

ADULT PRISONS & JAILS



Name of facility:		D Ray James Correctional Facility	
Physical address:		3262 Hwy 253 East Folkston, Georgia 31537	
Date report submitted:		February 5, 2015	
Auditor Information		Katherine Brown	
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Date of facility visit:		February 2-4, 2015	
Facility Information			
Facility mailing address:		same	
Telephone number:		912-496-6242	
D Ray James Correctional Facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input checked="" type="checkbox"/> Federal
	<input checked="" type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Jail	<input type="checkbox"/> Prison	
Name of PREA Compliance Manager:		Ashley Reynolds	Title: Act. Executive Asst.
Email address:		areynolds@geogroup.com	Telephone number: 912-276-0655
Agency Information			
Name of agency:		D Ray James Correctional Facility Inc.	
Governing authority or parent agency			
Physical address:		One Park Place, Suite 700 621 NW 53 rd St Boca Raton, Florida 33487	
Mailing address:		same	
Telephone number:			
Agency Chief Executive Officer			
Name: George Zoley		Title:	Chairman of the Board, CEO and Founder
Email address: gzoley@geogroup.com		Telephone number:	561-893-0101
Agency-Wide PREA Coordinator			
Name: Phebia Moreland		Title:	Director, Contract Compliance, PREA Coordinator
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AUDIT FINDINGS

NARRATIVE:

The audit of D Ray James Correctional Facility was conducted on February 2-4, 2015 by Katherine Brown, Certified PREA auditor. The areas toured were a total of nine housing units containing 34 general population pods. There is one segregation housing unit. I also toured the kitchen, laundry, programs area, and work areas.

An entrance meeting was held with facility staff. The following people were in attendance: Ashley Reynolds, PREA Compliance Coordinator; Kenneth Gray, Compliance Administrator; Doug Wombacher, AW Operations; Kym Ball, AW Finance; Efren Pantoja, Chief of Security; Robyn Cross, Health Services Administrator; Phebia Moreland, GEO PREA Coordinator; Tracy Johns, Warden; Craig Chalmers, AW Programs; Debbie Lohr, BOP Secure Oversight Monitor; Regenia Graves, Training; David Lindsay, Security.

Following the entrance meeting I toured the D Ray James Correctional Facility from 08:30 – 12:00pm. On the tour with me was, Ashley Reynolds, PREA Compliance Coordinator; Kenneth Gray, Compliance Administrator; Doug Wombacher, AW Operations; Efren Pantoja, Chief of Security; Phebia Moreland, GEO PREA Coordinator; Tracy Johns, Warden; Craig Chalmers, AW Programs; Debbie Lohr, BOP Secure Oversight Monitor; David Lindsay, Security; Amanda Newman, Security.

I asked for an alpha listing of all inmates housed at D Ray James Correctional Facility and randomly selected inmates from each housing unit as well as any inmates who were limited English speaking or had hearing/vision impairment to be interviewed. I interviewed a total of 35 inmates. I interviewed one blind inmate, one inmate who spoke Russian, one inmate who spoke Portuguese and nineteen Spanish speaking inmates using the Language Line. Most of the inmates housed at this facility are limited English speaking inmate. I also asked for any inmate who was transgender/intersex, there were no transgender/intersex inmates. I asked for a shift roster and randomly selected sixteen staff to interview.

On day one I conducted the tour of the facility and completed all specialized interviews. On day two of the audit I conducted all the inmate interviews and did the evening shift staff interviews. Day three of the audit I came in early and conducted the morning watch and day watch interviews, reviewed investigative files; personnel records and training records. I also conducted a telephone interview with a volunteer.

I received one letter from an inmate claiming his PREA case was not handled correctly or timely. This case involved a staff member looking at him in the shower and making inappropriate comments to other inmates. I interviewed him as well as the SIS Investigator and reviewed the investigative case file. During the investigation he told the investigator that he did not feel sexually harassed or abused he felt like it was inappropriate behavior. The case was determined to be unsubstantiated because there is no audio system and there are no cameras in the showers. Some of the documents he sent me regarding the mental health staff dated 3 months prior to the alleged incident and had nothing to do with the PREA investigation.

There were 23 sexual assault/harassment allegation cases, all relatively recent (within the past year) nineteen had been unfounded; there are unsubstantiated and one was substantiated.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The D Ray James Correctional Facility is a low security male facility housing a total of 2,333 inmates located in Folkston, Georgia (approximately 50 miles from Jacksonville, Florida) on 104 acres. In January 2010 D Ray James Correctional Facility was awarded a Federal Contract with the Bureau of Prisons to house level 1 inmates. Over 240 new employees were hired at D Ray James Correctional Facility to meet requirements of the Bureau of Prisons and to transition from the previous inmate population (Georgia inmates) to BOP inmates. The D Ray James Correctional Facility took over operations in August 2010.

D Ray James Correctional Facility was named after D. Ray James, a local educator and Mayor of Folkston for 16 years. D Ray James Correctional Facility has been additionally expanded and renovated over the years and now contains 16 buildings on two sides, referred to as the 1800 and the 780. There are a total of eight general population housing units and two Special Housing Units. The housing units generally contain two-man cells or an open bay dormitory design. The maintenance building, warehouse, training building, armory and lock shop is located outside the secure perimeter.

The results indicate:

Number of standards exceeded: 5

Number of standards met: 37

Number of standards not met: 0

Number of standards not applicable: 1

**Standard
number here**

115.11 Zero Tolerance

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. III. A. 1.a & B. 1 2; DRJCF 6.13.1 PREA III. A. 1.a & B. 1 2 and both Corporate and DRJCF Organization chart, interview with PREA Coordinator and PREA compliance manager and review of Organizational Chart.

D Ray James Correctional Facility has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines D Ray James Correctional Facility's approach to preventing, detecting, and responding to such conduct.

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

The GEO Group operates more than one facility; each facility has designated a PREA compliance manager with sufficient time and authority to coordinate D Ray James Correctional Facility's efforts to comply with the PREA standards

**Standard
number here**

115.12 Contracting with other agencies for confinement of inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2.A. III. A. 5 (a-b); DRJCF 6.13.1 III. A. 5 (a-b). Reviewed contract modification of the Federal Bureau of Prisons contract. Based on interview with agency's contract compliance manager.

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

Standard number here 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)

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

Based on policy 5.1.2. A. III. C 1 (a-c, f & g); DRJCF. 6.13.1 III. C 1 (a-c, f & g). Reviewed staffing plan; annual assessment and logs showing unannounced rounds. Based on interview with Warden: PREA Compliance Manager and PREA Coordinator.

D Ray James Correctional Facility has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect inmates against sexual abuse.

In circumstances where the staffing plan was not complied with, D Ray James Correctional Facility documented and justified all deviations from the plan.

D Ray James Correctional Facility completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed.

Based on thoroughness of annual report I find they exceed this standard.

Standard number here 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)

Not Applicable

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

DRJCF does not house youthful offenders.

Standard number here 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 comments, including corrective actions needed if does not meet standard

Based on policy 5.1.2. A. III. I. 1-9; DRJCF 6.13.1 III. I. 1-9. Viewed logbooks; PowerPoint training; training records and the Visitation Strip Search records.

D Ray James Correctional Facility does not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners. In the event a cross gender search is done D Ray James Correctional Facility documents all cross-gender strip searches and cross-gender visual body cavity searches. DRJCF has not had any cross gender strip searches or cross gender visual body cavity searches.

D Ray James Correctional Facility has policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit.

D Ray James Correctional Facility does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. There have been no transgender/intersex inmates housed at this facility.

D Ray James Correctional Facility trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

Standard number here	115.16 inmates with disabilities and limited English speaking
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. E. 1 (a-c); DRJCF 6.13.1 III. E. 1 (a-c). Viewed roster of Spanish speaking staff; Language Line contract; TDD; Inmate Handbook English/Spanish; Admission & Orientation Packet English/Spanish; Google translation and PowerPoint training on Inmates with Disabilities. Based on random inmate and staff interviews and interview with limited English speaking inmates.

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

D Ray James Correctional Facility does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety.

Standard number here 115.17 Hiring and promotion decisions

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

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

Based on 5.1.2. A. III. C 2, (a-d) and H 4 (a-c); DRJCF 6.13.1 III. C 2, (a-d) and H 4 (a-c). Reviewed annual Performance Evaluation disclosure waiver; and Application PREA questions. Based on interview with Human Resource Director, and reviewed Hiring packet with PREA questions. Review of personnel files and checks of criminal records being performed.

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

D Ray James Correctional Facility considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

D Ray James Correctional Facility performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates performs a records check at least every five years of current employees and contractors who may have contact with inmates. DRJCF has not been under federal contract for 5 years, therefore no 5 year background checks have been completed, but policy is in place. There is a schedule in place to conduct the 5 year background checks this year.

Standard number here 115.18 Upgrades to facilities and technology

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. C – 3; DRJCF 6.13.1 III. C – 3; Reviewed PREA Annual Facility Assessment; Purchase Orders for Camera’s 11 cameras ordered October and November 2014 and 12 ordered January 2015. Based on interview of agency head and warden.

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

Standard number here 115.21 evidence protocol and forensic medical exams

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. III. D 1-8; DRJCF 6.13.1 III. D 1-8; Reviewed Sexual Assault Advocate Training. Based on interview with PREA compliance manager.

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

D Ray James Correctional Facility offers all victims of sexual abuse access to forensic medical examinations, through Satilla Advocacy Services, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Nurse Examiners (SANEs). These exams are performed at the Mayo Clinic in Waycross.

D Ray James Correctional Facility makes available to the victim a staff victim advocate trained by the facility. There are documents in place showing the attempts being made by the facility to secure these services through Satilla Advocacy Services.

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

To the extent D Ray James Correctional Facility itself is not responsible for investigating allegations of sexual abuse, D Ray James Correctional Facility requests that the investigating agency follow the requirements listed above.

Standard number here 115.22 referrals of allegations for investigations

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

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

Based on policy 5.1.2. A. III. 1 a,d; DRJCF III. 1 a,d. & FBOP Program Statement 5324.11, 115.22 a-e. Reviewed OPR Referral – Staff on Inmate Sexual Assault; OIA referral; ongoing PREA log. Based on interview with agency head and investigative staff; reviewed investigations.

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

D Ray James Correctional Facility has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. D Ray James Correctional Facility publishes such policy on its website. D Ray James Correctional Facility documents all such referrals.

If a separate entity is responsible for conducting criminal investigations, such publication describes the responsibilities of both D Ray James Correctional Facility and the investigating entity.

Any Department of Justice component responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons or jails have in place a policy governing the conduct of such investigations.

Standard number here 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 comments, including corrective actions needed if does not meet standard

Based on policy 5.1.2. A. III. F. 1. (a-f); DRJCF 6.13.1 III. F. 1. (a-f). Reviewed 4 hour PREA Refresher Training; LMS Printout for PREA Refresher Training and PREA Basic Training Acknowledgement. Based on interview with random staff.

D Ray James Correctional Facility trains all employees who have contact with inmates on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;
- (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- (3) Inmates’ right to be free from sexual abuse and sexual harassment;
- (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with inmates;
- (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The training is tailored to the gender of the inmates at D Ray James Correctional Facility. The employees receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa.

D Ray James Correctional Facility documents, through employee signature, those employees understand the training they have received.

Standard number here	115.32 Volunteer and contractors training
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. G. 1 (a,b & d) & H. 1 (a,b, e,f); DRJCF 6.13.1 III. G 1 (b,c,e) H. 1 (b,c,f); PREA PowerPoint training for Volunteers & Contractors; Training Attendance Records. Based on interview with volunteer and contractors. Lesson Plan; Volunteer roster; training acknowledgement.

D Ray James Correctional Facility ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under D Ray James Correctional Facility’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of D Ray James Correctional Facility's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

D Ray James Correctional Facility has documentation confirming that volunteers and contractors understand the training they have received.

Standard number here 115.33 Inmate education

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. E. 2 (a-i); DRJCF 6.13.1 III. E. 2 (a-f). Reviewed A&O Packet; Inmate Handbook; Comprehensive Education Presentation Acknowledgement and viewed posters. Based on interview with random inmates and intake staff.

During the intake process, inmates receive information explaining D Ray James Correctional Facility's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

Within a week of intake, A&O staff provides a comprehensive education to inmates in person regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. This training occurs each Tuesday.

D Ray James Correctional Facility provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. There is documentation of inmate participation in these education sessions.

I find they exceed this standard based on the comprehensive education is completed face to face within 7 days instead of the 30 days the standard requires.

Standard number here 115.34 Specialized training: Investigators

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III F. 3 a-c; DRJCF 6.13.1 III F. 3 a-c. Reviewed PREA specialized Investigators Training Roster; LMS Basic PREA Training; LMS PREA Specialized Investigators. Based on interview with investigative staff. Review of Training Curriculum and Training certificates.

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

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

Any Department of Justice components that investigates sexual abuse in confinement settings are provide such training to its agents and investigators who conduct such investigations.

Standard number here	115.35 Specialized training: Medical and mental health care
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. F. 2 (a-d); DRJCF 6.13.1 III. F. 2 (a-d). Reviewed medical Staff Roster; LMS Basic PREA Training; Specialized PREA Training Acknowledgement; Medical staff PREA Medical and Mental Health Training Curriculum.

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

D Ray James Correctional Facility maintains documentation that medical and mental health practitioners have received the training.

Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers.

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. D-1 (a-i); DRJCF 6.13.1 III. D-1 (a-i); PREA Risk Assessment; PREA Vulnerability 30 day reassessment; Intake Processing Data Follow UP; PREA encounter form. Based on interview with random inmates and intake staff responsible for screening.

All inmates are assessed during an intake screening and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates.

Intake screenings take place usually within 24 hours of arrival at D Ray James Correctional Facility.

D Ray James Correctional Facility uses an objective screening instrument.

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

- (1) Whether the inmate has a mental, physical, or developmental disability;
- (2) The age of the inmate;
- (3) The physical build of the inmate;
- (4) Whether the inmate has previously been incarcerated;
- (5) Whether the inmate's criminal history is exclusively nonviolent;
- (6) Whether the inmate has prior convictions for sex offenses against an adult or child;
- (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- (8) Whether the inmate has previously experienced sexual victimization;
- (9) The inmate's own perception of vulnerability; and
- (10) Whether the inmate is detained solely for civil immigration purposes.

The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to D Ray James Correctional Facility, in assessing inmates for risk of being sexually abusive.

Within 30 days from the inmate's arrival at D Ray James Correctional Facility, D Ray James Correctional Facility reassesses the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by D Ray James Correctional Facility since the intake screening.

An inmate's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

Inmates are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked.

D Ray James Correctional Facility implements appropriate controls on the dissemination within D Ray James Correctional Facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates. Only command staff and the Unit Team has access to this information.

Standard number here 115.42 Use of screening information

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. D 3 (a-c); DRJCF 6.13.1 D. 2 (back) 3 (a-c). Reviewed population monitoring forms; Screening Instrument. Based on interview with PREA compliance manager and staff responsible for risk screening.

D Ray James Correctional Facility uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

D Ray James Correctional Facility makes individualized determinations about how to ensure the safety of each inmate.

In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, D Ray James Correctional Facility considers on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems. DRJCF has not had any transgender/intersex inmates.

Placement and programming assignments for each transgender or intersex inmate is reassessed at least twice each year to review any threats to safety experienced by the inmate.

A transgender or intersex inmate's own views with respect to his or her own safety are be given serious consideration.

Transgender and intersex inmates are be given the opportunity to shower separately from other inmates. All of the showers at D Ray James Correctional Facility are single showers.

D Ray James Correctional Facility does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such

identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

Standard number here 115.43 Protective custody

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

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

Based on policy 5.1.2. A. III. J. 1 (a-f); DRJCF 6.13.1 J. 1 (a-e). Based on interview with warden, staff who supervise segregated inmates.

Inmates at high risk for sexual victimization are not placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. DRJCF has not placed any inmates in the SHU solely because of a risk for sexual victimization.

Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If D Ray James Correctional Facility restricts access to programs, privileges, education, or work opportunities, D Ray James Correctional Facility documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.

D Ray James Correctional Facility assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment are not ordinarily exceed a period of 30 days. If involuntary segregated housing assignment is made D Ray James Correctional Facility clearly documents the basis for D Ray James Correctional Facility's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Every 30 days a review is performed to determine whether there is a continuing need for separation from the general population.

Standard number here 115.51 Inmate reporting

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

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

Based on 5.1.2. A. III K. 1 (a-c); DRJCF 6.13.1 III. K. 1 (a-c). Reviewed How to Report handout; Inmate How to Report Sexual Abuse; Third Party Reporting Poster; verbal report OPR14-0785. Based on interviews with random staff and inmates.

D Ray James Correctional Facility provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

D Ray James Correctional Facility provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of D Ray James Correctional Facility, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request.

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

D Ray James Correctional Facility provides a method for staff to privately report sexual abuse and sexual harassment of inmates.

Standard number here 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 comments, including corrective actions needed if does not meet standard

Based on policy 5.1.2. A. III. K. 2 (a-c); DRJCF 6.13.1 K. 2 (a-b); DRJCF 6.8.1. Administrative Remedy Procedure; FBOP Program Statement 1330.18. Reviewed Administrative Remedy; Informal Resolution Attempt; Inmate Handbook-Grievance.

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

D Ray James Correctional Facility does not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

D Ray James Correctional Facility ensures that an inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint.

D Ray James Correctional Facility issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and are also be permitted to file such requests on behalf of inmates.

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

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, D Ray James Correctional Facility immediately forwards the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action is taken, and provides an initial response within 48 hours, and issues a final agency decision within 5 calendar days. The initial response and final agency decision documents D Ray James Correctional Facility's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

D Ray James Correctional Facility may discipline an inmate for filing a grievance related to alleged sexual abuse only where D Ray James Correctional Facility demonstrates that the inmate filed the grievance in bad faith.

**Standard
number here**

115.53 Inmate access to outside confidential support services

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

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

Based on policy 5.1.2. A. III. L -8 (a-d); DRJCF 6.13.1 L. 8 (a-d). Reviewed MOU DRJCF & Mayo Clinic Health Systems in Waycross; Email correspondence; Inmate posting (RAIN) Rape, Abuse, & Incest National Network; Victims Advocate Certificate. Based on interview with random inmates and inmates who reported sexual assault.

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

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

D Ray James Correctional Facility has made attempts to enter into memoranda of understanding with Satilla Advocacy Services.

Standard number here 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 comments, including corrective actions needed if does not meet standard

Based on policy 5.1.2. A. III K-3; DRJCF 6.13.1. Viewed GEO Website and Reviewed How To Report an Incident of Sexual Assault handout and posters.

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

Standard number here 115.61 Staff and agency reporting duties

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

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

Based on policy 5.1.2. A. III. K. 4 (a-c); DRJCF 6.13.1 K. 4 (a-c); GA Code Annotated 30-5-8. Based on interviews with random staff; warden and medical/mental health staff

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

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

If the alleged victim is under the age of 18 or considered a vulnerable adult under Ga.Code Annotated 30-5-8 State vulnerable persons statute, D Ray James Correctional

Facility reports the allegation to the designated State or local services agency under applicable mandatory reporting laws.

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

Standard number here 115.62 Agency protection duties

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

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

Based on 5.1.2. A. III. L. 1; DRJCF 6.13.1 L. 1. Reviewed Initial After Action Review. Based on interviews with random staff and warden.

When D Ray James Correctional Facility learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the inmate.

Standard number here 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 comments, including corrective actions needed if does not meet standard

Based on 5.1.2. A. III. L 5 (a-c); DRJCF 6.13.1 III. L 5 (a-c). Based on interview with agency head and warden.

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

Standard number here 115.64 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 comments, including corrective actions needed if does not meet standard

Based on 5.1.2. A. III L-2 (a-f); DRJCF 6.13.1 L. 2. 9 (a-f). Reviewed First Responder Cards. Based on interview with security staff who are first responders, random staff and inmates who reported sexual abuse and review of Incident Reports

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

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

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

Standard number here	115.65 Coordinated response
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- X Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III A-4; DRJCF 6.13.1 III A.4. PREA Coordinated Response Plan; PREA Incident Checklist. Based on interview with warden

D Ray James Correctional Facility has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

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

**Standard
number here**

115.66 Preservation of ability to protect inmates from contact with abusers

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

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

Based on 5.1.2. A. III. A. 3 ; DRJCF 6.13.1 III. A. 3. Reviewed Collective Bargaining Agreement Article 14 Just Cause and PREA Initial After Action Report. Based on interview with agency head.

Neither D Ray James Correctional Facility nor any other governmental entity responsible for collective bargaining on D Ray James Correctional Facility's behalf entered into or renewed any collective bargaining agreement or other agreement that limits D Ray James Correctional Facility's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. DRJCF has not issued any disciplinary sanctions to staff for staff related PREA violations.

**Standard
number here**

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

Based on 5.1.2. A. III. M 2; DRJCF 6.13.1 III. M.2. Reviewed Protection from Retaliation Log 05350-379 Based on interview with agency head, warden, designated staff member responsible for monitoring retaliation.

D Ray James Correctional Facility has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and are designate which staff members or departments are charged with monitoring retaliation.

D Ray James Correctional Facility has multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, D Ray James Correctional Facility monitors the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and act promptly to remedy any such retaliation. There is periodic status checks performed. Items D Ray James Correctional Facility monitors include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. D Ray James Correctional Facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

In the case of inmates such monitoring includes weekly monitoring visits by the PREA Compliance Manager.

If any other individual who cooperates with an investigation expresses a fear of retaliation, D Ray James Correctional Facility takes appropriate measures to protect that individual against retaliation.

Standard number here 115.68 Post allegation protective custody

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

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

Based on policy 5.1.2. A. III L 6; DRJCF 6.13.1 III. L. 6. Based on interview with warden. No inmate has been placed in involuntary segregation.

Any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse receives all the same rights and privileges as general population inmates.

Standard number here 115.71 Criminal and administrative agency investigation

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

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

Based on policy 5.1.2. A. III B 1 (d) and (b) 2 (a); DRJCF 6.13.1 III B 1 (d) and (b) 2 (a); FBOP Program Statement 5324.11. Reviewed PREA Investigation Report Case #14-0012. Based on interview with investigative staff. Review of investigation files.

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

Where sexual abuse is alleged, D Ray James Correctional Facility uses investigators who have received special training in sexual abuse investigations.

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

When the quality of evidence appears to support criminal prosecution, D Ray James Correctional Facility conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. These cases are referred to the FBI or Conner Sheriff's Office for criminal prosecution.

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

Administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. The Office of Professional Regulations conducts these investigations in conjunction with the in-house investigator.

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

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

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

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

**Standard
number here**

115.72 Evidentiary standard for administrative investigation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. III B 2 (a & d); DRJCF 6.13.1 III. B 2 (a & d). Reviewed Investigation Report 14-0839. Based on interview with investigative staff. Review of investigation files.

D Ray James Correctional Facility imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

**Standard
number here**

115.73 Reporting to inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2.III K; DRJCF 6.13.1 III. K. Reviewed Notification of Outcome of Allegation P14-019 & P14-012. Based on interview with warden; investigative staff.

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

If D Ray James Correctional Facility did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the inmate.

Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, D Ray James Correctional Facility subsequently informs the inmate (unless D Ray James Correctional Facility has determined that the allegation is unfounded) whenever the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at D Ray James Correctional Facility; D Ray James Correctional Facility learns that the staff member has been indicted on a charge related to sexual abuse within D Ray James Correctional Facility; or D Ray James Correctional Facility learns that the staff member has been convicted on a charge related to sexual abuse within D Ray James Correctional Facility.

Following an inmate's allegation that they had been sexually abused by another inmate, D Ray James Correctional Facility subsequently informs the alleged victim whenever D Ray James Correctional Facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within D Ray James Correctional Facility; or D Ray James Correctional Facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within D Ray James Correctional Facility .

All such notifications or attempted notifications are documented.

An agency's obligation to report under this standard are terminate if the inmate is released from D Ray James Correctional Facility's custody.

Standard number here 115.76 Disciplinary sanctions for staff

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

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

Based on policy 5.1.2. III L. 1.; DRJCF 6.13.1 III. L.1. ; FBOP 5324.11. Employee Handbook.

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

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

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

Standard number here 115.77 Corrective action for contractors and volunteers

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

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

Based on policy 5.1.2. A. III H 3; DRJCF 6.13.1 III. H. 3 Based on interview with warden.

Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

D Ray James Correctional Facility takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Standard number here 115.78 Disciplinary sanctions for inmates

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

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

Based on 5.1.2. III L 2 (a-i); DAJCF 6.13.1 III. L. 2 (a-i); FBOP Program Statement 5324.11. Reviewed Inmate Handbook; PREA Investigation Report 14-0012; Incident Report #2631581; Prohibited Acts and Sanctions. Based on interview with medical/mental health staff.

Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

The disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his behavior when determining what type of sanction, if any, should be imposed.

D Ray James Correctional Facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse.

D Ray James Correctional Facility disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

A report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred are not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

D Ray James Correctional Facility prohibits all sexual activity between inmates and may discipline inmates for such activity.

Standard number here 115.81 Medical and Mental health screening; history of sexual abuse

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III D 2; DRJCF 6.13.1 III. D. 2. Reviewed PREA Initial Screening Instrument; 30 day RE-assessment; Mental Health Assessment and emails regarding investigations. Based on interview with staff responsible for risk screening and medical/mental health staff. Reviewed Sexual Risk Indicator Screening

If the screening indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

If the screening indicates that an inmate has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.

Any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

Medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting.

Standard number here	115.82 Access to emergency medical and mental health services
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III L 7; DRJCF 6.13.1 III. L. 7. Reviewed medical report of injuries/non injuries and SANE exams. Based on interview with medical and mental health staff and inmates who reported sexual abuse.

Inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.

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

victim and are immediately notify the appropriate medical and mental health practitioners.

Inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

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

Standard number here 115.83 ongoing medical and mental health care for sexual abuse victims

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

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

Based on policy 5.1.2. III M 1; DRJCF 6.13.1 III. M. 1. Based on interview with medical/mental health staff and inmates who reported sexual assault.

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

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

D Ray James Correctional Facility provides such victims with medical and mental health services consistent with the community level of care.

Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. I reviewed one inmate record showing HIV testing being performed.

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

Standard number here 115.86 Sexual abuse incident reviews

- Exceeds Standard (substantially exceeds requirement of standard)

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

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

Based on policy 5.1.2. A. III. M. 3; DRJCF 6.13.1 III. M. 3. Based on interview with warden, PREA compliance manager; incident review team and reviewed After Action Report. Excellent PREA after action review form that addresses all elements of the standard. D Ray James Correctional Facility conducts an IRT for all cases Substantiated, Unsubstantiated and Unfounded cases.

D Ray James Correctional Facility conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

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

Based on your after action report I find you exceed in this standard.

Standard number here	115.87 Data collection
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. N. 1.; DRJCF 6.13.1 III. N. 1. Reviewed annual report for 2013 & 2014, also reviewed monthly PREA incident tracking log form; DoJ Survey of Sexual Violence; FBOP Annual Report.

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

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

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

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

Upon request, D Ray James Correctional Facility provides all such data from the previous calendar year to the Department of Justice no later than June 30. No request has been made.

Standard number here 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 comments, including corrective actions needed if does not meet standard

Based on policy 5.1.2. A. III. N 2.(a-d); DRJCF 6.13.1 III. N. 2. Reviewed FBOP Annual Report; DRJCF Annual PREA Report. Based on interview with PREA coordinator and PREA Compliance Manager and Warden.

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

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

D Ray James Correctional Facility's report is approved by D Ray James Correctional Facility head and made readily available to the public through its website www.geogroup.com/reporting/prea

Standard number here 115.89 Data storage, publication and destruction

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III N. 3.; DRJCF 6.13.1 III. N.3. Reviewed FBOP Annual Report; DRJCF Annual PREA Report.

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

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

AUDITOR CERTIFICATION:

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

Katherine Brown

February 5, 2015

Auditor Signature

Date