

PREA AUDIT: AUDITOR'S SUMMARY REPORT

LOCKUPS



Name of facility: Alhambra City Jail			
Physical address: 211 S. First Street Alhambra, CA 91801			
Date report submitted: May 22, 2015			
Auditor Information		Katherine Brown	
Address:	12121 Little Road Suite 286 Hudson, Florida 34667		
Email:	kbrown2828@yahoo.com		
Telephone number:	727-470-4123		
Date of facility visit: May 18, 2015			
Facility Information			
Facility mailing address:	SAA		
Telephone number:	626-570-5171		
Alhambra City Jail is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input checked="" type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input checked="" type="checkbox"/> Police Lockup	<input type="checkbox"/> Sheriff	<input type="checkbox"/> Court Holding <input type="checkbox"/> Other
Name of PREA Compliance Manager:	Art Hernandez	Title:	Jail Administrator
Email address:	arthernandez@geogroup.com	Telephone number:	626-570-5171
Agency Information			
Name of agency:	The GEO Group		
Governing authority or parent agency:			
Physical address:	One Park Place, Suite 700, 621 Northwest 53 rd Street, Boca Raton Florida 33487		
Mailing address	SAA		
Telephone number:	561-999-5827		
Agency Chief Executive Officer			
Name: George C. Zoley	Title:	Chairman of the Board, CEO and Founder	
Email address:	gzoley@geogroup.com	Telephone number:	561-893-0101
Agency-Wide PREA Coordinator			
Name:	Phebia L. Moreland	Title:	Director, Contract Compliance, PREA Coordinator
Email address:	pmoreland@geogroup.com	Telephone	561-999-5877

AUDIT FINDINGS

NARRATIVE:

The audit of Alhambra City Jail was conducted on May 18, 2015 by Katherine Brown, Certified PREA auditor. The areas toured were a total of 8 cells.

An entrance meeting was held with facility staff. The following people were in attendance: Art Hernandez, Jail Administrator; Steve Lechuga, Director of Operations; Phebia Moreland, PREA Coordinator and Dawn Zobel, Assistant Director Regional Operations/Regional PREA Coordinator.

Following the entrance meeting I toured the lockup, on the tour with me was, Art Hernandez, Jail Administrator; Steve Lechuga, Director of Operations.

The population the day of the audit was a total of 6 detainees, there were five males and one female. I interviewed 5 male detainees, one refused and I interviewed the one female detainee. There were no limited English speaking or hearing/vision impaired detainees to be interviewed. I also asked for any detainee who was transgender/intersex, there were none. There are a total of 10 staff assigned to the lockup, I conducted 4 interviews: 2 on day shift and I did a telephone interview of the 2 on the evening shift. I also conducted all the specialized interviews.

There were no sexual assault/harassment allegation cases reported.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Alhambra City Jail is located at 211 S. First Street Alhambra, CA 91801. It is a 44 bed lockup that consist of 8 cells. Two of the cells are tanks that contain 10 beds where the detainees share a common dayroom and 6 cells with four bunks. The City Jail provides services to the cities of So Pasadena; San Gabriel and Alhambra. Detainee population is male & female awaiting arraignment date. Detainee's stay is 24 -72 hours. The average monthly arrest are 175-200 detainees. Alhambra City Jail also contracts with the United State Marshals and ICE to provide short term incarceration. Alhambra has a pay to stay program that allows sentenced detainees to pay \$100.00 per day, by court order to stay on the weekends.

The mission of the Alhambra Police Department is to prevent crime, to protect lives and property, preserve the peace and order in the community and build positive relationships with the community we serve.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 2

Number of standards met:

28

Number of standards not met:

Number of standards not applicable: 3

**Standard
number
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**§115.111 - Zero tolerance of sexual abuse and sexual harassment; PREA
coordinator**

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

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

Reviewed Corporate Policy 5.1.2 Section I Zero Tolerance; 5.1.2. C. III Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 4 F PREA Policy; Corporate Organizational Chart; Los Angeles Jails Organization Chart. Based on interviews with PREA Coordinator and PREA compliance manager.

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

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

**Standard
number
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115.112 Contracting with other agencies for confinement of detainees

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

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

Reviewed 5.1.2. C. pg. 5 #5 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 7 N PREA Policy. Based on interview with agency's contract compliance manager.

There have been no new contract renewals.

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

Standard number here	115.113 Supervision and monitoring
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 6 C PREA policy; Field Policy Manual (FM) 1300.02 O 1-3 PREA Policy; Annual PREA Assessment; Staffing Roster. Based on interview with Jail Administrator and PREA Coordinator.

The GEO Group has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect detainees against sexual abuse.

In circumstances where the staffing plan was not complied with, Alhambra City Jail documented and justified all deviations from the plan.

The GEO Group completes an annual review, in consultation with the PREA coordinator required by § 115.111, to assess, determine, and document whether adjustments are needed.

Standard number here	115.114 Youthful detainees
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)
- Not applicable standard

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

No juveniles are held at Alhambra City Jail.

**Standard
number
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115.115 Limits to cross gender viewing and searches

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

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

Reviewed Field Policy Manual (FM) 900.03 1 (a-d) Strip Search Policy; FM 1700.01 #5 Grooming Hygiene; 2014 Lesson Plan.

Alhambra City Jail does not conduct cross-gender strip searches or cross-gender visual body cavity searches. If a female staff member is not on duty at the lockup the Records or Dispatch department for the Alhambra Police Department is contacted to respond to the lockup to conduct the search. All of the dispatchers and records personnel have been trained in how to conduct searches.

Alhambra City Jail has 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. Such policies and procedures require staff of the opposite gender to announce their presence when entering a detainee housing unit.

Alhambra City Jail does not search or physically examine a transgender or intersex detainee for the sole purpose of determining the detainee's genital status. If the detainee's genital status is unknown, it is determined during conversations with the detainee.

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

**Standard
number
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115.116 Detainees with disabilities and limited English speaking

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

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

Reviewed 5.1.2. C. pg. 8 E PREA policy; Field Policy Manual (FM) 1300.02 R PREA Policy; Language line. Based on random detainee and staff interviews.

The GEO Group takes appropriate steps to ensure detainees with disabilities (including, for example, detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of The GEO Group’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

There have been no detainee interpreters, detainee readers, or other types of detainee assistants used at Alhambra City Jail.

Standard number here	115.117 Hiring and promotion decisions
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 7 #2 & pg. 11 #3 PREA policy; Field Policy Manual (FM) 1300.02 S PREA Policy; Staff roster; background checks; annual PREA Disclosure Waiver. Based on interview with Human Resource Director.

The Alhambra City Jail does not use contractors and no promotions have been made at Alhambra City Jail in the past year.

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

The GEO Group considers any incidents of sexual harassment in determining whether to hire or promote anyone.

The GEO Group performs a criminal background records check at least every five years of current employees.

Standard number here	115.118 Upgrades to facilities and technology
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 7 #3 PREA policy; Field Policy Manual (FM) 1300.02 pg. 4 F PREA Policy and review of camera locations. Based on interview of agency head and Jail Administrator.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, The GEO Group considers how such technology may enhance The GEO Group's ability to protect detainees from sexual abuse. There have been no substantial or modifications to existing facilities. Cameras have been installed in the housing units and are viewed from the control room monitors.

Standard number here	115.121 Evidence protocol and forensic medical exams
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. E pg. 6 D Corporate PREA Investigations; FM 1300.02 pg. 9 T. Based on interview with Jail Administrator.

To the extent The GEO Group is responsible for investigating allegations of sexual abuse; The GEO Group follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal

prosecutions. The GEO Group does not perform investigations, however they have staff trained in investigations.

Alhambra City Jail contacts Alhambra Police Department who contacts the fire department to respond to the jail. Several hospitals are in close proximity: San Gabriel Valley Medical Center; Alhambra Hospital and Los Angeles Detainee Reception Center.

The GEO Group offers all victims of sexual abuse access to forensic medical examinations, at one of the facilities listed above without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). San Gabriel Valley Medical Center provides a Victim Advocate at Los Angeles Medical Center. There is a victim Advocacy Services Hotline 877-209-3049 available to the detainees.

The Alhambra Police Department conducts all investigations and keeps the city jail informed as to the progress of the investigation.

**Standard
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115.122 Policies to ensure referrals of allegations for investigations

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

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

Reviewed 5.1.2 E. III. A PREA Investigation; FM 1300.02 pg. 10 U; posters; GEO website. Based on interview with Jail Administrator and investigator with Alhambra Police Department.

There have been no PREA incidents at Alhambra City Jail in the past year.

The GEO Group ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

The GEO Group has a policy that ensures allegations of sexual abuse or sexual harassment are referred to the Alhambra Police Department for investigation who has the legal authority to conduct criminal investigations. The GEO Group publishes such policy on its website www.geogroup.com. The GEO Group documents all such referrals.

**Standard
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115.131 Employee and volunteer training

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

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

Reviewed 5.1.2. C. pg. 9 F Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 4 G PREA Policy; staff roster and Employee Training Acknowledgment. Based on interview with random staff.

The GEO Group trains all employees who have contact with detainees on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;
- (2) The dynamics of sexual abuse and harassment in confinement settings, including which detainees are most vulnerable in lockup settings;
- (3) The right of detainees and employees to be free from retaliation for reporting sexual abuse or harassment;
- (4) How to detect and respond to signs of threatened and actual abuse;
- (5) How to communicate effectively and professionally with all detainees; and
- (6) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The GEO Group documents, through employee signature, those employees understand the training they have received.

Standard number here	115.132 Detainees, contractors and detainee worker notification of agency's zero tolerance
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 9 E. 2 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 5 I PREA Policy; Detainee pamphlet; Receipt of Detainee pamphlet; and PREA Risk Assessment. Based on interview with detainees.

During the intake process, employees notify all detainees of The GEO Group's zero tolerance policy regarding sexual abuse and sexual harassment.

Alhambra City Jail does not utilize detainee workers nor do they have contractors or volunteers.

Standard number here	115.134 Specialized training: Investigators
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 10 F. 2 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 4 H PREA Policy; Specialized Investigation Training Lesson Plan; GEO Employee Training Certificates. Based on interview with investigative staff.

In addition to the general training provided to all employees The GEO Group ensures that the in house investigators have received training in conducting investigations in confinement settings.

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

Standard number here	115.141 Screening for risk of victimization and abusiveness
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 8 D Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 5 J PREA Policy and PREA Risk Assessment. Based on interview with random detainees and intake staff responsible for screening.

The Alhambra City Jail lockup staff consider whether, based on the information before them, if a detainee may be at a high risk of being sexually abused and when appropriate takes necessary steps to mitigate any such danger to the detainee. Staff also asks the detainee about their own perception of vulnerability.

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

- (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.

**Standard
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115.151 Detainee reporting

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

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

Reviewed 5.1.2. C. pg. 12 K Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 5 K PREA Policy. Based on interviews with random staff and detainees.

The GEO Group provides multiple ways for detainees to privately report sexual abuse and sexual harassment, retaliation by other detainees or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

The GEO Group informs detainees of at least one way for detainees to report abuse or harassment to a public or private entity or office that is not part of The GEO Group, and that is able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials, allowing the detainee to remain anonymous upon request. Detainees can contact Rape, Abuse, Incest National network (RAINN) or San Gabriel Valley Medical Center.

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

The GEO Group provides a method for staff to privately report sexual abuse and sexual harassment of detainees.

Standard number here	115.154 Third party reporting
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2 C pg. 12 K 2 and GEO website posting.

The GEO Group has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of a detainee.

Standard number here	115.161 Staff and agency reporting duties
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Reviewed 5.1.2 C pg. 10 G. pg. 11 h and pg. 12 K; FM 1300.02 pg. 6 L; GEO website. Based on interviews with random staff and Jail Administrator.

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

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

If the alleged victim is considered a vulnerable adult under a State statute CA Penal Code 368 vulnerable person's statute, The GEO Group reports the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Alhambra City Jail reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Alhambra City Police Department's designated investigators.

Standard number here	115.162 Agency protection duties
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 13 L Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 7 M PREA Policy. Based on interviews with random staff, and Jail Administrator.

There have been no reported PREA Allegations.

Immediate action is taken to protect detainees when The GEO Group learns that a detainee is subject to a substantial risk of imminent sexual abuse.

Standard number here	115.163 Reporting to other confinement facilities
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 15 #4 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 6 #7 PREA Policy. Based on interview with agency head and Jail Administrator.

Upon receiving an allegation that a detainee was sexually abused while confined at another facility, the head of Alhambra City Jail that received the allegation notifies the

head of the facility or appropriate office where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented.

Standard number here	115.164 Staff first responder duties
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 13 L 2 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 7 M PREA Policy. Based on interview with security staff who are first responders, random staff.

Alhambra City Jail has had no reported PREA allegations.

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

The Alhambra Police Department is notified of all allegations of sexual abuse and respond to the jail to conduct the investigation.

Standard number here	115.165 Coordinated response
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. 5 #4 Corporate PREA policy; Coordinated Response Plan; PREA Incident Checklist. Based on interview with Jail Administrator.

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

Based on the detailed Coordinated Response Plan I find Alhambra City Jail exceeds in this standard.

Standard number here	115.166 Preservation of ability to protect detainees from contact with abusers
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)
- X Not applicable standard

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

Alhambra City Jail does not have collective bargaining.

Standard number here	115.167 Agency protection against retaliation
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 16 M Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 8 #5-9 PREA Policy. Based on interview with agency head and Jail Administrator.

Alhambra City Jail has had no reported PREA Allegations.

The GEO Group has 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, and designate which staff members or departments are charged with monitoring retaliation. Detainees that are victims of sexual abuse once they go out to the hospital they would be transported to the County Jail, if this was to occur Alhambra City Jail Lockup has a form that would go to the receiving facility identifying what occurred at their facility.

In the event a detainee was sexually abused while at the lockup, after they were taken to the local hospital for treatment and exam they would be transferred to the County Jail.

The GEO Group monitors the conduct and treatment of detainees or staff who reported the sexual abuse and of detainees who were reported to have suffered sexual abuse and acts promptly to remedy any such retaliation.

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

**Standard
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115.171 Criminal and administrative agency investigation

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

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

Reviewed 5.1.2. E pg. 4 B 1&2 corporate policy; Field Policy Manual (FM) 1300.02 pg. 10 U 2 PREA Policy. Based on interview with Alhambra Police Department investigative staff.

Alhambra City Jail has had no reported PREA allegations.

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

Where sexual abuse is alleged, The GEO Group uses investigators who have received special training in sexual abuse investigations. All investigations are conducted by the Alhambra Police Department.

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

When the quality of evidence appears to support criminal prosecution, The Alhambra Police Department conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as detainee or staff. No agency requires a detainee who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

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

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

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

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

The departure of the alleged abuser or victim from the employment or control of Alhambra City Jail does not provide a basis for terminating an investigation.

Standard number here	115.172 Evidentiary standard for administrative investigation
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. E pg. 4 B 1&2 corporate policy; Field Policy Manual (FM) 1300.02 pg. 10 U 2 PREA Policy. Based on interview with Alhambra Police Departments investigator.

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

**Standard
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115.176 Disciplinary sanctions for staff

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

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

5.1.2 C pg. 17 N Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 11 X PREA Policy; and Employee Handbook.

Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

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

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

**Standard
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115.177 Corrective action for contractors and volunteers

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

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

Reviewed 5.1.2. C. Corporate PREA policy; Field Policy Manual (FM) 1300.02 PREA Policy
Alhambra City Jail has no Volunteers or contractors.

Standard number here

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

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

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

Reviewed 5.1.2. C. pg. 17 N. 2 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg.11 X PREA Policy.

Alhambra City Jail has had no reported PREA allegations.

When there is probable cause to believe that a detainee sexually abused another detainee in a lockup, The GEO Group refers the matter to the Alhambra Police Department Investigations Division.

To the extent The GEO Group itself is not responsible for investigating allegations of sexual abuse, The GEO Group informs the investigating entity of this policy.

Standard number here

115.182 Access to emergency medical services

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

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

Reviewed 5.1.2. E. pg. 15 #5 corporate policy; Field Policy Manual (FM) 1300.02 pg. 9T PREA Policy.

Alhambra City Jail has had no reported PREA allegations.

Detainee victims of sexual abuse in lockups receive timely, unimpeded access to emergency medical treatment.

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

Standard number here	115.186 Sexual abuse incident reviews
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 16 #2 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 10 V PREA Policy; and PREA After Action Review Report. Based on interview with Jail Administrator, PREA compliance manager; incident review team.

Alhambra City Jail has had no reported PREA allegations.

Alhambra City Jail conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors and investigators.

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

A report is prepared of its findings, including but not necessarily limited to determinations made and recommendations for improvement and submits the report to the lockup head and agency PREA coordinator.

The lockup will implement the recommendations for improvement, or documents its reasons for not doing so.

Based on the After Action Review Report form addressing all elements of the standard I find Alhambra City Jail exceeds this standard.

Standard number here	115.187 Data collection
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 17 0 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 11 V PREA Policy; Monthly PREA Incident Tracking Log.

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

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

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

The GEO Group obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its detainees.

Standard number here	115.188 Data review for corrective action
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on interview with PREA coordinator.

Reviewed 5.1.2. C. pg. 17 O #2 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 11 W PREA Policy and GEO 2013 & 2014 Annual PREA Data Report.

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

Such reports includes a comparison of the current year’s data and corrective actions with those from prior years and provide an assessment of The GEO Group’s progress in addressing sexual abuse.

The GEO Group’s report is approved by The GEO Group head and made readily available to the public through its website www.geogroup.com/reporting/prea.

Standard number here	115.189 Data storage, publication and destruction
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- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed 5.1.2. C. pg. 17 O #2 Corporate PREA policy; Field Policy Manual (FM) 1300.02 pg. 11 W PREA Policy and GEO 2013 & 2014 Annual PREA Data Report.

The GEO Group makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or www.geogroup.com/reporting/prea.

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

AUDITOR CERTIFICATION:

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

Katherine Brown

Auditor Signature

May 22, 2015

Date