

**PREA AUDIT REPORT**     Interim     Final  
**ADULT PRISONS & JAILS**

**Date of report:** 24 September 2017

<b>Auditor Information</b>			
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<b>Telephone number:</b> 540-903-6457			
<b>Date of facility visit:</b> 24 – 26 May, 2017			
<b>Facility Information</b>			
<b>Facility name:</b> Big Spring Correctional Center			
<b>Facility physical address:</b> 1701 Apron Drive, Big Spring, TX 79720			
<b>Facility mailing address:</b> <i>(if different from above)</i> Same as above			
<b>Facility telephone number:</b> 432-264-0060			
<b>The facility is:</b>	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
<b>Facility type:</b>	<input checked="" type="checkbox"/> Prison	<input type="checkbox"/> Jail	
<b>Name of facility's Chief Executive Officer:</b> John Oliver			
<b>Number of staff assigned to the facility in the last 12 months:</b> 472			
<b>Designed facility capacity:</b> 3509			
<b>Current population of facility:</b> 3446			
<b>Facility security levels/inmate custody levels:</b> Low/In			
<b>Age range of the population:</b> 18-71			
<b>Name of PREA Compliance Manager:</b> Meagan Hodges		<b>Title:</b> PCM, CMC	
<b>Email address:</b> mhodges@geogroup.com		<b>Telephone number:</b> 432-268-1227	
<b>Agency Information</b>			
<b>Name of agency:</b> The GEO Group Inc.			
<b>Governing authority or parent agency:</b> <i>(if applicable)</i>			
<b>Physical address:</b> One Park Place, Suite 700, 621 Northwest 53 <sup>rd</sup> Street, Boca Raton, Florida 33487			
<b>Mailing address:</b> <i>(if different from above)</i> Same as above			
<b>Telephone number:</b> 561-999-5827			
<b>Agency Chief Executive Officer</b>			
<b>Name:</b> George C. Zoley		<b>Title:</b> Chairman of the Board, CEO and Founder	
<b>Email address:</b> gzoley@geogroup.com		<b>Telephone number:</b> 561-893-0101	
<b>Agency-Wide PREA Coordinator</b>			
<b>Name:</b> Phebia L. Moreland		<b>Title:</b> Director, Contract Compliance, PREA Coordinator	
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## AUDIT FINDINGS

### NARRATIVE

The PREA audit of the Big Springs Correctional Center was conducted on May 24 - 26, 2017 by Mr. David Haasenritter Certified PREA Auditor, assisted by Mr. Charles Kehoe, Certified PREA Auditor. Approximately four weeks prior to the audit, the auditors received the Pre-Audit Questionnaire and additional documents through a secure thumbdrive. The documents and questionnaire were well organized, highlighted, and tabbed. This along with providing the information four weeks in advance of the audit enabled the audit to move forward very efficiently. Documents included examples from 2015, 2016, and 2017. The night before the audit the institution provided a roster of all inmates housed at the institution; lists of inmates for specific categories to be interviewed; and a list of all staff by duty position and shifts that were used to identify inmates and staff to be interviewed (random and specific category).

The lead auditor contacted Just Detention International (JDI) in reference to any information previously submitted by inmates at the Big Springs Correctional Center and reviewed both the GEO website and Federal Bureau of Prisons (FBOP) website prior to the audit. The GEO website is very informative and one of the easiest to find PREA information of all agencies this auditor has audited. GEO PREA page is very informative and has information and links on: general information on PREA; agency zero tolerance policy; how to report; how employees can report; information on investigations; and where questions and inquiries can be forwarded to the PREA Coordinator (phone number, email, and mailing address). It also has a number of links to include: PREA standards; GEO basic and investigative PREA policies; GEO facility PREA audit reports; and GEO's current annual PREA Report.

Following the entrance meeting with staff, the auditors separated and each auditor toured two facilities on 24 May, and each toured the respective facilities they did not tour later during the audit. Each auditor toured all four facilities. While touring, random inmates and staff were informally interviewed (not counted in interview count) and questioned about their knowledge of PREA standards, procedures for reporting, services available and their responsibilities. All staff and inmates informally interviewed during the tour acknowledged receiving training and procedures for reporting sexual abuse, sexual harassment and/or retaliation for reporting. During the tour, the auditors reviewed staffing; logs; physical plant; sight lines; camera coverage; and tested the inmate phone system for reporting allegations and for emotional support services.

Following the initial tour, the auditors began the formal interviews, review of investigations, checking of cameras, and random checks of personnel, medical, and training records. A total of 66 staff was formally interviewed in the course of the audit (31 random, 6 contractor/volunteers, and 26 specialized staff). The PREA Coordinator was previously interviewed by this auditor during the audit cycle. Staff interviewed was well versed in their responsibilities in reporting sexual abuse, sexual harassment, and staff negligence; first responder duties; and evidence preservation. GEO has continued to build a culture of zero tolerance. Warden John Oliver was the most knowledgeable Warden the lead auditor has audited, and it was very obvious he was active in PREA.

A total of 85 inmates were formally interviewed: 85 random (at least one from each housing unit) interviews; and 16 inmates who were interviewed using the specialized interview sheets (LGBTI (6), non-English speaking (55); who disclosed sexual victimization during screening (1); and who reported sexual abuse while confined (1)). Majority of the inmates interviewed acknowledged receiving PREA training and written materials (posters, pamphlets, and inmate's handbooks) in a language they understand outlining the agencies zero tolerance policies towards sexual abuse; knew the reporting procedures; and reported staff of the opposite gender announced when entering a housing area. All inmates who were asked stated they felt safe at the institution. The auditors found the inmates very aware of PREA.

The auditors reviewed 11 investigations of sexual abuse and sexual harassment at Big Springs Correctional Center during the audit cycle. There were four inmate-inmate allegations: one inmate-on-inmate sexual harassment unsubstantiated; one inmate-on-inmate sexual harassment unfounded; and two inmate-on-inmate sexual abuse unsubstantiated.

There were seven staff-on-inmate allegations: one staff-on-inmate sexual harassment unsubstantiated; three staff-on-inmate sexual abuses unsubstantiated; and three staff-on-inmate sexual abuse unfounded.

One case was an assist for another facility that the inmate reported the incident while at Big Springs Correctional Center, but occurred at another facility.

When the on-site audit was completed, the auditors conducted an exit meeting. While the auditor could not give the institution a final finding, the auditors did provide a preliminary status of his findings. The auditor thanked GEO and Big Springs Correctional Center staff for their hard work and commitment to the Prison Rape Elimination Act.

During the interim report writing and corrective action period, the auditor reviewed modified policies, and additional documents.

## **DESCRIPTION OF FACILITY CHARACTERISTICS**

The Big Springs Correctional Center is comprised of four units and is located in Big Spring, Texas approximately 45 minutes east of Midland, Texas. The facility houses minimum security sentenced offenders for the Federal Bureau of Prisons. The design capacity totals 3509 beds and the inmate population totaled 3464 on the first day of the audit. There is a total of 275 multiple occupancy cells, 16 open bays, and 158 segregation cells. A contract with Correct Care Solutions (CCS) provides health care services to the Big Springs Correctional Center inmates.

The Airpark Unit is located on the former Webb Air Force Base. The administration building of the former air force base was converted into a correctional facility in 1991 with an expansion project in 1999 adding multiple-room housing. The area for the unit is approximately 14 acres, count on the first day was 640. The Airpark Unit consists of 13 buildings and maintains an independent laundry, food service, chaplaincy service, medical unit, recreation, library and education/vocational programs. The Airpark Unit does not have a Restrictive Housing Unit.

The Cedar Hill Unit is located adjacent to the Airpark Unit and encompasses a 24-acre area. The unit was mostly constructed in 1997-1998 and opened in June of 1998 with 520 beds. The unit has undergone several expansion projects increasing its total capacity to 1,059 beds which includes a 48-bed Restrictive Housing Unit. The count on the first day of the audit was 1,060. The facility consists of 11 buildings and provides for a full-service laundry, food service, medical department, chaplaincy, recreation and education/vocational programming.

The Flightline Unit is located on the West side of the former Webb Air Force Base and was constructed in 1994. The unit is situated on approximately 18 acres and was opened in February 1995 with 520 beds. Expansion projects in 2000, 2001, 2007 and 2009 increased the capacity to 1,490 beds, which includes a 259-bed Restrictive Housing Unit. The count on the first day of the audit was 1,466. The Flightline Unit maintains a full-service laundry, food service, chaplaincy, library, medical unit, recreation and education/vocational programs.

The Interstate Unit was formerly a 72-room Ramada Inn motel. The unit was converted into a short-term correctional facility in 1989. It has a capacity of 417 with inmates housed dormitory style with 6-12 inmates per room. The count on the first day of the audit was 298. The unit is situated on approximately 10 acres with a central area that is used for outside recreation. The unit has 10 buildings which provides for education/vocational programs, work, recreation and religious program opportunities. The unit includes a large hobby craft room, music room, indoor recreation area and three separate recreation yards.

The mission of the Big Springs Correctional Center is to ensure the BOP receives high quality, cost effective and comprehensive privately managed prison services. Big Springs Correctional Center shall accomplish the mission and perform the contractual obligations to the FBOP through the continued assessment and improvement of all areas of operation.

## **SUMMARY OF AUDIT FINDINGS**

On May 24 - 26, 2017, the on-site visit was completed. Three standards (115.15, 115.41, and 115.52) required corrective action. On July 31, 2017, the Big Springs Correctional Center was found in full compliance:

Number of standards exceeded: 5

Number of standards met: 36

Number of standards not met: 0

Number of standards not applicable: 2

### **Standard 115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator**

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO has very good written policies mandating zero tolerance towards all forms of sexual abuse and sexual harassment that outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The main PREA policies are GEO Policy 5.1.2, Sexual Abuse Behavior Prevention and Intervention Program (PREA); GEO Policy 5.1.2-A, Sexual Abuse Behavior Prevention and Intervention Program (PREA for Adult Prison, Jail, and Adult Community Confinement Facilities); and GEO Policy 5.1.2-E, Investigating Allegations of Sexually Abusive Behavior (PREA). Other agency policies supplement these main PREA policies. Big Springs Correctional Center Policy INM 12.005 Sexual Abuse/Assault Prevention and Intervention Program (PREA) is the facility supplement to implement PREA. Agency and facility policies and procedures were very well organized. It is clear to the auditor that the Prison Rape Elimination Act is part of the GEO fabric.

GEO employs an upper-level, agency-wide facility PREA Coordinator and a PREA Compliance Manager. Ms. Phebia Moreland is the PREA Coordinator. She is very knowledgeable of PREA standards and is one of the top PREA Coordinators I have met. Ms. Moreland has the authority to develop, implement, and oversee PREA compliance. She is very active in coordinating PREA, consistently sending updates to facilities, especially as FAQs are posted on the PREA website. She conducts training and meetings to keep unit PREA Compliance Managers up to date on any changes and best practices. She is consistently looking for ways to improve GEO's PREA program. The GEO organization chart demonstrates Ms. Moreland is in a position of authority. The auditor has observed her develop, implement and oversee compliance during this and other audits the auditor conducted. She indirectly supervises 115 compliance managers (Prisons and Jails, Community Corrections, Lockups, and Juveniles) through three regional corrections coordinators, one community corrections coordinator, and one juvenile coordinator. She often goes directly to the compliance managers to coordinate changes, provide updates, conduct training, and on-site during audits.

Ms. Megan Hodges is the Big Springs Correctional Center PREA Compliance Manager, who reports to the Warden for PREA. She was very knowledgeable of PREA standards and was actively involved in PREA activities at four facilities. Ms. Hodges claimed to have enough time to perform her PREA duties. She coordinates and conducts training, provides information at staff calls, contacts the GEO PREA Coordinators for clarification and guidance. Review of the organizational chart demonstrated she had the authority to coordinate the facility's efforts to comply with PREA. During the audit, it was obvious she had the freedom and authority to discuss issues with the Warden. She was clearly the best PREA Compliance Manager this auditor has audited this year, and one of the better PREA Compliance Manager this auditor has audited over the last four years based on her knowledge, facility program, span of control (four facilities), and facility PREA culture.

The auditor would like to note Warden John Oliver was also very active in his facility PREA operations. PREA is a way of daily operations and that starts from both GEO central office and the Warden. Warden Oliver is the most knowledgeable and hands on Warden with PREA that this auditor has audited.

### **Standard 115.12 Contracting with other entities for the confinement of inmates**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion**

**must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO is a private provider and does not contract with other agencies for the confinement of inmates. GEO Policy 5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA for Adult Prison and Jail and Adult Community Confinement Facilities) states GEO shall adhere to all contracts with other entities for the confinement of individuals that require its obligation to adapt and comply with the PREA standards. It also states contractors in its facilities that have direct contact with individuals in GEO facilities or programs shall be obligated to comply with PREA standards. These requirements are required to be in the contracts. FBOP program reviews do inspect various PREA standards. The auditor reviewed some of the program reviews.

### **Standard 115.13 Supervision and monitoring**

- 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)

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GEO ensures each institution it operates develops documents, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse by monitoring and reviewing the staffing plans. GEO Policy 5.1.2-A and Big Springs Correctional Center Policy 12.005 establishes procedures to develop and monitor staffing plans uses the criteria found in standard 115.13 (a) to include generally accepted correctional practices; any judicial findings of inadequacy; any findings of inadequacy from Federal investigative agencies; any findings of inadequacy from internal or external oversight bodies; all components of the institution’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated); composition of the inmate population; number and placement of supervisory staff; institution programs occurring on a particular shift; any applicable State or local laws, regulations, or standards; prevalence of substantiated and unsubstantiated incidents of sexual abuse; and other relevant factors to develop and review the staffing plan.

The auditor reviewed the Big Springs Correctional Center staffing plan; and 2015 and 2016 annual review. The staffing plan is reviewed annually by the facility, GEO Corrections Division, and PREA Coordinator. The signature of the PREA Coordinator on the Annual Review confirmed that this was done in consultation with her. GEO has established a good form to conduct the annual assessment to ensure all eleven criteria are properly reviewed and addressed. The plan follows generally accepted correctional practices. There have been no findings of inadequacy from any external or internal oversight bodies. All components of the facility's physical plant are considered and blind-spots are acknowledged and steps are taken to fix the blind spots. There is a brief description of the inmate population and the times programs are occurring. The prevalence of substantiated and unsubstantiated incidents of sexual abuse is also mentioned. The Warden provided documentation that Big Springs Correctional Center assesses, determines, and documents whether adjustments are needed to the staffing plan, the facility's deployment of video monitoring and other monitoring technologies, and the resources the facility has available to commit to ensure adherence to the staffing plan. CCTV monitors have been added since the last PREA audit. The auditors provided some recommendations for additional cameras and new monitors to replace some of the older monitors.

By policy the facility documents all deviations to the plan and it is reported to GEO. Per the Pre-audit questionnaire and interview of the Warden and PREA Compliance Manager; and review of manning sheets; there were no deviations from the plan. The facility authorizes overtime to fill all positions. The Warden reviews posting logs to ensure all positions are properly manned.

Throughout the site review, the auditors saw evidence that intermediate and higher level supervisors (Assistant Wardens and others) conduct and document unannounced rounds on all shifts to deter and identify staff sexual abuse and sexual harassment. Staff and inmate interviews further confirmed the unannounced rounds by supervisors. PREA unannounced rounds are documented in housing unit logs and a memorandum by the supervisor of his checks during the week. Housing unit logs and one memorandum were provided prior to the audit. During the audit, the auditors checked additional logs and duty officer reports. Staff is also prohibited from alerting other staff that unannounced rounds are being conducted. Supervisors prevent alerting by going to housing and program areas at different times throughout

the shifts.

### Standard 115.14 Youthful inmates

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

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Big Springs Correctional Center is an adult male facility and does not house youthful offenders.

### Standard 115.15 Limits to cross-gender viewing and searches

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Based on review of GEO policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005, review of training material, interview of staff and inmates, and observation it was determined the facility limits cross-gender viewing and searches. Big Springs Correctional Center does not conduct cross-gender strip searches or cross-gender visual body cavity searches, and staff is prohibited and does not search transgender or intersex inmates to determine inmates' genital status. The facility provided memorandum stating no cross-gender strip searches or cross-gender visual body cavity searches, the auditors checked inmate search log and there were no recorded cross-gender strip searches or cross-gender visual body cavity searches.

Standards 115.15 b and part of c does not apply as Big Springs Correctional Center is a male only facility.

Based on review of GEO policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005, review of training material, interview of staff and inmates, and observation it was determined inmates are able to shower, perform bodily functions, and change clothes without non-medical staff observing their genitalia or buttocks, except in exigent circumstances or when such viewing is incidental to routine cell checks. Most inmates interviewed stated they could shower and change clothes without being observed by female staff. There were two areas that inmates could not use urinals without their genitalia or buttocks being observed from certain angles, except in exigent circumstances or when such viewing is incidental to routine cell checks.

Finding: Based on observation and interviews inmates are not able to perform bodily functions in one housing area at Flightline facility and outside recreation at airpark facility (115.15(d)).

The Corrective Action Plan was for the wall the urinal area in one housing area be extended and a curtain be added to the urinal in the outside recreation area so inmates are able to perform bodily functions without opposite gender non-medical staff observing their genitalia or

buttocks. The facility was given 90 days to complete the corrective action. Photos was provided to the auditor in early and late July, under the 90-day period.

Based on review of GEO policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005, review of training material, interview of staff and inmates, review of logs, and observation it was determined female staff announce their presence when entering an inmate housing unit.

Review of training records and lesson plans demonstrated staff had been trained on how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Prior to the audit, training documents were provided to the auditor demonstrating staff had been trained on searches of transgender and intersex inmates. Interviews of staff demonstrated staff was trained and very knowledgeable of the proper procedures to conduct pat down searches of transgender and intersex inmates. This was the best trained staff for conducting searches of transgender and intersex inmates that the auditor has observed to date at the time of the audit, and only one of few audits the auditor has conducted that has not required corrective action for searches of transgender and intersex inmates.

### **Standard 115.16 Inmates with disabilities and inmates who are limited English proficient**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 ensure inmates with disabilities and who are limited English proficient have access to PREA information and programs. GEO and Big Springs Correctional Center has taken appropriate steps to ensure that inmates who are limited English proficient or disabled 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. GEO has a contract with Language Line Services Inc., to provide foreign language translation, American and Spanish Sign Language and assistance. PREA handouts and inmate handbooks are in English and Spanish. English and Spanish PREA posters are posted throughout the institution for inmates, staff, and visitors to see. Staff and inmates interviewed stated inmates are not used as interpreters when addressing sexual abuse and sexual harassment allegations. The Pre-Audit Questionnaire (PAQ) stated no inmate interpreters had been used. A number of staff spoke Spanish. Inmates seemed very at ease using staff interpreters during the audit, the auditors also used the language line for one interview.

Informational and educational materials for inmates with physical and mental disabilities are provided in ways that will enable the inmate to understand the GEO and FBOP zero tolerance policy and related material and be able to make a claim of sexual abuse or sexual harassment, if necessary. For inmates who are hearing impaired, the facility has a Teletype (TTY) machine available for inmates who are hearing impaired. Basic PREA information is also in Braille in English and Spanish. Inmates with limited vision are assisted by some of the posters having been printed in larger print. For inmates with a mental disability, staff spend time to ensure they understand the PREA basics of definitions and reporting.

### **Standard 115.17 Hiring and promotion decisions**

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



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GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 outlines policy and procedures to ensure staff and contractors are not hired or promoted who have engaged in sexual abuse in a prison, jail, lockup, community confinement institution, juvenile institution, or other institution; 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 been civilly or administratively adjudicated to have engaged in sexual activity facilitated by force, overt or implied threats of force, or coercion. GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires the institution to 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 inmates. Prior to the audit two employee application packets and one contractor packet were reviewed; and during the audit and report writing period 39 employee and contractor application packets were reviewed. Through review of staff and contractor records and staff interviews it was determined staff and contractors are not hired or promoted who have engaged in sexual abuse in a prison, jail, lockup, community confinement institution, juvenile institution, or other institution; 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 been civilly or administratively adjudicated to have engaged in sexual activity facilitated by force, overt or implied threats of force, or coercion. The documents and interviews also demonstrated GEO and the facility considers incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires background checks for staff and contractors prior to hiring or enlisting services for a contractor and every again five years; and for staff 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. Prior to the audit reviewed one background check of an employee. Interviews of Human Resource staff and employees, and review of Big Springs Correctional Center background spread sheet and 39 additional staff and contractor background checks, demonstrated background checks were done prior to employment, and none had a background check more than five years old. Interviews of Human Resource staff and employees, and review of application packets demonstrated contact with prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. Background checks include checks through AURICO Reports LLC, GEO used to use ACCURATE Inc.

GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 states Big Springs Correctional Center shall ask all applicants and employees who may have contact with inmates directly about previous sexual misconduct as described in PREA standard 115.17 (a) in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees; and imposes upon employees a continuing affirmative duty to disclose any such misconduct. GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires information be provided 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. Prior to the audit received two staff applications, and one annual review demonstrating they addressed previous sexual misconduct as described in PREA standard 115.17 (a) in written applications or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. Both of these policies were confirmed through interviews and review of additional personnel documents to include examples of employee annual affirmation during the audit. During the audit reviewed 39 additional employees' files that demonstrated employees who may have contact with inmates directly are asked about previous sexual misconduct as described in PREA standard 115.17 (a) in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees; and imposes upon employees a continuing affirmative duty to disclose any such misconduct.

GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 states material omissions regarding sexual misconduct, or the provision of materially false information, shall be grounds for termination.

GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 states GEO 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 such employee has applied to work. Interviews of personnel staff and one request for information demonstrated they provide the information.

## **Standard 115.18 Upgrades to facilities and technologies**

- 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)

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Through review of GEO policies 5.1.2-A and Big Springs Correctional Center Policy INM 12.005, and interviews of the Agency Head representative, PREA Coordinator, PREA Compliance Manager, and Warden it was determined that the GEO considers the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect inmates from sexual abuse.

During the review of the staffing plan, the video monitoring system is also reviewed to ensure coverage enhances the ability to protect inmates from sexual abuse. Interview of the Warden and PREA Compliance Manager, and review of the staffing and camera plan; demonstrated Big Springs Correctional Center continues to budget for upgrades of and additional cameras based on PREA concerns.

#### **Standard 115.21 Evidence protocol and forensic medical examinations**

- 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)

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GEO Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior (PREA), Big Springs Correctional Center Policy INM 12.005, and Big Springs Correctional Center Correctional Health Care Policy C-13 outline evidence protocols for administrative proceedings and criminal prosecutions; requirements for forensic medical exams; and when requested by the victim, a victim advocate to accompany and support the victim through the forensic examination, investigatory interviews, emotional support, crisis intervention, information, and referrals.

There is a uniform evidence protocol that maximizes the potential for usable physical evidence for administrative and criminal prosecutions. Majority of the staff interviewed were very knowledgeable of the evidence protocols, and could explain the protocol for obtaining useable evidence when an inmate alleged sexual abuse. One of the auditors conducted interviews with the facility investigators, who had a good understanding of the investigative procedures and responsibilities and evidence protocols.

The Odessa Regional Medical Center provides SAFE and SANE services when necessary. The institution previously used the Scenic Mountain Medical Center. Interviews with medical staff demonstrated the steps they perform to initially treat the victim for life saving issues without losing useable evidence, sending the inmate to Odessa Regional Medical Center for a forensic exam if applicable, and providing education and follow-up treatment to the inmate. One example of a forensic exam conducted at Scenic Mountain Medical Center was reviewed by the auditor.

Big Springs Correctional Center makes available to the victim a victim advocate from a rape crisis center. There is a Memorandum Of Understanding between Big Springs Correctional Center and Crisis Center (formerly Angel House) located in Odessa, TX to provide advocacy services if requested by the victim. The victim advocate will accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information and referrals. The

auditors called the Crisis Center during the on-site audit.

### **Standard 115.22 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-E and Big Springs Correctional Center Policy INM 12.005, requires an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment, that all allegations of sexual abuse or sexual harassment are referred for investigation by the appropriate authority. Referrals of allegations are first investigated by Big Springs Correctional Center. If the allegation involves potentially criminal conduct, it is referred to the GEO Office of Professional Responsibility for review and to the Office of Internal Affairs (OIA) and then to the Office of Inspector General if warranted. Based on review of the investigative paperwork, and interview of staff and inmates; an administrative or criminal investigation is conducted for all allegations of sexual abuse and sexual harassment. GEO’s Investigative policy is available on the GEO Web site.

The auditors reviewed 11 investigations of sexual abuse and sexual harassment at Big Springs Correctional Center during the audit cycle. There were four inmate-inmate allegations: one inmate-on-inmate sexual harassment unsubstantiated; one inmate-on-inmate sexual harassment unfounded; and two inmate-on-inmate sexual abuse unsubstantiated.

There were seven staff-on-inmate allegations: one staff-on-inmate sexual harassment unsubstantiated; three staff-on-inmate sexual abuses unsubstantiated; and three staff-on-inmate sexual abuse unfounded.

One case was an assist for another facility that the inmate reported the incident while at Big Springs Correctional Center, but occurred at another facility.

### **Standard 115.31 Employee 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 addresses PREA staff training requirements. Review of the lesson plans and slides demonstrated the training covered: zero-tolerance policy for sexual abuse and sexual harassment; how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; inmates’ right to be free from sexual abuse and sexual harassment; the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment in confinement; the common reactions of

sexual abuse and sexual harassment victims; how to detect and respond to signs of threatened and actual sexual abuse; how to avoid inappropriate relationships with inmates; how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; and transgender and intersex searches.

Big Springs Correctional Center staff receive PREA training annually through scheduled training and roll call. The PREA training curriculum was reviewed and verified that the training provided to employees is very comprehensive. The PREA Coordinator modifies GEO wide PREA training curriculum annually emphasizing areas identified as areas needing emphasis. 2017 PREA training emphasizes inmate searches. Employees sign an acknowledgement form that they have received and understood the PREA training they received during pre-service training. Staff interviewed were well versed in the GEO zero tolerance policy; their responsibilities in reporting sexual abuse, sexual harassment, and staff negligence; first responder duties; evidence preservation, and transgender and intersex searches. Big Springs Correctional Center staff is the best trained staff this auditor has audited when it comes to transgender and intersex searches. On-site and during the interim report writing period, the auditor reviewed 39 staff training records which documented all 39 staff acknowledging they understood the PREA training for their respective last two years as applicable.

### **Standard 115.32 Volunteer and contractor 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

The auditor reviewed GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005; contractor and volunteer PREA training material; and contractor and volunteer training records and memorandum stating they understood the training. A good curriculum was reviewed that was very comprehensive with the objectives of the training ensuring that volunteers and contractors are notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and are informed on how to report such incidents. Interviews of the contractor and volunteer demonstrated their knowledge of PREA, their responsibilities, and the agency zero tolerance policy. All contractors and volunteers who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. The auditor reviewed six contractors and two volunteers' records, verifying they acknowledge by signature that they received and understood the training.

### **Standard 115.33 Inmate education**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires that all inmates receive PREA information upon arrival and PREA education within 30 days of intake. During intake inmates are provided information through an inmate rule book (both available in English and Spanish) that explains both agencies zero tolerance policy regarding sexual abuse and sexual harassment; and how

to report such incidents while at Big Springs Correctional Center. The staff covers basic PREA information verbally. During institution orientation, they receive additional training which expands on the previous information provided. Most inmates receive the comprehensive education within seven days. Inmates acknowledge receiving the PREA information in writing. Inmate handbooks are provided to inmates in formats accessible to all inmates to ensure that key information is continuously and readily available or visible to inmates. GEO and FBOP posters are posted throughout the facility in formats accessible to all inmates to ensure that key information is continuously and readily available or visible to inmates. Information on the posters and in the handouts, include: zero tolerance policy; inmate rights; how to report; what to expect after you report; and how to protect yourself against sexual assault. GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires information be provided in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills.

During the tour and interviews most inmates acknowledged the information being provided upon arrival and orientation, and posters displayed throughout the institution. The inmates interviewed knew the zero-tolerance policy; how and who to report to; and that they have the right to be free from retaliation for reporting such incidents. Prior to the audit, the auditor reviewed three examples of an inmate documenting training; and randomly reviewed 86 additional inmate records onsite and during the report writing period which demonstrated inmates received PREA information upon arrival, training within 30 days of arrival, and acknowledged through signature they have received the handbook, handouts, and understood the training. There was documentation all 86 had received training on arrival and comprehensive training during orientation. Some inmates were at the facility prior to PREA and they had documentation that they had received training in 2014.

#### **Standard 115.34 Specialized training: Investigations**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires the facility investigator receives specialized training in addition to the general education provided to all employees. GEO PREA Coordinator attended the Moss Group “Train the Trainers Specialized Training; Investigating Sexual Abuse in Corrections Setting” sponsored by the PREA Resource Center. She then tailored the program for GEO investigators and is the instructor for all GEO investigator training. The auditor reviewed the specialized training for investigators, and it covered all requirements of the standard to include: techniques for interviewing sexual abuse victims; proper use of Miranda and Garrity warnings; sexual abuse evidence collection in confinement settings; and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Three Big Springs Correctional Center investigators were trained in 2013, four were trained in 2015. Big Springs Correctional Center maintains documentation that the investigator has received both the general and investigative PREA training. All current investigators are trained. The lesson plans, slides and sign in sheets were reviewed and interview of the investigator demonstrated good understanding of how to conduct a sexual abuse investigation in a confinement setting.

#### **Standard 115.35 Specialized training: Medical and mental health care**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance**

**determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 outlines the training required for medical and mental health practitioners to include how to detect and assess signs of sexual abuse and harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and harassment. Training is conducted by using GEO medical and mental health training curriculum and includes a test. Big Springs Correctional Center ensures all medical and mental health staff complete their annual training and specialized PREA medical and mental health training, and maintains documentation for each. The auditors reviewed five medical staff members training records demonstrating specialized medical, and annual basic PREA training in 2015 and 2016. Interviews of medical and mental health staff demonstrated they understood: how to detect and assess signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. During the interviews, each discussed the steps from when the inmate is brought to medical, sent out for a forensic exam, returned to medical and follow-up treatment and coordination. The Mental health staff discussed the procedures when inmates are referred to mental health based on a PREA screen and PREA incident. Medical staff does not conduct forensic medical examinations.

#### **Standard 115.41 Screening for risk of victimization and abusiveness**

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires facilities to: conduct a screening for risks of sexual victimization and abusiveness within 24 hours of arrival; a follow-up screening for risks of sexual victimization and abusiveness within a set time period, not to exceed 30 days from the inmate’s arrival at the facility; and reassesses inmate’s risk level again when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate’s risk of sexual victimization or abusiveness. Big Springs Correctional Center uses both the FBOP and GEO PREA screening tool. The FBOP PREA screening tool is part of the required classification system, but the GEO PREA screening tool is what is used to conduct PREA screens. The auditor reviewed three examples of inmate screening forms (initial screen and follow-up screen) prior to the audit. The auditor randomly selected 87 inmates and reviewed their screens during the on-site and report writing period. Of the 90 initial screening forms reviewed: 82 were screened the day the inmate arrived; eight were confined prior to the implementation of PREA and initial screens were conducted between December 2013 and February 2014. Of the 90 follow-on screening forms: 81 were screened within 30 days (majority between 14 – 28 days); one was done on the 36<sup>th</sup> day following arrival; and the eight pre-PREA was done within 30 days of their initial screen. Big Springs Correctional Center reassess the inmate’s risk of victimization or abusiveness by using the GEO PREA reassessment screening tool which is based on any new information that may have arrived since the inmate’s arrival, and they ask the inmate if he has been sexually threatened or assaulted, if they are LGBTI, and do they feel at risk of sexual abuse. An inmate’s risk level is also reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate’s risk of sexual victimization or abusiveness. The screening instrument is objective in determining if the inmate is at risk for victimization or abusiveness. During inmate interviews, most inmates who arrived within the last 12 months remembered receiving the PREA screen.

The auditor had four staff who conduct the screens perform the screen of the auditor to demonstrate the process of filling out the screening form. The process was done very professionally. Some information is provided through asking the inmate questions, others through review of inmate records. All the criteria referenced in the standard are on the current form; and inmates are asked all of the questions required to be asked of the inmate except whether the inmate has a mental, physical or developmental disability, and whether they are intersex. The screener does make his/her own assessment of whether the inmate is gender non-conforming; the screeners interviewed did know the definition of gender nonconforming.

Finding reference standard 115.41 (d) The intake screening shall consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization to include: (5) whether the inmate's criminal history is exclusively nonviolent. The review of earlier screens determined screening for whether the inmate's criminal history is exclusively nonviolent was in the screen for assessing inmates risk of being sexual abusive and not for screening for risk of sexual victimization. GEO updated the form on April 11th and conducted training with screeners. Big Springs Correctional Center had examples since April 18th when they implemented the new form. The Corrective Action Plan was to provide examples (one per week) for 60 days beginning April 18th. Big Springs Correctional Center provided the required documentation and was found to be compliant with the standard.

Staff interviews confirmed appropriate controls have been implemented to ensure that sensitive information is not released and exploited by staff or other inmates. The screening instrument was restricted to staff making housing, work and program assignments. Inmates are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked.

### **Standard 115.42 Use of screening information**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 and outlines the use of the screening form to include: using the information from the risk screening to determine housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive; and making individualized determinations about how to ensure the safety of each inmate.

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 and 11.002 Transgender Processing and Care states the agency shall consider on a case-by-case basis whether to assign a transgender or intersex inmate to an institution for male or female inmates, housing and programming assignments, based on the inmate's health and safety, inmate's own views with respect to his or her own safety, and whether the placement would present management or security problems; reviewing twice a year placement and programming assignments for each transgender or intersex inmate to review any threats to safety experienced by the inmate; allowing transgender and intersex inmates the opportunity to shower separately from other inmates; and not placing lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated institution, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

Through a review of screening forms, four housing and program decisions, inmate and staff interviews, it was clear Big Springs Correctional Center uses the screening information to determine housing, bed, work, education, and program assignment with the goal of keeping inmates at high risk of being sexually victimized separate from those at high risk of being sexually abusive. The decisions are made on a case-by-case basis using information from the screen, assigned PREA classification, and good correctional judgment. The process is clearly defined in the policies and implemented in the use of PREA and classification forms. The PREA Compliance Manager maintains a roster of those who could be at risk of being sexually victimized, and those who are at risk of being sexually abusive. The list is one tool to ensure those who could be sexually victimized are separated from those who could be sexually abusive in housing, bed and other classification decisions.

Inmates interviewed who identified as bisexual or gay acknowledged they were treated with respect and were not housed in dedicated housing area. The facility has not received transgender or intersex inmates. If they were to receive them, they are to inform the FBOP monitor at the facility, and placement and programming assignments for each transgender or intersex inmate would be reassessed at least twice each year to review any threats to their safety. Transgender and intersex inmates would be given the opportunity to shower separately from other inmates.

### Standard 115.43 Protective custody

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 and SEC 08.021 Protective Custody operations states inmates at high risks for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers; if placed in segregated housing involuntarily they shall have access to programs, privileges, education, and work opportunities to the extent possible; that the facility shall document any access to programs, privileges, education, or work opportunities that was restricted, duration of restriction and why; and that every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. Interviews of the Warden, PREA Compliance Manager, and segregation staff verified inmates at high risk of sexual victimization would not be placed in involuntary segregation unless other measures have been assessed. Other measures included moving housing areas or facilities. It was confirmed through Pre-Audit Questionnaire; investigative paperwork; and during interviews with the Warden, staff who supervise segregated inmates, and inmates; that no inmates at high risk for sexual victimization had been placed in involuntary segregated housing during the past 12 months prior to the audit. GEO documents any review of alternatives using a form that addresses possible alternatives reviewed prior to placing inmates at high risks for sexual victimization shall not be placed in involuntary segregated housing.

### Standard 115.51 Inmate 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Big Springs Correctional Center inmate handbook, PREA handouts, and posters throughout the facility provide specific internal and external ways for inmates to report sexual abuse, sexual harassment and retaliation by other inmates or staff for reporting sexual abuse and sexual harassment. Interviews of inmates and staff and review of investigations verified inmates knew of and used multiple internal and external ways to report incidents of abuse or harassment, and retaliation. Inmates can report verbally and in writing to staff; through a third party, grievance, Office of the Inspector General, and applicable consulate (numbers are provided). The facility has a Memorandum of Understanding with Crisis Center (formerly Angel House) to provide private reporting of sexual abuse and harassment by telephone. During the tour, the crisis hotline was checked in three housing units and found to be in working order.

GEO Employees reporting Sexual Abuse or Sexual Harassment may report such information to the Chief of Security or facility management privately if requested. They may also report Sexual Abuse or Sexual Harassment directly to the GEO Employee Hotline, which is an independent, professional service, available 24 hours per day, 7 days a week on the Internet at [www.reportlineweb.com/geogroup](http://www.reportlineweb.com/geogroup) or at the toll-free phone number (866) 568-5425. Employees may also contact the Corporate PREA Director directly at (561) 999-5827. They can



also contact the Office of Internal Affairs.

Examples of inmate reporting through different means were reviewed when investigative cases were reviewed. Staff accepts reports made verbally, in writing, anonymously, and from third parties, and are promptly documenting any verbal reports.

#### **Standard 115.52 Exhaustion of administrative remedies**

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Review of GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005, Inmate Handbook, and grievances. Big Springs Correctional Center does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse; does not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse; ensures that an inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint; and issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of inmates. The auditor reviewed a PREA grievance from the audit cycle and was found to be in compliance with the standard. There were no PREA emergency grievances files in the last 12 months.

The agency may discipline an inmate for filing a grievance related to alleged sexual abuse only where the facility demonstrates that the inmate filed the grievance in bad faith. Inmates are informed of grievance procedures in the inmate handbook.

#### **Standard 115.53 Inmate access to outside confidential support 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Review of GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 states inmates shall be provided access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations; and the facilities shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.

Big Springs Correctional Center has a Memorandum of Understanding with Crisis Center (formerly Angel House) of Odessa, TX, who provides for victim advocacy for emotional support services related to sexual abuse. The Memorandum of Understanding describes the services to be provided which includes confidential support services 24 hours a day, seven days a week. Phone numbers are provided to the

inmate on the PREA posters. Inmate interviews identified some inmates did not know of the confidential support services provided and the information was not near all phones in the different facilities/housing areas. The auditor tested the number during the on-site audit.

Not Meet Finding. The auditors found the facility not meet with standard 115.53 because of the limited posters and posted numbers near phones, and some of the information was recently posted. Corrective Action Plan was to post the information in the housing unit and next to the phone, and take pictures of posters and the stickers on the phones. Some of the information was completed prior to the on-site audit being completed, others were photographed and sent to the auditors. Auditors determined Big Springs Correctional Center meets the standard.

### **Standard 115.54 Third-party 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 establishes a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate. GEO and FBOP websites outlines GEO and FBOP methods to report sexual abuse and sexual harassment on behalf of an inmate. GEO website provides a number and mailing address. The FBOP Website states to call facility PREA Compliance Manager or write to PREA Coordinator for inmate abuse and to FBOP Office of Internal Affairs for staff abuse, providing addresses for both. Posters at the facility provide the visitors, staff, and inmates the same information. Discussion with inmates demonstrated they knew how third-party reporting could be accomplished.

### **Standard 115.61 Staff and agency reporting duties**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 require all staff to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment; and for staff not to reveal any information related to a sexual abuse report to anyone other than extent necessary. Big Springs Correctional Center does not confine juveniles, nor has there been any incidents involving vulnerable adults. If a vulnerable adult reports Big Springs Correctional Center is required to report to Texas Department of Family Protective Services. Health practitioners are required to report sexual abuse and to inform inmates of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services. Health practitioners during interviews stated they are required and would report sexual abuse. Review of investigative files; and interviews of staff and inmates verified staff immediately report to the facility’s designated investigator any knowledge, suspicion, or information regarding an incident of sexual abuse

or harassment; and that staff does not reveal information related to a sexual abuse report other than to people authorize to discuss the report. Interviews with inmates and staff did not reveal any incident of sexual abuse or harassment not reported to the facility's designated investigator, and know not to reveal any information about a sexual abuse incident to anyone other than to the extent necessary.

### **Standard 115.62 Agency protection duties**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires staff to take immediate action to protect any inmate they learn is subject to substantial risk-. Interviews with staff demonstrate they know the steps to take to protect an inmate subject to risk of imminent sexual abuse. Security staff immediately employs protection measures as the information is passed to the Investigator, PREA Compliance Manager and Senior Warden. Per the interview with the PREA Compliance Manager and Senior Warden, no inmate has reported substantial risk of imminent sexual abuse. Based on Big Springs Correctional Center Policy INM 12.005 immediate action includes: separation; monitoring; change housing and/or work assignments; placing other inmate in another facility within the correctional center, special housing unit or request FBOP transfer.

### **Standard 115.63 Reporting to other confinement facilities**

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires when an allegation that an inmate was sexually abused while confined at another institution, the Warden that received the allegation shall notify the Warden where the alleged abuse occurred within 72 hours after receiving the allegation; that all sexual abuse allegations reported by another institution regarding any inmate that was confined at the Big Springs Correctional Center be fully investigated. Interviews with the Senior Warden, PREA Compliance Manager, and investigator confirmed their knowledge of the policies and responsibilities to report any allegations and investigate any allegations that may have occurred at Big Springs Correctional Center. The Senior Warden would email to document providing the information. The auditor reviewed the two allegations that an inmate was sexually abused while confined at another institution in 2015 and 2016. Information was forwarded to the Warden at the other facility. During the audit cycle, Big Springs Correctional Center did not receive information from another facility of an inmate alleging sexual abuse while at Big Springs Correctional Center. During Senior Warden interview he knew the procedures should his staff be told of an allegation at another facility and when another facility contacts him of an incident that has alleged to occur at his facility.

### **Standard 115.64 Staff first responder duties**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 outlines procedures to respond to an allegation of sexual abuse for both security and non-security staff. There is a GEO Incident Checklists to be used when responding to sexual abuse or sexual harassment. Random interviews with security and non-security staff confirmed both security and non-security staff were very knowledgeable what to do upon learning an inmate was sexually abused to include separating the alleged victim and abuser; how to preserve the crime scene; and what actions inmates should not take in order not to destroy physical evidence. Staff knew if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim and alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Good training has prepared the staff to properly respond. There have been no allegations that required collection of physical evidence 12 months prior to the audit. No forensic exams were conducted by SANE/SAFE staff in the 12 months prior to the audit, though the auditor reviewed a case from October 2015 that included a forensic exam, and the case was substantiated.

**Standard 115.65 Coordinated response**

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO policy 5.1.2-A requires Big Springs Correctional Center to develop 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. Big Springs Correctional Center PREA Coordinated Response Plan was very comprehensive in describing required actions by security and special staff. Interviews with staff (first responders, medical and mental health practitioners, investigators, and institution leadership), and review of the PREA Incident Checklists for Incidents of Sexual Abuse and Harassment, investigative and medical files confirmed staff were knowledgeable about the PREA plan and the coordinated duties and collaborative responsibilities.

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

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Based on GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005, GEO and Big Springs Correctional Center shall not enter into or renew any collective bargaining agreement or other agreement that limits the facility's ability to remove alleged employee sexual abusers from contact with any individual in a GEO facility or program pending the outcome of an investigation. Collective Bargaining Agreement between GEO and the International Union, Security Police and Fire Professionals of America (SPFPA) and local 126 regarding discipline of officers does not limit the agency's ability to use administrative leave or termination to remove a sexual abuser from inmate contact. The auditor reviewed an example of a staff member being placed on administrative leave during the investigation. GEO policy allows the facility to move the staff member to a non-contact posts, and the auditor reviewed an example from 2016.

### **Standard 115.67 Agency protection against retaliation**

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 require a staff member be designated to monitor for retaliation against staff or inmates who reported or had been sexually abused or harassed; provided multiple protection measures for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations; monitoring the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff; and conducting periodic status checks through interviews at least every seven days. Monitoring will occur for at least 90 days following the report of the allegation and may go beyond the 90 days if the monitoring indicates a continuing need. The PREA Compliance Managers are responsible for monitoring for retaliation. When interviewed they were able to explain their role in preventing retaliation and what measures they take to protect inmates and staff from retaliation. The PREA Managers provide weekly monitoring for up to 90 days and this monitoring extends past 90 days if the inmate or PREA Manager feel additional monitoring is warranted. Prior to the audit, Big Springs Correctional Center provided two examples of monitoring of the inmates. During the audit, one auditor reviewed the monitoring logs from the eleven investigations reviewed. Interviews of the Warden and PREA Compliance Manager, and review of the monitoring logs demonstrated Big Springs Correctional Center uses multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. For at least 90 days following a report of sexual abuse, Big Springs Correctional Center monitors the conduct and treatment of inmates who reported the sexual abuse; and of inmates who were reported to have suffered sexual abuse. Per the PAQ and interviews there were zero incidents of retaliation.

### **Standard 115.68 Post-allegation protective custody**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 states involuntary segregated housing for inmates who have alleged to have suffered sexual abuse may be used only after an assessment of all available housing alternatives has shown there are no other means of protecting the inmate; and use of protective custody to protect alleged victim is only used as a last resort for a very short time. If placed in segregated housing involuntarily they shall have access to programs, privileges, education, and work opportunities to the extent possible; and that the institution shall document any access to programs, privileges, education, or work opportunities that was restricted and that every 30 days, the institution shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. There were no inmates who have alleged to have suffered sexual abuse in protective custody during the audit. Based on interviews of the Warden, PREA Compliance Manager, and segregation staff, and review of secondary documentation, there were no instances of using segregation housing to protect inmates who had alleged to have been sexually abused in the last 12 months. They also stated alternate protective measures would be used in lieu of protective custody and if they had to place an inmate in segregated housing involuntarily they would have access to programs, privileges, education, and work opportunities to the maximum extent possible. Use of protective custody to protect alleged victim is only used as a last resort for a very short time.

### **Standard 115.71 Criminal and administrative agency 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Based on review of GEO Policy 5.1.2-E, Big Springs Correctional Center Policy INM 12.005, and FBOP Program Statement 5324.12 Sexual Abusive Behavior Prevention and Intervention Program; investigation case tracking log; the eleven PREA investigations reviewed; interviews of the Senior Warden, Wardens, PREA Compliance Manager, and investigators it was determined an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Big Springs Correctional Center conducts its investigations using uniform evidence protocols. Big Springs Correctional Center investigators starts all investigations and conducts administrative investigations. When criminal conduct is suspected, the case is referred to Office of Internal Affairs who has the legal authority to conduct criminal investigations. GEO's Investigative policy is available on the company's Web site.

The auditors reviewed 11 investigations of sexual abuse and sexual harassment at Big Springs Correctional Center during the audit cycle. There were four inmate-inmate allegations: one inmate-on-inmate sexual harassment unsubstantiated; one inmate-on-inmate sexual harassment unfounded; and two inmate-on-inmate sexual abuse unsubstantiated. There were seven staff-on-inmate allegations: one staff-on-inmate sexual harassment unsubstantiated; three staff-on-inmate sexual abuses unsubstantiated; and three staff-on-inmate sexual abuse unfounded. One case was an assist for another facility that the inmate reported the incident while at Big Springs Correctional Center, but occurred at another facility.

The investigators interviewed stated that they collect the appropriate direct and circumstantial evidence, reviews the video tapes, interviews the alleged victim, suspected perpetrators, and witnesses. They also review prior complaints and reports of sexual abuse involving the suspected perpetrator. All investigations 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. The Investigators also stated that the credibility of the victim, suspect, or witness is always assessed on an individual basis. Polygraphs are not used in PREA investigations. Seven investigators have documentation of annual PREA training and the GEO specialized training for PREA investigators. This is a very extensive training program.

When conducting administrative investigations, the investigators always makes a determination whether staff actions or failures to act

contributed to the abuse. The auditors read eleven investigation reports and found them to include a description of the incident, the evidence collected, and summaries of interviews.

The departure of the alleged abuser or victim from the employment or control of Big Springs Correctional Center or agency shall not provide a basis for terminating an investigation. Per policy GEO retains all written investigation reports for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

### **Standard 115.72 Evidentiary standard for administrative 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

A review of GEO Policy 5.1.2-E and investigations; and interviews with the investigators and administrative staff confirm the Big Springs Correctional Center has no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. When the investigator was asked what standard of evidence was used in determining if an allegation is substantiated, the agencies policy was recited confirming compliance with the standard.

### **Standard 115.73 Reporting to inmates**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-E and Big Springs Correctional Center Policy INM 12.005 requires facilities to inform the inmate as to whether the allegation of sexual abuse has been determined to be substantiated, unsubstantiated, or unfounded; if investigated by an outside agency, request the outside investigative agency inform the inmate as to whether the allegation of sexual abuse has been determined to be substantiated, unsubstantiated, or unfounded; if the allegation is against a staff member, the facility shall inform the inmate whenever the staff member is no longer posted within the inmate's unit, no longer employed at the institution, has been indicted on a charge related to sexual abuse within the institution, or has been convicted on a charge related to sexual abuse within the institution; if the inmate allegation is against an inmate be whenever the alleged abuser has been indicted on a charge related to sexual abuse within the institution, or has been convicted on a charge related to sexual abuse within the institution; and that all notifications will be documented.

Prior to the audit, Big Springs Correctional Center provided copies of three notifications to the inmates (2015 and 2016). On-site the auditor reviewed the notifications for the eleven investigations reviewed. All notifications are done using the GEO notification form. Based on interviews with the Senior Warden and Compliance Manager, and review of the notifications; notifications to inmates are done and documented. The agency's responsibility to report shall terminate if the inmate is released from the agency's custody.

### Standard 115.76 Disciplinary sanctions for staff

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Per GEO Policy 5.1.2-E and Big Springs Correctional Center Policy INM 12.005, GEO employee handbook, Big Springs Correctional Center Standards of Employee Conduct and interviews with staff: staff are subject to disciplinary sanctions for violating agency sexual abuse or sexual harassment policies; termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse; and disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be 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. Prior to the audit the auditor reviewed a case of staff sexual abuse in 2016, staff member was terminated. Two examples were provided where PREA was unsubstantiated but staff misconduct was substantiated and they were disciplined.

### Standard 115.77 Corrective action for contractors and volunteers

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-E and Big Springs Correctional Center Policy INM 12.005 prohibit contractors or volunteers who engaged in sexual abuse to have contact with inmates and requires they be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. The Senior Warden reported that there have been no allegations of sexual abuse by contractors or volunteers. Interviews with contractors and volunteers confirmed they knew the punishment for engaging in sexual abuse or sexual harassment of inmates or staff.

### Standard 115.78 Disciplinary sanctions for inmates

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion**



**must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Per review GEO Policy 5.1.2-E and Big Springs Correctional Center Policy INM 12.005, and interviews with Big Springs Correctional Center staff, inmates are subject to disciplinary sanctions following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse; sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories; and considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior. In the 12 months prior to the audit there have been one substantiated finding and disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse. Big Springs Correctional Center prohibits all sexual activity between inmates and discipline inmates for such activity.

#### **Standard 115.81 Medical and mental health screenings; history of sexual abuse**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires all new inmates receive a PREA screen upon arrival, along with a medical and mental health screen. If any of these identify someone as having experienced prior sexual victimization or previously perpetrated sexual abuse, whether in a prison/jail setting or in the community, they will be offered a medical and mental health follow-up meeting within 14 days. Prior to the audit, the audit reviewed three referrals (inmates who reported prior sexual victimization) within 14 days (five and ten days) of the PREA screen. During the audit, reviewed additional PREA screens and medical and mental health records, it was determined inmates who reported prior sexual victimization or previously perpetrated sexual abuse were offered consults with medical and mental health practitioners within 14 days of the screen. Interviews of case managers who conduct screens, medical and mental health staff confirmed referrals are offered, scheduled and conducted. Interview of two inmates who previously experienced prior sexual victimization reported they were offered medical and mental health consultation. Interviews of medical and mental health staff confirmed any information related to sexual victimization or abusiveness that occurred in the institution is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments. Informed consent is obtained from inmates before reporting about prior sexual victimization that did not occur in an institutional setting.

#### **Standard 115.82 Access to emergency medical and mental health 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Per GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 states inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment; inmate victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate; and qualified medical practitioners are on duty 24 hours. Upon returning from the hospital a registered nurse evaluates and documents the inmate's health status, and refers the inmate for mental health services. The inmate is prioritized for sick call and if the emergency room does not complete testing sexually transmitted diseases, testing is done at the facility.

Per GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires inmate victims of sexual abuse shall receive timely, unimpeded access to outside emergency medical exams without financial costs. The services at no costs are provided regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Forensic exams are done for up to 72 hours since the time of the incident. Interviews of staff confirmed they received timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Victims of alleged sexual assaults are sent to medical, pending transportation to Odessa Regional Medical Center for a forensic examination by SAFE/SANE when necessary. The institution previously used the Scenic Mountain Medical Center. There was no forensic exam in the last 12 months, but the auditor reviewed the documentation from a 2015 case that a forensic exam was performed by a SAFE/SANE at Scenic Mountain Medical Center.

### **Standard 115.83 Ongoing medical and mental health care for sexual abuse victims and abusers**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

Based on review of GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005; and interviews with staff and inmates; and medical and mental health documentation demonstrate Big Springs Correctional Center offers medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse. Big Springs Correctional Center provides victims with medical and mental health services consistent with the community level of care. The facility offers medical and mental health evaluation and treatment to all inmates who have been victimized by sexual abuse. They will be offered prophylactic treatment and follow-up for sexually transmitted or other communicable diseases, counseling and testing and referred to the mental health staff for crisis intervention as necessary. Treatment is at no costs to the inmates and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Mental health evaluations are conducted on all known inmate on inmate abusers within 60 days of learning such abuse.

Standards 115.83 (d) and (e) are non-applicable as Big Springs Correctional Center is a male only facility.

### **Standard 115.86 Sexual abuse incident reviews**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance**

**determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 identifies the minimum members of the review team, and covers the process for sexual abuse incident reviews to include a form the review team uses that addresses whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the institution; whether physical barriers in the area may enable abuse; the adequacy of staffing levels in that area during different shifts; and whether monitoring technology should be deployed or augmented to supplement supervision by staff. The auditor reviewed three incident reviews (2015, 2016, 2017) prior to the audit and five more on-site. The review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. GEO has an excellent PREA after action review form that addresses all elements of the standard. Incident review team members were interviewed and were very knowledgeable of the process.

### **Standard 115.87 Data collection**

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

**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires the collection of uniform data that provides the minimum data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. The agency collects accurate uniform data for every allegation of sexual abuse at facilities under its control using a standardized instrument. GEO collects accurate uniform data for every allegation of sexual abuse at facilities under its control using standardized instruments. GEO facilities provide monthly reports and PREA surveys to GEO headquarters. A monthly PREA Incident Tracking log is used to collect and provide the GEO PREA Coordinator data on sexual abuse and harassment incidents. Per conversation with GEO staff the data is aggregated. Upon request from DoJ, GEO provides the data. The auditor reviewed the Big Springs Correctional Center 2015, 2016, and 2017 PREA tracking log, GEO 2015 and 2016 annual PREA report, FBOP 2015 annual PREA report, and the GEO PREA Portal Survey Data. Review of previous DoJ Survey of Sexual Violence reports, annual GEO PREA reports, and data submitted by the institution demonstrated the agency collects uniform data to be used by GEO and FBOP.

GEO does not contract its inmates to other facilities (115. 87 (e)).

### **Standard 115.88 Data review for corrective action**

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion**

**must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 requires GEO to review the data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies; and to identify problem areas and take corrective actions. GEO prepares and publishes an annual report. GEO also provides Big Springs Correctional Center information and data to the FBOP for their annual PREA report.

The GEO annual report is very comprehensive in scope, provides data, an assessment of its PREA program and areas of focus, and includes the agency's progress in meeting the PREA Standards. The GEO home page has a PREA link to its PREA page that lists its PREA related policies, reporting information, and the GEO annual report. The auditor previously reviewed the GEO 2013, 2014, 2015, and 2016 PREA annual reports. GEO continues to publish one of the better annual reports the audit team has reviewed. The GEO PREA annual report includes a comparison of current and previous year data; an assessment GEO's effectiveness of its sexual abuse prevention, detection, and response policies and actions to eliminate sexual abuse and sexual harassment. The GEO website PREA tab is easy to find, and is very informative.

The auditor reviewed the FBOP annual 2015 report, Big Springs Correctional Center data was listed.

### **Standard 115.89 Data storage, publication, and destruction**

- 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)

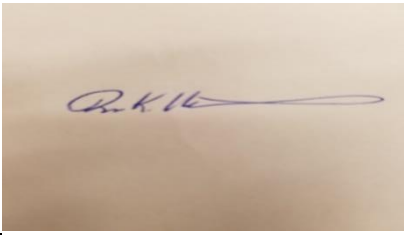
**Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.**

GEO Policy 5.1.2-A and Big Springs Correctional Center Policy INM 12.005 website, storage of documents at the facility, and interviews of staff it is determined data is properly stored, maintained and secured. Access to data is controlled. Aggregate data on all its facilities is available to the public through its website. All GEO institution data is in the annual report and posted on the website, only the last report is posted. GEO maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of the initial collection in accordance with the GEO Retention Records Schedule. Before making aggregated sexual abuse data publicly available, GEO removes all personal identifiers.

### **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 inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.



Auditor Signature

24 September 2017

Date