

# PREA AUDIT: AUDITOR'S SUMMARY REPORT

## ADULT PRISONS & JAILS

Interim     Final Report

### Auditor Information

**Auditor name:** Katherine Brown

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**Telephone number:** 727-470-4123

**Date of facility visit:** July 20- 21, 2016

**Date report submitted:** July 22, 2016

### Facility Information

**Name of facility:** Golden State Modified Community Correctional Facility (GSMCCF)

**Physical address:** 611 Frontage Rd. McFarland, CA

**Telephone number:** 661-792-2731

<b>Golden State MCCF is:</b>	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input checked="" type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		

<b>Facility Type:</b>	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison
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<b>Name of facility's Chief Executive Officer:</b> Wanda Wilson	<b>Title:</b>	Warden
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**Number of staff assigned to Golden State MCCF in the last 12 months:**

**Designed facility capacity:** 700

**Current population of facility:** 661

**Facility security levels/offender custody levels:** Medium, Minimum

**Age range of the population:** 18-72

<b>Name of PREA Compliance Manager:</b> Jennifer Martinez	<b>Title:</b>	PCM
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<b>Email address:</b> <a href="mailto:jenmartinez@geogroup.com">jenmartinez@geogroup.com</a>	<b>Telephone #</b>	661-792-2731
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### Agency Information

**Name of agency:** The GEO Group Inc.

**Governing authority:**

**Physical address:** One Park Place, Suite 700, 621 Northwest 53<sup>rd</sup> Street, Boca Raton Florida 33487

**Mailing address:** N/A

**Telephone number:** 561-893-0101

### Agency Chief Executive Officer

<b>Name:</b> George C. Zoley	<b>Title:</b>	CEO & Founder
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<b>Email address:</b> <a href="mailto:gzoley@geogroup.com">gzoley@geogroup.com</a>	<b>Telephone number:</b>	561-893-0101
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### Agency-Wide PREA Coordinator

<b>Name:</b> Phebia L. Moreland	<b>Title:</b>	Director, Contract Compliance, PREA Coordinator
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<b>Email address:</b> <a href="mailto:pmoreland@geogroup.com">pmoreland@geogroup.com</a>	<b>Telephone #</b>	561-999-5827
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# AUDIT FINDINGS

## NARRATIVE:

The audit of Golden State MCCF was conducted on July 20-21, 2016 by Katherine Brown, Certified PREA auditor. Prior to the onsite I received all the policies and documentation on June 26, 2016 to review and requested additional documentation to satisfy the standards. Received additional documentation on July 7, 2016 and completed the initial review.

The areas toured were a total of 8 housing units. There are 8 dorms all direct supervision and one detention/segregation unit plus the kitchen, laundry, programs area, and work areas.

An entrance meeting was held with facility staff. The following people were in attendance: Jennifer Martinez, Compliance Administrator & PREA Manager; Bobby Bodirsky, Chief of Security.

Following the entrance meeting I toured the Golden State MCCF from 09:15 -10:15. On the tour with me was Jennifer Martinez, Compliance Administrator & PREA Manager; Bobby Bodirsky, Chief of Security.

During the tour all facility notices were posted in all offender living areas; program areas and public areas announcing the audit. As I entered all offender living area cross gender announcements were made.

I asked for an alpha listing of all offenders housed at Golden State MCCF and randomly selected 28 offenders as well as any offenders who were limited English speaking or had hearing/vision impairment to be interviewed, I interviewed 8 limited English speaking offenders. I also asked for any offender who was transgender/intersex, there were none, I did interview one offender who identified as gay and 2 bi-sexual offenders. I also asked for a shift roster and randomly selected 15 staff to interview plus 14 specialized interviews.

There were 5 sexual assault/harassment allegation cases, all relatively recent (within the past year) 1 had been unfounded; 1 unsubstantiated and 3 are still open.

## DESCRIPTION OF FACILITY CHARACTERISTICS:

Golden State Modified Community Correctional Facility (MCCF) is located at 611 Frontage Road, McFarland, CA. which is approximately 126 miles north of Los Angeles. It is a medium security facility designed to house custody inmates and parole violators for the California Department of Corrections & Rehabilitation (CDCR). GEO is one of McFarland's largest employers, second only to the Department of Education. GEO made a commitment to local residents to recruit locally, and over 80% of the facility staff was hired from McFarland and surrounding communities.

The 96,963 sq. ft., one-story masonry building was financed, designed and built by GEO on 20 acres of land. It has a health care unit and rooms for classroom instruction, counseling, and visitation. Educational areas include a computer laboratory, a library, and indoor and outdoor recreational areas. A fully equipped kitchen provides meal service for all inmates and staff. Inmate housing is arranged in dormitory style, with 8 dorms each with 40 single bunks and 20 double bunks. The dormitory style facility has 2 dorms with 86 beds and 6 dorms with 88 beds, and an additional 13 single-bunked cells for inmate segregation. Two cells with single bunks are reserved for medical purposes.

The facility design enables modern correctional techniques such as direct supervision. The building perimeter and control centers utilize state-of-the-art electronic surveillance and detection techniques. Security enhancement measures include a central control room that contains CCTV monitors allowing staff to survey interior as well as perimeter areas. Housing units are designed so that inmates can move about freely under the direction of officers who monitor their activities and movement between areas.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 3

Number of standards met: 38

Number of standards not met:

Number of standards not applicable: 2

§115.11

Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy 5.1.2 III. A. B 1&2; GSMCCF 6. H. 03; GEO Organizational Chart and GSMCCF Organizational Chart and interviews with PREA Coordinator and PREA compliance manager I find they meet this standard.

The GEO Group has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines The GEO Groups' approach to preventing, detecting, and responding to such conduct. Golden State MCCF complies with this standard by utilizing GSMCCF 6. H. 03. This policy mandates zero tolerance toward all forms of sexual misconduct and is used to prevent, detect, and respond to any form of sexual abuse and sexual harassment.

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 the facility's efforts to comply with the PREA standards. Golden State MCCF complies with this standard by appointing a staff person as the designated the PREA Compliance manager for Golden State MCCF by the Facility Administrator.

§115.12

Contracting with other agencies for confinement of offenders

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 review of 5.1.2 A V. 5 and contract with California Department of Corrections and Rehabilitation and interview with agency's contract compliance manager I find they meet this standard.

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

Any new contract or contract renewal provides for agency contract monitoring to ensure that the contractor is complying with the PREA standards.

GSMCCF has not had any new contracts or contract renewals allowing for such language change.

§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 review of 5.1.2. A. III. C; GSMCCF 6.H.03 pg. 7 # 5&6; staffing plan; Unannounced rounds; 2015 Annual facility assessment; staff roster assignments; and interview with Warden; PREA Compliance Manager and PREA Coordinator.

Golden State MCCF 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 offenders against sexual abuse.

In circumstances where the staffing plan was not complied with, Golden State MCCF documented and justified all deviations from the plan on the shift roster assignments. Golden State MCCF has had no deviations from their staffing plan during the past 12 months.

The GEO Group completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed.

§115.14 Youthful offenders

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Not applicable standard

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

Golden State MCCF does not house juveniles. At the time of the audit there were no youthful offenders housed at Golden State MCCF.

§115.15 Limits to cross gender viewing and searches

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of policy 5.1.2. A. III. I. 1-8; GSMCCF 6. H. 03 V. K.; CDCR Lesson Plan for PREA; Orientation Sign in Sheet; Logbooks of Opposite Gender announcements and interviews with random staff and offenders I find they meet this standard.

Golden State MCCF 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 circumstance. In the event a cross gender search is done Golden State MCCF documents all cross-gender strip searches and cross-gender visual body cavity searches. There have been no instances of cross gender strip searches. During random staff and offender interviews it was confirmed staff do not perform cross gender strip searches.

Golden State MCCF has policies and procedures that enable offenders 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 offender housing unit. During the random offender interviews it was confirmed that offenders have privacy to perform bodily functions and cross gender staff announcements were made as I entered the dorms on the tour.

Golden State MCCF does not search or physically examine a transgender or intersex offender for the sole purpose of determining the offender's genital status. If the offender's genital status is unknown, it is determined during conversations with the offender, 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 were no transgender offenders at the prison at the time of the audit but based on staff interviews transgender/intersex offenders would not be searched for sole purpose of determining the offender's genital status.

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

§115.16	Offenders 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) GSMCCF 6. H. 03 V G; TDD; CDCR PREA Pamphlets English/Spanish; Posters; CDCR PREA Training Curriculum and interviews with random offender and staff and interviews with limited English speaking offenders I find they meet this standard.

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

Golden State MCCF does not rely on offender interpreters, offender readers, or other types of offender assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the offender's safety. None have been used or required. The PREA Pamphlet is in both English/Spanish. Golden State MCCF has a contract with the Language Services to provide translation for other languages as well as sign language for the deaf. During the interviews with the non-English speaking offenders it was discovered that while they knew how to report a PREA incident and they had received the packet which contains the PREA information their level of knowledge was not the same as the English speaking offenders. I discussed the need for Receiving and Release (R&R), to ensure when an offender arrives an assessment is done to determine the level of comprehension the offender has. This would include language they spoke as well as deaf or vision impaired and to ensure the appropriate level of training is provide to these individuals.

§115.17	Hiring and promotion decisions
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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

The GEO Group performs a criminal background records check before enlisting the services of any contractor who may have contact with offenders. All background checks are done on a live scan which once the fingerprints are entered into live scan if at any time an employee is arrested a report is automatically sent to the facility advising them of the arrest. Volunteer's background screening is done annually by the executive secretary. Based on the immediate notification I find they exceed in this standard.

§115.18	Upgrades to facilities and technology
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of 5.1.2. A. III. GSMCCF 6. H.03 V. C and interview with agency head and Facility Administrator I find they meet this standard.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, The GEO Group considers how such technology may enhance The GEO Group's ability to protect offenders from sexual abuse. There have been no substantial or modifications to existing facilities. Golden State MCCF currently utilizes cameras to prevent sexual abuse and investigate allegations of wrongdoing.

16 new cameras were installed in the CDC Trailers to provide better coverage.

Golden State MCCF has not had any substantial physical plant modifications during this audit period.

§115.21	Evidence protocol and forensic medical exams
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of policy 5.1.2. E. III. D; GSMCCF 6. H. 03A V. D; MOU with Forensic Nurse Specialist of Central California and interview with PREA compliance manager I find they meet this standard.

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

Golden State MCCF offers all victims of sexual abuse access to forensic medical examinations, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Forensic Examiners (SAFEs) Forensic Nurse Specialist of Central California.

If an inmate is a victim of sexual assault Golden State MCCF will transfer the victim to the HUB which is North Kern State Prison. Just Detention International is working on an MOU with Alliance Against Family Violence who will provide victim advocacy services to the victim. The California Department of Corrections Captain interviewed ensured that this process was in place and that



the Alliance Against Family Violence has verbally agreed to provide these services pending final signatures.

As requested by the victim, the victim advocate, shall accompany and support the victim through the forensic medical examination process and investigatory interview and shall provide emotional support, crisis intervention, information and referrals. The interview with the California Department of Corrections Captain stated that once a victim advocate was requested and assigned to the victim they would be provided with the appropriate telephone number and address to maintain communication.

§115.22	Policies to ensure referrals of allegations for investigations
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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 review of policy 5.1.2. E. III. A-1 a. 5.1.2. A. III. A-2; GSMCCF 6. H. 03 IV. A.2; CDCR Policy 1445 Investigation; 2016/2015 PREA Investigations Tracking Log; Referral of Allegations of Sexual Abuse/Harassment involving staff and interview with agency head and investigative staff I find they meet this standard.

Golden State MCCF ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Golden State MCCF has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to the Golden State MCCF who has the legal authority to conduct criminal investigations. The GEO Group publishes such policy on its website. The GEO Group documents all such referrals. The GEO Group ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Golden State MCCF follows the standards set forth by The GEO Group in policy number 5.1.2.E. The Department's response to sexual assault follows "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents." When an incident is reported, a physical examination of the alleged victim is conducted and SANE protocol is initiated. The Facility Administrator will immediately ensure an investigation is referred to the CDRC Internal Investigations Unit. Referrals to outside law enforcement agencies will be made with the cooperation of the Internal Investigations Unit. Golden State MCCF will conduct administrative investigations.

Such publication describes the responsibilities of both The GEO Group and the investigating entity on the GEO website [www.geogroup.com/reporting\\_sexual\\_abuse\\_PREA](http://www.geogroup.com/reporting_sexual_abuse_PREA) .

§115.31	Employee training
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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 review of policy 5.1.2. A. III. F. 1. (a-f); GSMCCF 6. H. 03 V H; CDCR Lesson Plan; PREA Training Acknowledgement; Sign in Roster and interview with random staff I find they meet this standard.

The GEO Group trains all employees who have contact with offenders 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) Offenders' right to be free from sexual abuse and sexual harassment;
- (4) The right of offenders 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 offenders;
- (9) How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming offenders; 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 offenders at Golden State MCCF. The employees receive additional training if the employee is reassigned from a facility that houses only male offenders to a facility that houses only female offenders, or vice versa.

Golden State MCCF documents, through employee signature verification, those employees understand the training they have received.

§115.32	Volunteer and contractors training
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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 review of policy 5.1.2. A. III. G. 1 (a-e) & H. 1 (a-f); GSMCCF 6. H. 03 V; Contractor/Volunteer Training Curriculum; Volunteer roster; Volunteer PREA Training Acknowledgment; Contracted staff roster; Contracted PREA Training Acknowledgment; and interview with volunteer and contractors I find they meet this standard.

Golden State MCCF ensures all volunteers and contractors who have contact with offenders have been trained on their responsibilities under The GEO Group'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 offenders, but all volunteers and contractors who have contact with offenders are notified of The GEO Group's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Golden State MCCF has documentation confirming that volunteers and contractors understand the training they have received.

§115.33	Offender education
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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 review of policy 5.1.2. A. III. E. 2 (a-j); GSMCCF 6. H. 03 V G 2; CDCR PREA Pamphlet English/Spanish; CDCR PREA Poster; CDCR 128 B Chrono & Inmate Receipt of Handbook; Verification of Orientation; PREA Inmate Orientation Lesson Plan and interview with random offenders and intake staff.

During the intake process, offenders receive information explaining The GEO Group's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

Within 30 days of intake, Golden State MCCF provides a comprehensive education to offenders through video 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.

The GEO Group provides offender education in formats accessible to all offenders, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to offenders who have limited reading skills. There is documentation of offender participation in these education sessions.

§115.34 Specialized training: Investigators

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 review of policy 5.1.2. A. III F. 3 a-c; GSMCCF 6. H. 03; PREA Specialized Training Curriculum; Training Rosters and Certificates of Specialized Investigators Training; PREA Training Acknowledgment and interview with investigative staff I find they meet this standard.

In addition to the general training provided to all employees Golden State MCCF 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. Golden State MCCF maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

§115.35 Specialized training: Medical and mental health care

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 review of policy 5.1.2. A. III. F. 2 (a-d); GSMCCF 6. H. 03 V. H. 2; Roster of Medical/Mental Health Staff; 2016 Training Plan; PREA Training Acknowledgement; Specialized Medical and Mental Health PREA Training Curriculum and interviews with medical staff I find they meet this standard.

Golden State MCCF ensures that all full and part-time medical 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.

The GEO Group maintains documentation that medical practitioners have received the training.

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

§115.41	Screening for risk of victimization and abusiveness
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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 review of 5.1.2. A. III. D-1 (a-g); GSMCCF 6. H. 03; PREA Risk Screening & 30 day Reassessment and interview with random offenders and intake staff responsible for screening I find they exceed this standard.

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

Intake screenings take place immediately upon arrival at Golden State MCCF.

Golden State MCCF uses an objective screening instrument.

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

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

Within 30 days from the offender's arrival at Golden State MCCF, Golden State MCCF reassesses the offender's risk of victimization or abusiveness based upon any additional, relevant information received by Golden State MCCF since the intake screening.

An offender'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 offender's risk of sexual victimization or abusiveness.

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

The GEO Group implements appropriate controls on the dissemination within Golden State MCCF of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the offender's detriment by staff or other offenders. Only limited staff has access to the risk screening form only Medical, Warden, Assistant Warden, Chief, Counselor and Lieutenant. All Risk Assessments are maintained in files and are kept locked.

Based on victim aggressor screening being done immediately upon arrival I find they exceed in this standard.

§115.42	Use of screening information
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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 review of policy 5.1.2. A. III. D. 1 (c-d) 3 (a-c); GSMCCF 6. H. 03 V F; PREA Risk Assessment Tracking; Risk Screening form and interview with PREA compliance manager and staff responsible for risk screening I find they meet this standard.

Golden State MCCF uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those offenders at high risk of being sexually victimized from those at high risk of being sexually abusive.

Golden State MCCF makes individualized determinations about how to ensure the safety of each offender.

The facility has not had any transgender/intersex offenders however there are policies in place that address the following:

In deciding whether to assign a transgender or intersex offender to a facility for male or female offenders, and in making other housing and programming assignments, The GEO Group considers on a case-by-case basis whether a placement would ensure the offender's health and safety, and whether the placement would present management or security problems.

Golden State MCCF did not have any transgender/intersex offender at the time of the audit however they had policies in place that addressed the following:

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

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

Transgender and intersex offenders are be given the opportunity to shower separately from other offenders.

Golden State MCCF does not place lesbian, gay, bisexual, transgender, or intersex offenders 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 offenders.

§115.43	Protective custody
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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 review of 5.1.2. A. III. J. 1 (a-f); GSMCCF 6.H.03 V. L and interview with Facility Administrator, staff who supervise segregated offenders I find they meet this standard.

Golden State MCCF has not placed any inmate in involuntary segregation due to a high risk of sexual victimization.

Golden State MCCF does not have a segregation unit. Offenders requiring protective custody or who are at high risk of sexual victimization would be placed in a transit holding cell pending transfer by CDCR.

Offenders 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.

§115.51	Offender reporting
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of 5.1.2. A. III K. 1 (a-c); GSMCCF 6. H. 03 V Q; Offender PREA Pamphlet; Posters; PREA Investigation Report and interviews with random staff and offenders I find they meet this standard.

Golden State MCCF provides multiple internal ways for offenders to privately report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. The PREA hotline number alerts CDCR who then contacts the facility.

Golden State MCCF provides at least one way for offenders to report abuse or harassment to a public or private entity or office that is not part of The GEO Group, and that is able to receive and immediately forward offender reports of sexual abuse and sexual harassment to agency officials, allowing the offender to remain anonymous upon request. Offenders can report to Office of Internal Affairs Northern Region CDCR; Internal Affairs Southern Region CDCR; Internal Affairs Central Region CDCR and PREA Ombudsmen Office of Inspectors General.

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

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

§115.52	Exhaustion of administrative remedies
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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 review of 5.1.2. A. III. K. 2 (a-d); GSMCCF 6. H. 03 V N & O; PREA Investigation report; Staff Compliant Response; Confidential Supplement to Appeal I find they meet this standard.

Golden State MCCF has not received any emergency grievances filed.

Golden State MCCF does not impose a time limit on when an offender may submit a grievance regarding an allegation of sexual abuse.

Golden State MCCF does not require an offender to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.



Golden State MCCF ensures that an offender 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.

Golden State MCCF 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 offenders, staff members, family members, attorneys, and outside advocates, are permitted to assist offenders in filing requests for administrative remedies relating to allegations of sexual abuse, and are also be permitted to file such requests on behalf of offenders.

Golden State MCCF has established procedures for the filing of an emergency grievance when the offender is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, Golden State MCCF 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 Golden State MCCF' determination whether the offender is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Golden State MCCF may discipline an offender for filing a grievance related to alleged sexual abuse only where Golden State MCCF demonstrates that the offender filed the grievance in bad faith.

Based on review of grievance filed I find the facility meets this standard.

§115.53	Offender access to outside confidential support services
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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 review of policy 5.1.2. A. III. L -8 (a-b); GSMCCF 6. H. 03 V. U.; Offender Orientation Handbook; Offender Pamphlet Sexual Assault Awareness; poster and interview with random offenders I find they meet this standard.

CDCR is working on an MOU with a outside victim advocates for emotional support services related to sexual abuse but has been unsuccessful so far. Golden State MCCF offenders will be notified of R.A.I.N. Rape, Abuse, and Incest National Network during Orientation. This information is also in the Offender Handbook and PREA Awareness pamphlet. R.A.I.N. does not provide victim advocate services but does provide reporting mechanisms and counseling services. If an inmate is a victim of sexual assault Golden State will transfer the victim to the HUB which is North Kern

State Prison. Just Detention International is working on an MOU with Alliance Against Family Violence who will provide victim advocacy services to the victim. The California Department of Corrections Captain interviewed ensured that this process was in place and that the Alliance Against Family Violence has verbally agreed to provide these services pending final signatures.

If an Offender requires Mental Health services they are transferred to North Kern State Prison.

§115.54 Third party reporting

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 review of policy 5.1.2. A. III K-3; GSMCCF 6. H. 03 V. P; PREA Posters I find they meet this standard.

The GEO Group has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of an offender. Visitors can go to [www.geogroup.com/reporting/Sexual\\_Abuse\\_PREA](http://www.geogroup.com/reporting/Sexual_Abuse_PREA).

§115.61 Staff and agency reporting duties

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)

Based on review of policy 5.1.2. A. III. K. 4 (a-c); GSMCCF 6. H. 03 V Q. and interviews with random staff; Facility Administrator and medical/mental health staff I find they meet this standard.

The GEO Group requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of The GEO Group; retaliation against offenders 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 does not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

If the alleged victim is considered a vulnerable adult under a California Penal Code 5-28-110 vulnerable persons statute, The GEO Group will report the allegation to the designated State or local services agency under applicable mandatory reporting laws. There have been no incidents in past 12 months involving a vulnerable adult.

Golden State MCCF reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Golden State MCCF's designated investigators.

§115.62 Agency protection duties

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 review of 5.1.2. A. III. L. 1; GSMCCF 6. H. 03 V R; and interviews with random staff, and Facility Administrator I find they meet this standard.

When the GEO Group learns that a detainee is subject to substantial risk of imminent sexual abuse it takes immediate action to protect the detainee. This was confirmed during one of the random offender interviews I conducted with an individual who was bi-sexual and was being threatened by other offenders in the dorm. This offender went to the pod officer and told him what was transpiring in the pod and the officer took immediate action and the offender was immediately removed and brought up to R&R. He was then taken to medical and was moved to another dorm.

§115.63 Reporting to other confinement facilities

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 review of 5.1.2. A. III. L 5 (a-c); GSMCCF 6. H. 03 V. R.5; and interview with agency head and Facility Administrator I find they meet this standard.

Golden State MCCF has received an allegation from an offender regarding a sexual assault while at another facility. Review of report confirmed adherence to this standard.

Upon receiving an allegation that an offender was sexually abused while confined at another facility, the head of Golden State MCCF that received the allegation notifies the head of the facility 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.

§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 review of 5.1.2. A. III L-2 (a-f); 5.1.2. E. III D 1-4; GSMCCF 6. H 03 pg. 20 #2 and interview with security staff who are first responders, random staff I find they exceed this standard.

No incident has occurred requiring 1<sup>st</sup> responder duties.

Upon learning of an allegation that an offender 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 notify security staff.

Based on all staff are issued a 1<sup>st</sup> Responder Card and showed me the card during the random staff interviews I find they exceed this 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 comments, including corrective actions needed if does not meet standard

Based on review of Coordinated Response Plan; PREA Incident Checklist for Incidents of Sexual Abuse & Harassment and interview with Facility Administrator I find they meet this standard.

Golden State MCCF 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.

§115.66 Preservation of ability to protect offenders 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)
- Not applicable standard

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

Based on review of 5.1.2. A. III. A. 3 b and interview with agency head.

Golden State MCCF does not participate in collective bargaining.

§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 review of 5.1.2. A. III. M 2 (a-f); GSMCCF 6. H. 03 V. V. 2; Retaliation Log and interview with agency head, Facility Administrator, and designated staff member with monitoring retaliation I find they meet this standard.

The GEO Group has a policy to protect all offenders and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other offenders or staff, and designate which staff members or departments are charged with monitoring retaliation. Golden State MCCF personnel will protect offenders and staff who report sexual abuse, sexual misconduct, or sexual harassment from retaliation. The Warden has identified the PREA Compliance Manager as the Retaliation Monitor.

The GEO Group has multiple protection measures, such as housing changes or transfers for offender victims or abusers, removal of alleged staff or offender abusers from contact with

victims, and emotional support services for offenders 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, Golden State MCCF monitors the conduct and treatment of offenders or staff who reported the sexual abuse and of offenders who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by offenders or staff, and are act promptly to remedy any such retaliation. There is periodic status checks performed. Items the GEO Group should monitor include any offender disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Golden State MCCF continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

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

§115.68	Post allegation protective custody
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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 review of policy 5.1.2. A. III L 6; GSMCCF 6. H. 03 V L & S and interview with Facility Administrator.

No offender has been placed in involuntary segregation during this audit period.

§115.71	Criminal and administrative agency investigation
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of 5.1.2. E; GSMCCF 6. H. 03A III. B; Monthly PREA incident Tracking Log; Administrative Investigative Reports and interview with investigative staff I find they meet this standard.

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

Where sexual abuse is alleged, The GEO Group uses investigators who have received special training in sexual abuse investigations.

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

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

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as offender or staff. No agency requires an offender 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 contain a thorough description of physical, testimonial, and documentary evidence, the reasoning behind credibility assessments, and investigative facts and findings, and attaches copies of all documentary evidence where feasible.

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

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

The departure of the alleged abuser or victim from the employment or control of Golden State MCCF or agency does not provide a basis for terminating an investigation.

§115.72	Evidentiary standard for administrative investigation
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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 review of policy 5.1.2. E. III B 2 (d); GSMCCF 6. H. 03A. b. 2.d.; and interview with investigative staff as well as review of investigative files I find they meet this standard.

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

§115.73	Reporting to offenders
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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 review of policy 5.1.2.E III F (a-c); GSMCCF 6. G. 02A. V. K; Offender Notification Letter and interview with Facility Administrator; investigative staff; I find they meet this standard.

Following an investigation into an offender's allegation that they suffered sexual abuse in an agency facility, The GEO Group informs the offender as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If The GEO Group did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the offender.

Following an offender's allegation that a staff member has committed sexual abuse against the offender, The GEO Group subsequently informs the offender (unless The GEO Group has determined that the allegation is unfounded) whenever the staff member is no longer posted within the offender's unit; the staff member is no longer employed at Golden State MCCF; The GEO Group learns that the staff member has been indicted on a charge related to sexual abuse within Golden State MCCF; or The GEO Group learns that the staff member has been convicted on a charge related to sexual abuse within Golden State MCCF.

Following an offender's allegation that they had been sexually abused by another offender, The GEO Group subsequently informs the alleged victim whenever The GEO Group learns that the alleged abuser has been indicted on a charge related to sexual abuse within Golden State MCCF; or The GEO Group learns that the alleged abuser has been convicted on a charge related to sexual abuse within Golden State MCCF.

All such notifications or attempted notifications are documented. Golden State MCCF obligation to report under this standard is terminated if the offender is released from The GEO Group's custody.

§115.76	Disciplinary sanctions for staff
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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 review of policy 5.1.2. E. III 3 G 1.(a,c,d); GEO Employee Handbook pg. 16; Administrative Leave with Disciplinary action I find they meet this standard.



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. Reviewed Administrative Leave paperwork and Disciplinary Action pending the outcome of the investigation.

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.

§115.77	Corrective action for contractors and volunteers
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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 review of policy 5.1.2. A. III G 3 (a); 5.1.2. E. III G 3 a-f; GSMCCF 6. H. 03 V. I. 3; and interview with Facility Administrator I find they meet this standard.

No Contractor/Volunteer has been involved in a PREA related incident.

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

Golden State MCCF takes appropriate remedial measures, and considers whether to prohibit further contact with offenders, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

§115.78	Disciplinary sanctions for offenders
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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 review of 5.1.2. E. IV. L 2 (a-f); GSMCCF 6.H.03A; Title 15 Inmate Discipline; Rule Violation Report for Sexual Misconduct and interview with medical/mental health staff I find they meet standard.

Golden State MCCF has had no substantiated claims of offender on offender sexual abuse.

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

Sanctions are commensurate with the nature and circumstances of the abuse committed, the offender's disciplinary history, and the sanctions imposed for comparable offenses by other offenders with similar histories. Golden State MCCF has had no disciplinary sanctions for offenders filing false claims.

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

Golden State MCCF offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse.

The GEO Group disciplines an offender 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 does not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

The GEO Group prohibits all sexual activity between offenders and may discipline offenders for such activity.

§115.81	Medical and Mental health screening; history of sexual abuse
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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 review of policy 5.1.2. A. III D 2 (a-d); GSMCCF 6. H. 03 V E; Medical 14 day follow-up; PREA Risk Assessment and interview with staff responsible for risk screening and medical/mental health staff I find they meet this standard.

Central Valley MCCF does not have mental health services at this facility any offender requiring mental health services would be transferred to North Kern State Prison for treatment.

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

If the screening indicates that an offender has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the offender is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. The inmate would be referred to medical by the intake staff and if the inmate stated they wanted mental health treatment, medical would make a referral to mental health and the inmate would be seen at North Kern State Prison.

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 offenders before reporting information about prior sexual victimization that did not occur in an institutional setting.

§115.82	Access to emergency medical and mental health services
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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 review of 5.1.2. A. III L 7 (a-b); GSMCCF 6. H. 03 V T. and interview with medical and mental health staff I find they meet this standard.

No offenders have required emergency medical/mental health services, however there are policies in place that address the following:

Offender 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 immediately notify the appropriate medical and mental health practitioners. There have been no incidents in the past 12 months requiring emergency medical care.

Offender 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.

§115.83 Ongoing medical and mental health care for sexual abuse victims

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 review of 5.1.2 A; GSMCCF 6. H. 03 V V. and interview with medical staff I find they meet this standard.

No inmate has been placed on a treatment plan related to sexual abuse.

Golden State MCCF offers medical and mental health evaluation and, as appropriate, treatment to all offenders who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. Mental Health evaluation is accomplished via referral to the medical HUB on all inmate abusers within 60 days of learning of such abuse.

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.

Golden State MCCF provides such victims with medical and mental health services consistent with the community level of care.

Offender victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as 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.

§115.86 Sexual abuse incident reviews

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 review of policy 5.1.2. A. III. M. 3 (a-c); GSMCCF 6. H. 03 V pg. 27 #3; Completed OPR Report; PREA After Action Review Reports and based on interview with Facility Administrator, PREA compliance manager; incident review team I find they meet this standard.

Golden State MCCF 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 Golden State MCCF; and they examine the area in Golden State MCCF 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.

§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 review of 5.1.2.A; GSMCCF 6. H. 03; PREA Incident Report Tracking Log; 2015 Annual GEO Report; CDCR PREA Database Facility Report I find they meet this standard.

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

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

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

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

Upon request, The GEO Group provides all such data from the previous calendar year to the Department of Justice no later than June 30.

## §115.88

## Data review for corrective action

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 review of policy 5.1.2. A. III. N 2.(a-d) 2015 GEO Annual Report and interview with PREA coordinator I find they meet this standard.

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

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

The GEO Groups' report is approved by The GEO Group head and made readily available to the public through its website [www.geogroup.com/reporting/prea](http://www.geogroup.com/reporting/prea).

## §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 review of policy 5.1.2. A. III N. 3 and review of annual report I find they meet this standard.

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

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

**AUDITOR CERTIFICATION:**

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

*Katherine Brown*

July 22, 2016

Auditor Signature

Date