

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of facility:		Lawton Correctional Facility	
Physical address:		8607 SE Flowermound Rd. Lawton, Oklahoma 73501	
Date report submitted:		May 17, 2015	
Auditor Information		Katherine Brown	
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Date of facility visit:		May 12-14, 2015	
Facility Information			
Facility mailing address:		SAA	
Telephone number:		580-351-2778	
Lawton Correctional Facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input checked="" type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
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Agency Information			
Name of agency:		GEO Group Inc.	
Governing authority or parent agency:			
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AUDIT FINDINGS

NARRATIVE:

The audit of Lawton Correctional Facility was conducted on May 12-14, 2015 by Katherine Brown, Certified PREA auditor. The areas toured were a total of nine housing units containing pods A-D. There are eight general population units and one 84 bed segregation unit. Plus I toured the kitchen, laundry, programs area, and work areas.

An entrance meeting was held with facility staff. The following people were in attendance: Warden H.A. Rios, AW Dean Caldwell; AW of Programs Rick Whitten; Brittany Holmstrom, Executive Assistant/PREA Compliance Manager; Ralph Ford Chief of Security; Nicole Ruggieri, PREA Officer; Shirley Stouffer, Health Services Administrator; Destiny Mazingo HR; Glen King Security; Mike Plume, Security; Larry Homes Security; Spencer Landas, Administration; Bob Brown, Property; Morgan Bishop Administration; Trina Black Classification; Ebony Stinson, Records; Cliff Barvard, Security; Jason Morales, Training; Amy Huff, Administration; Robert Harding, Security and Phebia Moreland GEO PREA Coordinator.

Following the entrance meeting I toured the Lawton Correctional Facility from 08:30 – 12:00 pm. On the tour with me was, Warden H.A. Rios, AW Dean Caldwell; AW of Programs Rick Whitten; Brittany Holmstrom, Executive Assistant/PREA Compliance Manager; Ralph Ford Chief of Security; Nicole Ruggieri, PREA Officer; Shirley Stouffer, Health Services Administrator and Phebia Moreland GEO PREA Coordinator.

I asked for an alpha listing of all offenders housed at Lawton Correctional Facility and randomly selected 82 offenders as well as any offenders who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impaired offenders, I did interview one limited English speaking offender using a staff interpreter. I also asked for any offender who was transgender/intersex. I interviewed 3 LGTBI offenders. I asked for a shift roster and randomly selected 22 staff to interview.

On day one of the audit I toured the facility and conducted the specialized interviews. Day two of the audit was offender interviews all day. Day three of the audit I completed offender interviews; reviewed the investigation files; personnel files and training records.

There were 100 sexual assault/harassment allegation cases, all relatively recent (within the past year) I reviewed 28 random investigations. My random sampling included 16 Offender on Offender; 8 Staff on Offender; 2 Contractor on Offender; one anonymous reporting and one hotline referral. Of those allegations, 9 were unfounded; 1 substantiated; 9 unsubstantiated; 8 still open; 1 occurred at another facility.

The majority of the allegations are coming from Housing unit 7, which is the only Protective Custody unit in the entire state of Oklahoma. The facility does not control who goes into this unit only the Oklahoma Department of Corrections can place an offender

in there or remove them from there. The facility believes the increase in allegations coming from this unit stems from the types of offenders they house which are sex offenders; gangs; offenders charged with gambling, extortion, informants and any other offender who can not get along in any of the Oklahoma Department of Corrections Prisons. The offenders at this facility specifically in this unit have formed a "PREA Posse" to report allegations to get offenders off the block that they don't want there or to retaliate against offenders who are gambling and not wanting to pay their debts. I interviewed 9 offenders from this housing unit and was told some of the offenders use PREA reporting as a game and actually go around the cell block laughing and saying to other offenders be careful or I'll put a "Star on you," meaning a call to the PREA hotline because you dial * and the number to call the hotline. While some of the allegations appear to be frivolous and without merit all allegations have to be investigated. During my interviews all of the offenders in this unit told me this is a real problem with false claims being made against offenders and staff and that something needs to be done about it. There is no easy answer to this as there is no way to tell what is true and what are false allegations.

This creates a monumental task for the staff they have. My recommendation would be to at least dedicate a full time PREA Compliance manager that could devote more time on the investigations. I also recommend further training for the investigators to ensure they are conducting a thorough investigation and gathering enough information to make an informed decision regarding the investigation finding. Training for the investigators was actually being conducted by the GEO PREA Coordinator on the last day of the audit and was addressing some of the issues I had already identified. I suggested they focus on gathering more interviews from other possible witnesses or review video cameras to ensure the alleged abuser was actually even seen going into the cell. Most of the allegations are allegedly occurring in the cells where there are no witness, however depending on the type of assault I suggest interviewing the offenders housed next to the cell to see if they heard or saw anything or interview other offenders in the housing unit. Also interview officers assigned to the unit on all shifts to see if they saw or heard anything that could help substantiate the allegation. Also given the types of offenders housed at this facility and the size of this facility having a dedicated highly trained investigator on staff that could oversee the investigations might help to enhance this process.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Lawton Correctional facility was constructed in July 1998 and houses Offenders for the Oklahoma Department of Corrections. It was designed by GEO architectural firm and it is the largest correctional facility in Oklahoma. The original construction provided an administration building, support building, and six separate housing units. Each unit one through six houses 300 each and housing unit 7 & 8 house 304 each. Each unit is divided into five pods; each pod has two levels. Each set of two housing units incorporates a gymnasium, classrooms, medical clinic and offices for unit management function making

each pair of building semiautonomous. The support building encompasses health services, segregation, mail, library, vocational tech, industries, food services programs, supply, laundry, and offender property and intake services.

In August 2006, an additional two housing units were developed to increase the capacity by 608 beds to a total population of 2526. These housing units have two floors with three pods each and incorporate a support building with a satellite dining room, health, dental and psychiatric services, programs and unit management functions. Housing unit seven in the new addition is designated as the protective custody unit for the Oklahoma Department of Corrections. Within Housing unit 7 is a protection from protection wing and segregation for protection wing. The new addition is completely fenced off from the main compound. Roofed and fence enclosed walkways with strategically placed control gates connect all buildings. There are a total of 15 buildings; the site encompasses 164 acres with 41 acre enclosed inside the perimeter.

The results indicate:

Number of standards exceeded: 6

Number of standards met: 35

Number of standards not met:

Number of standards not applicable: 2

**Standard
number
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§115.11 Zero Tolerance

- 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. B. 1 2; Lawton Correctional Facility LCF 030601; Review of organizational chart; Central Region Organizational chart and facility organizational chart. Based on interview with PREA Coordinator and PREA compliance manager.

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

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

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

**Standard
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§115.12 Contracting with other agencies for confinement of 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)
- X Not applicable

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

Based on policy 5.1.2.A. III. A. 5 (a-b). Lawton Correctional Facility does not contract for confinement of offenders.

**Standard
number
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§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.; LCF 030601 PREA VII. a,b, c, f & g. Review of staffing plan; unannounced rounds; annual assessment; shift rosters and camera location schematics. Based on interview with Warden; PREA Compliance Manager and PREA Coordinator.

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

In circumstances where the staffing plan was not complied with, Lawton Correctional Facility documented and justified all deviations from the plan. Lawton Correctional Facility has not had to deviate from the identified staffing plan.

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.

**Standard
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§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)
- X Not Applicable

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

Lawton Correctional Facility does not house youthful offenders.

**Standard
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§115.15 Limits to cross gender viewing and searches

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 policy 5.1.2. A. III. I. 1-8; LCF 030601 C. (1-5; 7,9). Review of Training Plan – power point; LMS Staff Training; Strip Search Log; Opposite Gender announcement.

Lawton 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. In the event a cross gender search is done Lawton Correctional Facility documents all cross-gender strip searches and cross-gender visual body cavity searches. Lawton Correctional Facility has not conducted cross gender strip searches.

Lawton Correctional Facility 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. Lawton Correctional Facility makes the announcement over the intercom as well as staff make an announcement when they enter. Even the offenders announces a female staff as was evident when I was on the tour, they announced my arrival on the unit. Above each door "Opposite Gender Announcement" is stenciled in red.

Lawton Correctional Facility 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. I interviewed one transgender offender who confirmed this standard.

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. No cross gender searches performed.

Based on the announcement over the intercom as well as staff making the announcement when they enter; the offenders announcing female on the floor and the stencil above

the door to each pod reminding staff of the announcement I find Lawton Correctional Facility exceeds in this standard.

**Standard
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§115.16 Offenders with Disabilities and Limited English speaking

- 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. 1 (a-c); LCF 030601 X. Review of list of interpreters; medical education poster; 2015 Training Curriculum; TDD machine. Based on random offender and staff interviews and interview with limited English speaking offenders.

The GEO Group 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.

The GEO Group 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.

**Standard
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§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); LCF 030601 PREA VI. Review of background check; PREA annual disclosure waiver; promotion Letter & PREA promotion disclosure waiver. Based on interview with Human Resource Director. Review of personnel files and checks of criminal records being performed and annual rechecks.

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

The GEO Group considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with offenders.

The GEO Group performs a criminal background records check before enlisting the services of any contractor who may have contact with offenders performs a records check annually on all current employees and contractors who may have contact with offenders. All background checks are performed in Accurate Background and NCIC.

Based on the fact that background checks are performed annually I find Lawton Correctional Facility exceeds in this standard.

**Standard
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§115.18 Upgrades to facilities and technology

- 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 – 3; LCF 030601 VIII. Review of Invoice for purchase of cameras; Proposed camera schematic. Based on interview of agency head and warden

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 expansions (that was open at the time of the audit, there is a new Protective Custody unit under construction) or modifications to existing facilities.

Lawton Correctional Facility installed 22 new cameras with additional DVR to cover identified blind spots in housing unit 1 & 2. Plus an additional 96 cameras are being installed throughout the compound to cover potential blind spots found by the PREA Incident Review Committee and the Work Place Violence Committee, based on review of videos of incidents that have occurred.

**Standard
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§115.21 evidence protocol and forensic medical exams

- 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. E. III. A 3 (b-d); LCF 030601 IX. 4. b. Review of MOU with Comanche County Memorial Hospital; Hospital Service Agreement between Southwestern Medical Center & Correctional Healthcare Companies. Based on interview with PREA compliance manager.

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

The GEO Group offers all victims of sexual abuse access to forensic medical examinations, at Comanche County Memorial Hospital, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. The Director of Nursing is also the Director of the SANE Center that covers all of Southwest Oklahoma.

The GEO Group makes available to the victim a victim advocate from a rape crisis center. Several attempts had been made to Cornerstone Counseling & Consulting, the MOU was finally signed on May 11, 2015.

To the extent The GEO Group itself is not responsible for investigating allegations of sexual abuse, The GEO Group requests that the investigating agency follow the requirements listed above. DOC-OIG or Lawton Police Department conduct all criminal investigations and keep the facility informed of the progress and outcome of the investigations.

**Standard
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§115.22 referrals of allegations for investigations

- 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. E. III. A-1 a. 5.1.2. A. III. A-2; LCF 030601 V. A 3-6; OP 040117 II. & III. Review of facility tracking log; documentation for referrals to Inspectors General Office. Based on interview with agency head and investigative staff.

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

The GEO Group has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The GEO Group publishes such policy on its website [geogroup.com/Reporting Sexual Abuse PREA](http://geogroup.com/Reporting_Sexual_Abuse_PREA) The GEO Group documents all such referrals.

If a separate entity is responsible for conducting criminal investigations, such publication describes the responsibilities of both The GEO Group and the investigating entity.

**Standard
number
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§115.31 Employee training

- 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. F. 1. (a-f); LCF 030601 pg. 15 B & C. Review of Training Curriculum; training rosters; and training acknowledgment form. Based on interview with random staff.

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 Lawton Correctional Facility. 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.

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

**Standard
number
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§115.32 Volunteer and contractors 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. G. 1 (a-e) & H. 1 (a-f); LCF 030601 pg. 16 D & E. Review of Volunteer/Contractor Training Curriculum; Volunteer and Contractor PREA acknowledgment. Based on interview with volunteer and contractors.

The GEO Group 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.

The GEO Group has documentation confirming that volunteers and contractors understand the training they have received.

Standard number here	§115.33 Offender education
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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. E. 2 (a-j); LCF 030601 pg. 20 A. Review of Offender Handbook; Offender Handbook acknowledgment form; Facility PREA Poster; Medical acknowledgment form; Comprehensive Education Lesson Plan. Based on 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. Offenders are given the Offender Handbook and the PREA pamphlet.

Each Friday, Lawton Correctional Facility provides a comprehensive education to offenders either in person and they show a PREA 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. PREA information is also available on the offenders TV on Channel 2, as was confirmed during offender interviews.

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.

Based on the Comprehensive Education being held weekly and the information available on the offenders TV I find they exceed in this standard.

Standard number here	§115.34 Specialized training: Investigators
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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. 3 a-c; LCF 030601 pg. 18 H. 3. Review of Investigator Training Curriculum; ODOC OIG Investigators; Staff Training rosters; List of PREA Investigators and Investigators Training Certificates. Based on interview with investigative staff.

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

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

Standard number here

§115.35 Specialized training: Medical and mental health care

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. F. 2 (a-d); LCF 030601 pg. 18 H. Review of Medical/Mental Health roster; General PREA training; Correct Care Solutions Specialized Training Curriculum; Training acknowledgment and Certificates of Completion.

The GEO Group 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. Correct Care Solutions (CCS) Medical and Mental Health staff receive training on line; from GEO and from Department of Corrections as well as through CCS.

The GEO Group 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.

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

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

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

Based on 5.1.2. A. III. D-1 (a-g); LCF 030601 XI. Review of Transfer list; Initial Screening Instrument; PREA Risk Assessment; 30 day follow-up; and PREA Vulnerability Reassessment questionnaire. Based on interview with random offenders and intake staff responsible for screening. Only limited staff have access to the risk screening form this information is restricted to command staff. All Risk Assessments are maintained in offender files and are kept locked.

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 within 2 hours of arrival at Lawton Correctional Facility, unless they come in after 5 at which time they are screened the following day.

Lawton Correctional Facility 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 Lawton Correctional Facility, Lawton Correctional Facility reassesses the offender's risk of victimization or abusiveness based upon any additional, relevant information received by Lawton Correctional Facility 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 Lawton Correctional Facility implements appropriate controls on the dissemination within Lawton Correctional Facility 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 the Unit Manager; Case Manager; Chief of Classification; Parole Authorities and Executive Assistant have access to the screening tool.

Standard number here §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 policy 5.1.2. A. III. D. 1 (c-d) 3 (a-c); LCF 030601 pg. 23 B.1. Review of current roster victim/predators; Risk Assessment & Re-Assessment; Risk Assessment & Re-Assessment on transgender. Based on interview with PREA compliance manager and staff responsible for risk screening.

The Lawton Correctional Facility 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.

The Lawton Correctional Facility makes individualized determinations about how to ensure the safety of each offender.

In deciding whether to assign a transgender or intersex offender to a facility for male offenders, and in making other housing and programming assignments, The Lawton Correctional Facility 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.

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. Review of transgender file confirmed this standard.

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

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

The GEO Group 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.

Standard number here	§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 5.1.2. A. III. J. 1 (a-f); LCF 030601 pg. 25 A,B & D. Based on interview with warden, staff who supervise segregated offenders.

Lawton Correctional Facility has not used protective custody as a way to separate offenders from likely abusers.

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.

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

Lawton Correctional Facility assigns such offenders to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. If involuntary segregated housing assignment is made Lawton Correctional Facility clearly documents the basis for Lawton Correctional Facility's concern for the offender'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
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§115.51 Offender 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); LCF 030601 pg. 12; pg.21; pg. 27. Review of Offender Handbook; Offender poster; Investigation Packet. Based on interviews with random staff and offenders.

The Lawton Correctional Facility 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 GEO Group 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.

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. www.geogroup/Reporting_Sexual_Abuse_PREA.

**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-d); OP 090124 Offender Grievance Process pg. 6 G.

Lawton Correctional Facility has not had an offender file a sexual abuse grievance.

The GEO Group does not impose a time limit on when an offender may submit a grievance regarding an allegation of sexual abuse.

The GEO Group 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.

The GEO Group 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.

The GEO Group 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 permitted to file such requests on behalf of offenders.

The GEO Group 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, The Lawton 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 Lawton Correctional Facility's determination whether the offender is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

The GEO Group may discipline an offender for filing a grievance related to alleged sexual abuse only where The GEO Group demonstrates that the offender filed the grievance in bad faith.

Standard number here

§115.53 Offender 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-b); LCF 030601 pg. 32 D; pg. 41 XXII. Review of RAINN (Rape, Abuse, Incest National Network) and MOU with Cornerstone Counseling & Consulting. Based on interview with random offenders and offenders who reported sexual assault.

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

Lawton Correctional Facility informs offenders, 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.

The GEO Group has entered into memoranda of understanding with Cornerstone Counseling & Consulting.

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; LCF 030601 pg. 27. Review of Offender Handbook; Poster for visitors. [www.geogroup.com/Reporting Sexual Abuse PREA](http://www.geogroup.com/Reporting_Sexual_Abuse_PREA).

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.

Staff report abuse to preareport@doc.state.ok.us

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); LCF 030601 pg. 11 (7,9) Pg. 12 C. Oklahoma state statute OKLA Stat tit 21. IIII. Based on interviews with random staff; warden and medical/mental health staff

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 do not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

If the alleged victim is considered a vulnerable adult under a State vulnerable person's statute, The GEO Group reports the allegation to the designated State or local services agency under applicable mandatory reporting laws. Lawton Correctional Facility has not had a PREA incident involving vulnerable persons which required mandatory reporting.

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

Standard number here	§115.62 Agency protection duties
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. L. 1; LCF 030601 pg. 23 B.1; pg. 26. Review of Transfer summary. Based on interviews with random staff, and warden as well as Review of incident reports.

When the Lawton Correctional Facility learns that an offender is subject to substantial risk of imminent sexual abuse it takes immediate action to protect the offender.

Standard number here	§115.63 Reporting to other confinement facilities
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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 5.1.2. A. III. L 5 (a-c). LCF 030601 pg. 31 XV. A. Review of letter of Notification with Corresponding investigation. Based on interview with agency head and warden.

Upon receiving an allegation that an offender was sexually abused while confined at another facility, the head of Lawton 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
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§115.64 Staff first responder duties

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 L-2 (a-f); 5.1.2. E. III D 1-4; LCF 030601 pg. 28. Review of Serious Incident report and SANE/SAFE Order. Based on interview with security staff who are first responders, random staff and offenders who reported sexual abuse and review of Incident Reports

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 the 1st Responder Pocket Card I find Lawton Correctional Facility exceeds in this standard.

**Standard
number
here**

§115.65 Coordinated response

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, L3; LCF 030601 pg. 9 III. Review of Coordinated Response Plan and PREA incident checklist. Based on interview with warden

Lawton 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 Plan and PREA incident checklist identifying each element in the standard I find Lawton Correctional Facility exceeds in this standard.

Standard number here

§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)

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

Based on 5.1.2. A. III. A. 3 (b); 5.1.2. E. III. A 2 (a); LCF 030601 pg. 28 (2&3); Review of email regarding Staff/Offender Separation. Based on interview with agency head.

The Lawton Correctional Facility has not entered into any collective bargaining agreement that would limit the ability to remove alleged staff sexual abuses from the facility pending the outcome of the investigation or of a determination of whether and to what extent discipline is warranted.

Neither The GEO Group nor any other governmental entity responsible for collective bargaining on The GEO Group’s behalf entered into or renewed any collective bargaining agreement or other agreement that limits.

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 (a-f) LCF 030601 pg. 30 XIV C. Review of retaliation log. Based on interview with agency head, warden, designated staff member responsible for monitoring retaliation.

The Lawton Correctional Facility 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.

The Lawton Correctional Facility 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, The Lawton Correctional Facility 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 act promptly to remedy any such retaliation. There are periodic status checks performed. Items The Lawton Correctional Facility should monitor include any offender disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The Lawton Correctional Facility 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 Lawton Correctional Facility takes appropriate measures to protect that individual against retaliation.

Standard number here	§115.68 Post allegation protective custody
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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 L 6; LCF 030601 pg. 25 XII. A-D. Based on interview with warden. No offender has been placed in involuntary segregation.

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

Lawton Correctional Facility has not placed offenders who alleged to have suffered sexual abuse in involuntary segregation pursuant to reporting a PREA allegation.

**Standard
number
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§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. E. III B 1 (d) and (b) 2 (a-h); LCF 030601 pg. 11 (10) pg. 19 (3) pg. 32 B. Review of PREA Investigators list; Specialized Investigator Training Sign In Sheets; Investigative Packet PR 14-080; Certificates; Tracking log. Based on interview with investigative staff.

All allegations are reviewed by the Department of Corrections OIG office who reviews the case and decides if it will go criminal or if the facility will investigate it.

When Lawton 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, Lawton 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, Lawton Correctional Facility refers the case to the Department of Corrections OIG or Lawton Police Department.

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 include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

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

Substantiated allegations of conduct that appears to be criminal are referred for prosecution to Department of Corrections OIG or Lawton Police Department.

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 Lawton 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. E. III B 2 (d); LCF 030601. Based on interview with investigative staff. Review of investigation files.

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

**Standard
number
here**

§115.73 Reporting to 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 policy 5.1.2.E III F (a-c); LCF 030601 pg. 36 XVI. Review of Notification letters. Based on interview with warden; investigative staff

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 Lawton Correctional Facility 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, Lawton Correctional Facility 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 Lawton Correctional Facility; The GEO Group learns that the staff member has been indicted on a charge related to sexual abuse within Lawton Correctional Facility; or The GEO Group learns that the staff member has been convicted on a charge related to sexual abuse within Lawton Correctional Facility.

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

All such notifications or attempted notifications are documented.

An agency’s obligation to report under this standard is terminated if the offender is released from Lawton Correctional Facility’s custody.

Standard number here

§115.76 Disciplinary sanctions for staff

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. E. III 3 G 1.(a,c,d); LCF 030601 pg. 3 II. Employee Handbook pg. 16.

Lawton Correctional Facility has not had any substantiated cases against staff.

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

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

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

Standard number here	§115.77 Corrective action for contractors and volunteers
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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 3 (a); 5.1.2. E. III G 3 (a-f); LCF 030601 pg. 4 A; pg. 29 #6; pg. 35 3. C. Review of pending investigation with OIC. Based on interview with warden.

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

Lawton Correctional Facility 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.

**Standard
number
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§115.78 Disciplinary sanctions for 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)

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

Based on 5.1.2. E. III G 2 (a-f); LCF 030601 pg. 12, 20 #3; OP 060125 Acts Constituting Rule Violation. Review of Offender Misconduct Disciplinary Report. Based on interview with medical/mental health staff.

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.

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

Lawton Correctional Facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse. Lawton Correctional Facility provides individual psychotherapy; victim empathy; and how controls your own emotions.

Lawton Correctional Facility 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.

Lawton Correctional Facility prohibits all sexual activity between offenders and may discipline offenders for such activity.

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

- 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 D 2 (a-d); LCF 030601 pg. 22 &23. Based on interview with staff responsible for risk screening and medical/mental health staff. Review of Victim Aggressor Screening Tool; Mental Health Referral; PREA Risk Assessment.

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 or mental health 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.

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.

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 (a-b); LCF 030601 pg. 12, 29, 39 & 40. Review of Coordinated Response Plan; Serious Incident Report; SANE/SAFE order. Based on interview with medical and mental health staff and offenders who reported sexual abuse.

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.

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.

**Standard
number
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§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 (a-d); LCF 030601 pg. 40 XXI. Based on interview with medical/mental health staff and offenders who reported sexual assault.

Lawton Correctional Facility 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.

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.

Lawton Correctional Facility 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.

**Standard
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§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 (a-c); LCF 030601 pg. 38A. Based on interview with warden, PREA compliance manager; incident review team and Review of After Action Report and 30 day review. Excellent PREA after action review form that addresses all elements of the standard. Lawton Correctional Facility conducts an IRT for all cases Substantiated, Unsubstantial and Unfounded cases.

Lawton 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 Lawton Correctional Facility; and they examine the area in Lawton 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 After Action Report containing all elements of the standard I find Lawton Correctional Facility exceeds in this standard.

**Standard
number
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§115.87 Data collection

- 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. 1. (a-d), N. 3. (c) Review of Monthly PREA tracking log; serious Incident Report; PREA Incident Report Survey and BJS Census Survey.

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.

**Standard
number
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§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 policy 5.1.2. A. III. N 2.(a-d); LCF 030601 pg. 41 XXIII. Based on interview with PREA coordinator. Review of GEO Annual Report and ODOC Annual Report.

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

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

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

**Standard
number
here**

§115.89 Data storage, publication and destruction

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

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

Based on policy 5.1.2. A. III N. 3; LCF 030601 pg. 44. Review of GEO Annual Report and ODOC Annual Report.

The GEO Group makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website 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 _____

May 17, 2015 _____

Auditor Signature

Date