

PREA AUDIT: AUDITOR'S SUMMARY REPORT
ADULT PRISONS & JAILS



Name of facility:		Robert A. Deyton Detention Facility (RADDF)	
Physical address:		11866 Hastings Bridge Rd., Lovejoy, GA 30250	
Date report submitted:		June 14, 2014	
Auditor Information		Katherine Brown	
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Telephone number:		727-470-4123	
Date of facility visit:		June 4-6, 2014	
Facility Information			
Facility mailing address: <i>(if different)</i>			
Telephone number:			
Robert A. Deyton Detention 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 type="checkbox"/> Prison	
Name of PREA Compliance Manager:		Title:	Compliance Manager
Teresa Mims			
Email address: tmims@geogroup.com		Telephone number:	770-305-8124
Agency Information			
Name of agency:		GEO Group Inc.	
Governing authority or parent agency:			
Physical address:		One Park Place, Suite 700 621 NW 53 rd St Boca Raton, Florida 33487	
Mailing address:		Same as above	
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Agency Chief Executive Officer			
Name: George Zoley		Title:	Chairman of the Board, CEO and Founder
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Agency-Wide PREA Coordinator			
Name: Phebia Moreland		Title:	Director, Contract Compliance, PREA Coordinator
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AUDIT FINDINGS

NARRATIVE:

The audit of Robert A. Deyton Detention Facility was conducted on June 4-6, 2014 by Katherine Brown, Certified PREA auditor. The areas toured were a total of four pods, each pod containing 6 housing units totaling 24 housing units. There are 20 general population units, 2 female units and two administrative detention/segregation units, all units contain 32 beds per housing unit. I also toured the kitchen, laundry, programs area, and work areas.

An entrance meeting was held with facility staff. The following people were in attendance: Warden Ralph Cherry, Kenny Cauley Director of Operations, Eastern Region, PCM Teresa Mims, Assistant Warden Danny Horton and Chief Herbert Walker, Phebia Moreland, Director Contract Compliance PREA Coordinator.

Following the entrance meeting I toured the Robert A Deyton facility from 08:15 – 11:00 am. On the tour with me was, Warden Ralph Cherry, Kenny Cauley Director of Operations, Eastern Region, PCM Teresa Mims, Assistant Warden Danny Horton and Chief Herbert Walker, Phebia Moreland, Director Contract Compliance PREA Coordinator.

The night before the audit I asked for an alpha listing of all detainees housed at Robert A. Deyton Detention Facility and randomly selected one detainee from each housing unit as well as any detainees, there were no hearing/vision impairment detainees and no transgender/intersex detainees. On day one I reviewed all investigation files, there were 18 sexual assault/harassment allegation cases, all relatively recent (within the past year) 9 had been unfounded; 3 unsubstantiated and 6 referrals to appropriate facility where the incident occurred. I reviewed personnel files to confirm the back ground checks and five year rechecks; one volunteer file and one contractor file. All specialized staff interviews were completed.

On day two of the audit I interviewed 30 detainees; 2 LGTBI; 4 limited English speaking detainees and 20 random staff interviews. I conducted a telephone interview with a volunteer. I also contacted the Southern Crescent Sexual Assault Center to confirm the availability of victim advocate services and that they would report any allegations of sexual abuse. I reviewed training records to confirm staff have received the training as required by the standards.

Day three I reviewed the 3 After Action Reports and reviewed the PREA Risk Assessment screening forms and the storage area where these records are maintained.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Robert A. Deyton Detention Facility (RADDF) is a 164,465 square foot private detention facility located on a 22-acre site with a capacity of 768 detainees. It is located approximately 24 miles south of Atlanta, Georgia, off of US Highway 41/ 19 on Old Highway 3 in Lovejoy, Georgia.

The existing facility was built in 1984 with a capacity of 576 detainees and was previously used as a county jail. Robert A. Deyton Detention Facility had been condemned for approximately 3 years before renovation by GEO in late 2007. Once the renovation portion was completed, Robert A. Deyton Detention Facility received its

Notice to Proceed on February 20, 2008. The design-build team was then released to build the new 192 bed housing unit which opened January 2009.

The Robert A. Deyton Detention Facility, GEO provides secure care, custody and control for US Marshals prisoners. Services provided by GEO include security, medical care, food, laundry, booking, video arraignment and transportation. Both male and female prisoners are housed at this facility and include both pretrial prisoners and pre-designation felons awaiting transfer to the Federal Bureau of Prisons.

This is a very transient population with an influx in intakes and releases. During the 1st quarter of 2014 there were 1,604 new intakes and 1,325 were released prior to the 30 day reassessment; during the second quarter of 2014 there were 1,459 new intakes and 988 released prior to the 30 day reassessment.

RADDF is comprised of one building and a central core that includes all support functions and four (4) separate housing clusters connected to the support core by secure corridors. Administrative functions located on the first and second floors within the front entry of the building include: business support, Human Resources (HR), records retention, conference room, facility armory, mail room, detainee accounts, Information System services, training room, Senior Administrative staff offices, investigative services, transportation services, Classification and Program Support to include a Chaplain.

Housing units A, C and D consists of six (6) pods each, which includes a dayroom and 16 double bunked general population cells split on two levels. Each housing unit, including B unit, includes its own control room, detainee visiting area, out-door recreational space, showers and multi -purpose room. Housing unit B houses two pods of general population male units (B 1 & B2), two pods of general population female units (B3 & B4); all with a dayroom and 16 double bunked cells split on two levels. B unit also houses segregated detainees (B5 & B6) which includes a dayroom and 16 double bunked cells split on two levels; however, segregated detainees are often housed individually.

Robert A. Deyton Detention Facility maintains a secure environment, monitored by 190 cameras, that ensures the safety of the public provides a safe working climate for employees and offers humane and safe living conditions for detainees.

The mission of the statement reads as follows; The Robert A. Deyton Detention Facility (RADDF), established under contract, is a privatized detention facility offering cost effective, high quality service to the United States Marshals Service, Northern District of Georgia (USMS). RADDF ensures that the USMS receives comprehensive detention services through continual assessment and improvement of all areas of operations, which include the preservation of detainee rights through extensive security and safety measures, quality healthcare, balanced nutritional diets, productive activities, and fair and equitable treatment.

SUMMARY OF AUDIT FINDINGS:

On June 4-6, 2014, three site visits were completed at Robert A Deyton Facility in Lovejoy, Georgia. The results indicate:

Number of standards exceeded: 3

Number of standards met: 39

Number of standards not met: 0

Number of standards not applicable: 1

Standard number here 115.11 Zero Tolerance

- Exceeds Standard (substantially exceeds requirement of standard)
- 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; RADDf 11.12 A. 1 Based on interview with PREA Coordinator and PREA compliance manager, review of organizational chart.

Robert A. Deyton Detention Facility has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines the facility's approach to preventing, detecting, and responding to such conduct.

Robert A. Deyton Detention Facility employs 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.

Robert A. Deyton Detention Facility has a PREA Compliance Manager assigned directly to the facility.

Standard number here 115.12 Contracting with other agencies for confinement of detainees

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

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

Based on policy 5.1.2.A. III. A. 5 a-b; RADDf 11.12 Q 1&2 Based on interview with agency's contract compliance manager. The US Marshalls contract is not up for renewal however they have developed an addendum to the contract which includes their obligation to comply with the PREA standards.

Standard number here 115.13 Supervision and monitoring

- 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. C. 1. a-g; RADDf 11.12 C 1 – 4; RADDf 11.12 I. 1 Based on interview with Warden: PREA Compliance Manager and PREA Coordinator. Review of staffing plan, shift rosters, PREA annual facility assessment; documentation unannounced rounds log.

Robert A. Deyton Detention Facility has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect detainees against sexual abuse. When the staffing plan is not complied with the shift rosters reflect the reason for the deviation and what alternative coverage was provided.

The PREA Manager tracks all unannounced rounds in a database to show where rounds were conducted and when.

Robert A. Deyton Detention Facility completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed.

Staffing is one area that is addressed when the Incident Review Team conducts their after action report.

Standard number here 115.14 Youthful detainees

- 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. J. 2 a-c Youthful offenders are housed only in community confinement facilities.

Standard number here 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 policy 5.1.2. A. III. I. 1-8; RADDf 11.12 I. 2. (a-g) Review of limit to cross gender viewing & searches training; Defensive Tactics training on searches; training attendance records. None performed in the past year.

Robert A. Deyton Detention Facility does not conduct cross-gender strip searches or cross-gender visual body cavity searches.

Robert A. Deyton Detention Facility has policies and procedures that enable detainees to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. The policies and procedure require staff of the opposite gender to announce their presence when entering an detainee housing unit. While on the tour each time an officer of the opposite gender entered the housing unit an announcement was made as well as each time the auditor entered. During the interviews with staff and detainees they confirmed this practice was in place.

Robert A. Deyton Detention Facility does not search or physically examine a transgender or intersex detainee for the sole purpose of determining the detainee's genital status. If the detainee's genital status is unknown, it is determined during conversations with the detainee, by reviewing medical records, or, if necessary, the detainee is taken to medical for them to perform an exam.

Robert A. Deyton Detention Facility trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

**Standard
number here**

115.16 detainees with disabilities and limited English speaking

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. E. 1 a-c; RADDf 11.12 F. 1 (a-c); RADDf 11.1 A5. (a-d) Based on random detainee and staff interviews and Based on interview with limited English speaking detainees. Review of PREA Comprehensive Offender Education Lesson Plan in English & Spanish; Language line; PREA poster & TTY

Robert A. Deyton Detention Facility takes appropriate steps to ensure detainees with disabilities (including, for example, detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of Robert A. Deyton Detention Facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment,

Robert A. Deyton Detention Facility takes reasonable steps to ensure meaningful access to all aspects of Robert A. Deyton Detention Facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to detainees who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both

receptively and expressively, using any necessary specialized vocabulary. The interviews with the limited English speaking detainees confirmed they had received the appropriate training.

Robert A. Deyton Detention Facility does not rely on detainee interpreters, detainee readers, or other types of detainee assistants, if there is not a staff person on duty the language line is used to provide these services

Standard number here 115.17 Hiring and promotion decisions

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

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

Based on 5.1.2. A. III. C 2, a-d and H 4 a-c. RADD 11.12 B. 1 – 5 Based on interview with Human Resource Director review of personnel files. Review of Pre-Employment Interview; annual performance evaluation & new hire background screening form and contractor background investigation; internal applicant questionnaire.

Robert A. Deyton Detention Facility does not hire or promote anyone who may have contact with detainees, and does not enlist the services of any contractor who may have contact with detainees, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution, 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.

Robert A. Deyton Detention Facility considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with detainees.

Robert A. Deyton Detention Facility performs a criminal background records check before enlisting the services of any contractor who may have contact with detainees.

Robert A. Deyton Detention Facility conducts criminal background records checks at least every five years of current employees and contractors who may have contact with detainees or have in place a system for otherwise capturing such information for current employees. The HR Manager uses a spreadsheet to track the 5 year checks.

Standard number here 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 5.1.2. A. III. C – 3; RADDf 11.12 D Based on interview of agency head and warden. Review of CCTV equipment list. There are 190 cameras strategically located throughout Robert A. Deyton Detention Facility . There have been no substantial expansion or modification of facility.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Robert A. Deyton Detention Facility considers how such technology may enhance their ability to protect detainees from sexual abuse. Sixteen cameras have been budgeted to be installed in the dry storage area and the janitor’s closet in the units.

Standard number here 115.21 evidence protocol and forensic medical exams

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. E. III. A 3 b-d; RADDf E. a. Investigative Responsibility Based on interview with SANE/SAFE staff and PREA compliance manager. Reviewed MOU Southern Crescent Sexual Assault Center.

To the extent Robert A. Deyton Detention Facility is responsible for investigating allegations of sexual abuse, Robert A. Deyton Detention Facility follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions

Robert A. Deyton Detention Facility offers all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, 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.

Robert A. Deyton Detention Facility makes available to the victim a victim advocate from a rape crisis center. These services are performed by Southern Crescent Sexual Assault Center.

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

Any case that is deemed to be prosecutable is referred to the Lovejoy Police Department.

Standard number here 115.22 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 policy 5.1.2. E. III. A-1 a. 5.1.2. A. III. A-2; RADDf 11.12 P. 1. & E pg. 8 Investigative procedures. Based on interview with agency head and investigative staff.

Robert A. Deyton Detention Facility ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Robert A. Deyton Detention Facility has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. Robert A. Deyton Detention Facility publishes the policy on its website.

Robert A. Deyton Detention Facility has a policy that describes the responsibilities of both Robert A. Deyton Detention Facility and the Lovejoy Police Department.

Standard number here 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 policy 5.1.2. A. III. F. 1. a-f; RADDf 11.12 E. 1 – 5. Based on interview with random staff. Review of Training Acknowledgement Sheets, PREA Training curriculum; In Service Training sheets. Reviewed 5 random staff training files; three contractor training files and two volunteer training files.

Robert A. Deyton Detention Facility trains all employees who have contact with detainees 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) Detainees' right to be free from sexual abuse and sexual harassment;
- (4) The right of detainees 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 detainees;
- (9) How to communicate effectively and professionally with detainees, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming detainees; and

(10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. As of May 2014, 192 staff members have completed the annual PREA training and only 32 are left to complete the training by July 1, 2014.

Robert A. Deyton Detention Facility documents, through employee signature that employees understand the training they have received.

Standard number here 115.32 Volunteer and contractors 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. G. 1 a-e & H – 1 a-f; RADD E. Contractor/volunteers. Based on interview with volunteer and contractors. Reviewed Contractor 40 hrs. In Service Summary Record, PREA Training curriculum & power point; Volunteer Basic Training Acknowledgement.

Robert A. Deyton Detention Facility ensures all volunteers and contractors who have contact with detainees have been trained on their responsibilities under Robert A. Deyton Detention Facility's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

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

Robert A. Deyton Detention Facility has documentation confirming that volunteers and contractors understand the training they have received.

Standard number here 115.33 Detainee education

- 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. 2 a-j; RQADD 11.12 F. 2 a-g Based on interview with random detainees and intake staff. Reviewed Detainee Handbook English/Spanish; Detainee Pamphlets; Detainee Video Lesson Plan; Video Detainee Training Sign in Sheets.

During the intake process, detainees receive information explaining Robert A. Deyton Detention Facility's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

Within 30 days of intake, Robert A. Deyton Detention Facility provides a comprehensive education to detainees both in person and 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.

Robert A. Deyton Detention Facility provides detainee education in formats accessible to all detainees, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to detainees who have limited reading skills. There is documentation of detainee participation in these education sessions. The video is offered in English and Spanish as well as the Detainee Handbook is in both languages.

Standard number here 115.34 Specialized training: Investigators
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- Exceeds Standard (substantially exceeds requirement of standard)
- X. Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III F. 3 a-c; RADDf 11.12 E. Investigators Based on interview with investigative staff. Review of certificates of completion & Training; Training Sign in Sheets; Specialized Investigating Sexual Abuse Training Curriculum; GEO Training Certificates; GEO PREA Specialized Investigation Training Module.

In addition to the general training provided to all employees Robert A. Deyton Detention Facility ensures that the in house investigators have received training in conducting investigations in a confinement setting.

The Investigator interviewed confirmed that 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. Robert A. Deyton Detention Facility 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)
- 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. 2 a-d; RADDf 11.12 E. a & b Medical/Mental Health. RADDf staff do not conduct sexual assault forensic exams, Medical Staff roster, Medical PREA Training; Medical/Mental Health Specialized Training; SANE Certification; Specialized Training curriculum.

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

Robert A. Deyton Detention Facility maintains documentation that medical and mental health practitioners have received the training.

Medical and mental health care practitioners also receive the training mandated for employees under 115.31 or for contractors and volunteers under § 115.32

Standard number here	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 5.1.2. A. III. D-1 a-g; RADDf 11.12 G. 1. a - g Based on interview with random detainees and intake staff responsible for screening. Review of Risk Assessment & 30 day Re-assessment

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

Intake screening ordinarily take place within 72 hours of arrival at Robert A. Deyton Detention Facility .

The intake screening includes: whether the detainee has a mental, physical, or developmental disability; the age of the detainee; the physical build of the detainee; whether the detainee has previously been incarcerated; whether the detainee’s criminal history is exclusively nonviolent; whether the detainee has prior convictions for sex offenses against an adult or child; whether the detainee is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; whether the detainee has previously experienced sexual victimization and the detainee’s own perception of vulnerability.

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 Robert A. Deyton Detention Facility, in assessing detainees for risk of being sexually abusive.

Within 30 days from the detainee's arrival at Robert A. Deyton Detention Facility , Robert A. Deyton Detention Facility reassess the detainee's risk of victimization or abusiveness based upon any additional, relevant information received by Robert A. Deyton Detention Facility since the intake screening. The PREA manager tracks all assessments and reassessments using a spreadsheet that shows date of entry; 14 day projected evaluation due date; date of actual evaluation and release prior to 14 day evaluation. The 14 day appointment tracking log, which is done weekly shows the total evaluations/total predators/total victims/ classified high risk/ monthly total/total released and total remaining. The 30 day reassessment summary of calculations shows date of entry; 14 day projected evaluation due date; date of actual evaluation and release prior to 14 day evaluation. The percentage of completion appears low due to percentage of releases during the month. The auditor suggested they include in the spreadsheet the number of completed assessments compared to the number of detainees still remaining in confinement at the end of the 30 day period, to accurately reflect the correct percentages.

A detainee'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 detainee's risk of sexual victimization or abusiveness.

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

Risk screening records are maintained in the Records Room and only a limited number of executive staff have access to these files.

Standard number here 115.42 Use of screening information

- 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. 3 a-c ; RADD 11.12 G. 3.(c). Based on interview with PREA compliance manager and staff responsible for risk screening. Reviewed PREA Risk Assessment Log & Initial Assessment.

Robert A. Deyton Detention Facility uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those detainees at high risk of being sexually victimized from those at high risk of being sexually abusive.

Robert A. Deyton Detention Facility makes individualized determinations about how to ensure the safety of each detainee.

Robert A. Deyton Detention Facility considers on a case-by-case basis whether placement of a transgender/intersex detainee ensures the detainee's health and safety, and whether the placement would present management or security problems.

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

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

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

Robert A. Deyton Detention Facility does not place lesbian, gay, bisexual, transgender, or intersex detainees in dedicated units solely on the basis of such identification or status.

Standard number here 115.43 Protective custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. J. 1 a-f; RADDf 11.12 H. 3 – 8. Based on interview with warden, staff who supervise segregated detainees. Review of Corrective Action Plan for Deaf Mute; Supplement Report, Mental Health Tracking Log.

Detainees 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.

Detainees placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. Any programs that are restricted, appropriate documentation would be provided as to the duration and the reason for such restrictions.

Robert A. Deyton Detention Facility assigns such detainees 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 an involuntary segregated housing assignment is made Robert A. Deyton Detention Facility clearly documents the basis for the facility's concern for the detainee's safety; and the reason why no alternative means of separation can be arranged.

Every 30 days, Robert A. Deyton Detention Facility affords each such detainee a review to determine whether there is a continuing need for separation from the general population.

There have been no detainees placed in involuntary segregation.

Standard number here 115.51 Detainee 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 5.1.2. A. III K. 1 a-c; RADDf 11.12 K. 1 (a-c) Based on interviews with random staff and detainees. Review Handbooks English/Spanish. Agency reporting National Sexual Abuse Hotline 1-800-656-4673; OIG 1-800-869-4499 and Southern Crescent Assault Center 770-477-2177. www.reportlineweb.com/geogroup or 866-568-5425

Robert A. Deyton Detention Facility provides multiple internal ways for detainees to privately report sexual abuse and sexual harassment, retaliation by other detainees or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

Robert A. Deyton Detention Facility provides at least one way for detainees to report abuse or harassment to a public or private entity or office that is not part of Robert A. Deyton Detention Facility, and that is able to receive and immediately forward detainee reports of sexual abuse and sexual harassment to agency officials, allowing the detainee to remain anonymous upon request.

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

Robert A. Deyton Detention Facility provides a method for staff to privately report sexual abuse and sexual harassment of detainees on the GEO website.

Standard number here	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 5.1.2. A. III. K. 2 a-d; RADDf 11.12 K. 5 (a-c). There were no grievances in the past 12 months.

Robert A. Deyton Detention Facility does not impose a time limit on when an detainee may submit a grievance regarding an allegation of sexual abuse.

Robert A. Deyton Detention Facility does not require a detainee to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

Robert A. Deyton Detention Facility ensures that a detainee 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.

Robert A. Deyton Detention Facility issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

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

Robert A. Deyton Detention Facility has established procedures for the filing of an emergency grievance alleging that a detainee is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging a detainee is subject to a substantial risk of imminent sexual abuse, Robert A. Deyton Detention 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 Robert A. Deyton Detention Facility's determination whether the detainee is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Robert A. Deyton Detention Facility may discipline a detainee for filing a grievance related to alleged sexual abuse only when the facility demonstrates that the detainee filed the grievance in bad faith.

There have been no emergency grievances filed.

**Standard
number here**

115.53 Detainee 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; RADDf 11.12 M. 8 (a, b & d) Based on interview with random detainees and detainees who reported sexual assault. Review of MOU Southern Crescent Sexual Assault.

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

All the phone numbers to these organization are not recorded and this information is relayed to the detainees in the detainee handbook and on the posters in the housing units by the phones.

Robert A. Deyton Detention Facility maintains a memoranda of understanding with Southern Crescent Sexual Assault Center.

Standard number here 115.54 Third party reporting
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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 K-3p.; RADDf 11.12 J. 3.

Robert A. Deyton Detention Facility has a method to receive third-party reports of sexual abuse and sexual harassment and distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an detainee. Review of GEO website [http://geogroup.com/reporting Sexual Abuse PREA](http://geogroup.com/reporting_Sexual_Abuse_PREA)

Standard number here 115.61 Staff and agency reporting duties
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- Exceeds Standard (substantially exceeds requirement of standard)
- X. Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. K. 4 a-c; RADDf 11.12 J. 1. (a-b,e); Georgia Code 30-5.1 Protection of Disabled Adults & Elder persons. Based on interviews with random staff; warden and medical/mental health staff.

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

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

Standard number here 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 5.1.2. A. III. L. 1; RADD 11.12 M. 1 Based on interviews with random staff, and warden. Reviewed Serious Incident Report.

When Robert A. Deyton Detention Facility learns that a detainee is subject to a substantial risk of imminent sexual abuse, immediate action is taken to protect the detainee.

Standard number here 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 5.1.2. A. III. L 5 a-c; RADD 11.12 M. 5 (a-d) Based on interview with agency head and warden. Reviewed 6 Notification Cases where other agencies were notified of possible assault/harassment.

Upon receiving an allegation that a detainee was sexually abused while confined at another facility, the head of Robert A. Deyton Detention 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.

Robert A. Deyton Detention Facility documents that it has provided such notification. Six such notifications were reviewed.

Standard number here 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 1-3; RADDf 11.12 M. 3. (a-h) Based on interview with security staff who are first responders and random staff. Reviewed case #13-03-01. Based on Pocket card I find Robert A. Deyton Detention Facility exceeds in their ability to ensure staff respond to incidents correctly.

Upon learning of an allegation that a detainee was sexually abused, the first security staff member to respond to the report will: separate the alleged victim and abuser; preserves and protects any crime scene until appropriate steps can be taken to collect any evidence; 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.

Standard number here 115.65 Coordinated response

- 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 A-4. L3; RADDf 11.12 L. 1-3. Based on interview with warden. Review of emergency contact list; PREA Coordinated Response; PREA Emergency Response Checklist.

Robert A. Deyton Detention 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.

Standard number here 115.66 Preservation of ability to protect detainees from contact with abusers

- 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. A. 3 b; 5.1.2. E. III. A 2 a; RADDf 11.12 P. 4. Based on interview with agency head. RADDf currently has no collective bargaining agreements.

Standard number here 115.67 Agency protection against retaliation
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- Exceeds Standard (substantially exceeds requirement of standard)
- X. Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on 5.1.2. A. III. M 2 (a-f); RADDf 11.12 N. 2 (a-h). Based on interview with agency head, warden and designated staff member who monitors retaliation. Reviewed Case #13-09-04. There have been no incidents of retaliation.

Robert A. Deyton Detention Facility has a policy to protect all detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff, and designate which staff members or departments are charged with monitoring retaliation.

Robert A. Deyton Detention Facility has multiple protection measures, such as housing changes or transfers for detainee victims or abusers, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for detainees or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, Robert A. Deyton Detention Facility monitors the conduct and treatment of detainees or staff who reported the sexual abuse and of detainees who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by detainees or staff, and are act promptly to remedy any such retaliation. Items Robert A. Deyton Detention Facility monitors include any detainee disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Robert A. Deyton Detention 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, Robert A. Deyton Detention Facility are take appropriate measures to protect that individual against retaliation.

Standard number here 115.68 Post allegation protective custody

- 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; RADDf 11.12 H. 6 Based on interview with warden and detainees in segregation for risk of sexual victimization. In the past 12 months no one has been placed in segregation.

Standard number here 115.71 Criminal and administrative agency investigation

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

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

Based on policy 5.1.2. E. III b 1 d and b 2 a-h; RADDf 11.12 pg 8. Investigator; pg. 9 (h-l) RADDf 11.12 P.1 . Based on interview with investigator. Reviewed MOU between RADDf and Lovejoy Police Department. No investigations have gone criminal.

All investigations into allegations of sexual abuse and sexual harassment are performed promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

The agencies investigator has received special training in sexual abuse investigations pursuant to 115.34.

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.; RADDf 11.12 P. 2. Based on interview with investigative staff. There have been no substantiated allegations.

Robert A. Deyton Detention Facility imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

Standard number here 115.73 Reporting to detainees

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2.E III F a-c; RADDf 11.12 N. 3. & 4 (b-d); RADDf 11.12 E pg. 9 K Based on interview with warden and investigator. Reviewed incident 13-09-04; 13-09-05; 13-11-06; 13-11-07.

Following an investigation into an detainee’s allegation that he or she suffered sexual abuse in the facility, Robert A. Deyton Detention Facility informs the detainee as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If Robert A. Deyton Detention Facility did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the detainee.

Following a detainee’s allegation that a staff member has committed sexual abuse against the detainee, Robert A. Deyton Detention Facility subsequently informs the detainee (unless Robert A. Deyton Detention Facility has determined that the allegation is unfounded) whenever the staff member is no longer posted within the detainee’s unit; the staff member is no longer employed at the facility; the facility learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or the facility learns that the staff member has been convicted on a charge related to sexual abuse.

Following a detainee’s allegation that he or she has been sexually abused by another detainee, Robert A. Deyton Detention Facility subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or they learn that the alleged abuser has been convicted on a charge related to sexual abuse within Robert A. Deyton Detention Facility .

All such notifications or attempted notifications are documented.

An agency’s obligation to report under this standard is terminated if the detainee is released from Robert A. Deyton Detention 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; RADDf 11.12 O.1. (a-b). Reviewed Employee Handbook. There have been no terminations for PREA violations.

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

- 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 G 3 a; 5.1.2. E. III G 3 (a-f); RADD 11.12 O. 2. (a&b). Based on interview with warden. No volunteer/contractor engaged in sexual abuse/harassment of detainees.

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

Robert A. Deyton Detention Facility takes appropriate remedial measures, and would consider whether to prohibit further contact with detainees, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Standard number here 115.78 Disciplinary sanctions for detainees

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

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

Based on 5.1.2. E. III G 2 (a-f); RADD 11.12 O. 3. (a-f). Based on interview with medical/mental health staff. Reviewed disciplinary codes and sanctions. There have been no disciplinary charges as a result of sexual assault/harassment.

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

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

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

Robert A. Deyton Detention Facility does not offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse due to the transient population they serve.

Robert A. Deyton Detention Facility disciplines a detainee for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

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

Robert A. Deyton Detention Facility prohibits all sexual activity between detainees and may discipline detainees for such activity.

**Standard
number here**

115.81 Medical and Mental health screening; history of sexual abuse

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

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

Based on policy 5.1.2. A. III D 2 (a-d); RADD 11.12 G. 2. (a-c). Based on interview with staff responsible for risk screening and medical/mental health staff. Reviewed PREA Risk Assessment.

If the screening indicates that a detainee has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the detainee is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. There have been no situations where this has occurred.

If the screening indicates that a detainee has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure

that the detainee 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 detainees 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

- 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 ; RADD 11.12 M. 7. (a-b). Based on interview with medical and mental health staff and detainees who reported sexual abuse. Reviewed Serious Incident Report.

Detainee 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.

Medical staff are on duty 24/7 to respond to medical situations that may arise from a sexual assault.

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

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

Standard number here 115.83 ongoing medical and mental health care for sexual abuse victims
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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. . III M 1 a-d; RADDf 11.12 N. 1. (a-d). Based on interview with medical/mental health staff and detainees who reported sexual assault.

Robert A. Deyton Detention Facility offers medical and mental health evaluation and, as appropriate, treatment to all detainees who have been victimized by sexual abuse in any prison, jail, or lockup.

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.

Robert A. Deyton Detention Facility provides such victims with medical and mental health services consistent with the community level of care.

Detainee victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

Detainee 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 number here	115.86 Sexual abuse incident reviews
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- X. Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III. M 3 a.; RADDf 11.12 M. 3. (a-b). Based on interview with warden, PREA compliance manager; incident review team. Reviewed after action review report. I find they exceeds the standard due to the excellent PREA after action review form that addresses all elements of the standard.

Robert A. Deyton Detention 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 ordinarily 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 Robert A. Deyton Detention Facility; and they examine the area in Robert A. Deyton Detention 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.

Standard number here 115.87 Data collection
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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 N 1 d; RADDf 11.12 R. 1 (a-d). Reviewed PREA Incident Report Survey; Monthly PREA Incident Tracking Log.

Robert A. Deyton Detention Facility collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.

Robert A. Deyton Detention Facility aggregate the incident-based sexual abuse data at least annually.

The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

Robert A. Deyton Detention Facility maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Robert A. Deyton Detention Facility obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its detainees.

Upon request, Robert A. Deyton Detention Facility provides all such data from the previous calendar year to the Department of Justice no later than June 30 of each year.

Standard number here 115.88 Data review for corrective action
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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 N 2; RADDf 11.12 R. 2. (a-c) Based on interview with PREA coordinator. Reviewed http://geogroup.com/reporting_sexual_abuse_prea

Robert A. Deyton Detention Facility reviews data collected and aggregated in order 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 Robert A. Deyton Detention Facility as a whole.

Such report includes a comparison of the current year's data and corrective actions with those from prior years and are provide an assessment of Robert A. Deyton Detention Facility's progress in addressing sexual abuse.

Robert A. Deyton Detention Facility's report is approved by Robert A. Deyton Detention Facility head and made readily available to the public through the client's website.

Robert A. Deyton Detention Facility redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but must indicate the nature of the material redacted.

Standard number here 115.89 Data storage, publication and destruction
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on policy 5.1.2. A. III N. 3; RADDf 11.12 R. 3

Robert A. Deyton Detention Facility ensures that data collected pursuant to § 115.87 is securely retained.

Robert A. Deyton Detention Facility makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through the client's website.

Before making aggregated sexual abuse data publicly available, Robert A. Deyton Detention Facility removes all personal identifiers.

Robert A. Deyton Detention Facility maintains sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires.

AUDITOR CERTIFICATION:

The auditor certifies that the contents of the report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to her ability to conduct an audit of Robert A. Deyton Detention Facility under review.

Katherine Brown _____

_____ June 14, 2014 _____

Auditor Signature

Date