in the past 12 months, there were no allegations of sexual abuse reported. When interviewed, the PREA Compliance Manager and the Jail Administrator knew their responsibilities as they relate to the review of sexual abuse incidents.

Standard 115.187: Data collection

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.187 (a)

- Does the agency collect accurate, uniform data for every allegation of sexual abuse at lockups under its direct control using a standardized instrument and set of definitions? Yes No

115.187 (b)

- Does the agency aggregate the incident-based sexual abuse data at least annually? Yes No

115.187 (c)

- Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Local Jail Jurisdictions Survey of Sexual Violence conducted by the Department of Justice, or any subsequent form developed by the Department of Justice and designated for lockups? Yes No

115.187 (d)

- Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews? Yes No

115.187 (e)

- Does the agency also obtain incident-based and aggregated data from every private lockup with which it contracts for the confinement of its detainees? (N/A if agency does not contract for the confinement of its detainees.) Yes No NA

115.187 (f)

- Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)
 Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.187 (a) & (c): In review of GEO policy 5.1.2-C, pages 17 & 18, section P and FM 1300.02, page 12 & 13, section W, GEO collects accurate uniform data for every allegation of sexual abuse at lockups under its direct control. The PREA Compliance Manager ensures that the data is compiled and forwarded to the PREA Coordinator on a monthly basis on the *Monthly PREA Incident Tracking Log* (attachment K). In addition to submitting the *Monthly PREA Incident Tracking Log*, the Jail Administrator is to ensure that a PREA Survey is created, updated and submitted for review and approval in the PREA Portal for every allegation of sexual abuse, sexual harassment and sexual activity.

The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the Local Jail Jurisdictions Survey of Sexual Violence conducted by the Bureau of Justice Statistics (BJS).

115.187 (b): GEO aggregates the incident-based sexual abuse data at least annually.

115.187 (d): GEO maintains, reviews and collects data as needed from available incident-based documents, including reports, investigation files and sexual abuse incident reviews.

115.187 (e): This provision of the standard is not applicable to this facility. GEO does not contract for the confinement of its detainees.

115.187 (f): Upon request, GEO will provide all data from the previous calendar year to the Department of Justice no later than June 30.

Standard 115.188: Data review for corrective action

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.188 (a)

- Does the agency review data collected and aggregated pursuant to § 115.187 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas? Yes No
- Does the agency review data collected and aggregated pursuant to § 115.187 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response

policies, practices, and training, including by: Taking corrective action on an ongoing basis?
 Yes No

- Does the agency review data collected and aggregated pursuant to § 115.187 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each lockup, as well as the agency as a whole? Yes No

115.188 (b)

- Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse Yes No

115.188 (c)

- Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means? Yes No

115.188 (d)

- Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a lockup? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.188 (a): Based on GEO policy 5.1.2-C, page 18, section P-2, FM 1300.02, page 12, section W, 5-7 and on interview with the PREA Coordinator, the agency reviews all of the data collected from all of its facilities and aggregates that data annually to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies, practices and training. The PREA Coordinator stated that a database program is used at the corporate level and monitored by a Data Specialist.

115.188 (b): The PREA Coordinator reviews the data collected to identify problem areas, take corrective action on an ongoing basis and prepare an annual report of the findings and corrective actions for each facility and the agency as a whole. The report includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. The Annual PREA Report provides an excellent overview of the agency's efforts in the prevention of sexual abuse and sexual harassment in its facilities and therefore, exceeds in the requirements of this standard.

115.188 (c): The PREA Coordinator forwards the annual report to the Senior Vice President of US Corrections for his signature and approval. The report is then made public on the GEO website at <https://www.geogroup.com/PREA>. The most recent report for 2017 data was found posted on the agency's website.

115.188 (d): The PREA Coordinator redacts specific material from the reports and indicates the nature of the material redacted.

Standard 115.189: Data storage, publication, and destruction

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.189 (a)

- Does the agency ensure that data collected pursuant to § 115.187 are securely retained?
 Yes No

115.189 (b)

- Does the agency make all aggregated sexual abuse data, from lockups under its direct control and private agencies with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means? Yes No

115.189 (c)

- Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available? Yes No

115.189 (d)

- Does the agency maintain sexual abuse data collected pursuant to § 115.187 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.189 (a): GEO ensures that data collected pursuant to standard 115.187 are securely retained. In interview with the PREA Coordinator, the data that is retained in the database program has restricted access. The PREA Compliance Managers and facility investigators have access to their facility's information only.

115.189 (b): GEO makes all aggregated sexual abuse data, from facilities under its direct control readily available to the public annually on their website at <https://www.geogroup.com/PREA>.

115.189 (c): Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.

115.189 (d): All data collected is securely retained for at least 10 years after the date of the initial collection unless federal state or local law requires otherwise.

AUDITING AND CORRECTIVE ACTION

Standard 115.401: Frequency and scope of audits

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.401 (a)

- During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (*Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.*) Yes No

115.401 (b)

- Is this the first year of the current audit cycle? (*Note: a "no" response does not impact overall compliance with this standard.*) Yes No
- If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is **not** the *second* year of the current audit cycle.) Yes No NA
- If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is **not** the *third* year of the current audit cycle.) Yes No NA

115.401 (h)

- Did the auditor have access to, and the ability to observe, all areas of the audited facility? Yes No

115.401 (i)

- Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)? Yes No

115.401 (m)

- Was the auditor permitted to conduct private interviews with inmates, detainees, and detainees?
 Yes No

115.401 (n)

- Were detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.401 (a): Based on GEO policy 5.1.2-C, page 18, section Q, during the three-year period starting on August 20, 2013, and each three-year period thereafter, GEO's Contract Compliance Department ensures that a PREA auditor who has been certified through the Department of Justice audits each facility at least once. The Montebello City Jail's initial PREA audit was in May 2015 by a DOJ certified PREA auditor. This audit, conducted three years after the initial PREA audit, was conducted by me, a DOJ certified PREA auditor.

115.401 (b): According to GEO's PREA Coordinator, during the three-year period beginning on August 20, 2013, GEO ensured that each of its facilities were audited at least once and continues to ensure that its facilities are audited every three years.

115.401 (f): I received and reviewed all relevant agency-wide policies and procedures during the on-site audit phase and while on-site.

115.401 (g): I reviewed a sampling of relevant documents and other records and information for the most recent one-year period.

115.401 (h): During the audit, I was allowed access to all areas of the Montebello City Jail.

115.401 (i): I was permitted to request and received copies of relevant documentation.

115.401 (j): I have retained all documentation relied upon to make audit determinations. The documentation will be provided to the Department of Justice upon request.

115.401 (k): I interviewed all staff that were scheduled to work during the on-site audit and the one detainee assigned to the Montebello City Jail.

115.401 (l): I reviewed camera monitors with the Jail Administrator.

115.401 (m): I was permitted to conduct private interviews with detainees and staff in an area that ensured confidentiality to our conversation.

115.401 (n): Detainees were notified six weeks prior to the onsite audit on posted facility notices in English and Spanish that they could send confidential correspondence to me and were given my name and mailing address. I did not receive any correspondence from detainees of the Montebello City Jail.

Standard 115.403: Audit contents and findings

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.403 (f)

- The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single lockup agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

115.403 (a): In compliance with the National PREA Standards, I certify by my signature in the *Auditor's Certification* Section of this report that no conflict of interest exists with my ability to conduct this audit.

115.403 (b): In thorough review of GEO's policies, as well as facility policies and procedures were found to comply with relevant PREA standards.

115.403 (c): For each PREA standard, I made a determination of a finding of Exceeds Standard, Meets Standard or Does Not Meet Standard. See page 6 for a summary of my audit findings for each of the PREA standards.

115.403 (d): This report describes the methodology, sampling sizes and basis for my conclusions as required.

115.403 (e): I have redacted any personal identifiable resident or employee information, but I can provide such information to GEO or the Department of Justice upon request.

115.403 (f): Per agency policy and standard requirements, GEO ensures me that this final report will be published on their website at (<https://www.geogroup.com/PREA>) to be available to the public

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.

Barbara Jo Denison

August 27, 2018

Auditor Signature

Date