

## Prison Rape Elimination Act (PREA) Audit Report Community Confinement Facilities

Interim       Final

**Date of Report**    April 3, 2018

### Auditor Information

<b>Name:</b> Wynnie R. Testamark	<b>Email:</b> wynnie@bellsouth.net
<b>Company Name:</b> WTS Consulting Services, Inc.	
<b>Mailing Address:</b> P.O. Box 693081	<b>City, State, Zip:</b> Miami, FL 33169
<b>Telephone:</b> 786-258-4951	<b>Date of Facility Visit:</b> February 27 – 28, 2018

### Agency Information

<b>Name of Agency:</b> The GEO Group Inc.		<b>Governing Authority or Parent Agency (If Applicable):</b> N/A	
<b>Physical Address:</b> One Park Place, Suite 700		<b>City, State, Zip:</b> Boca Raton, FL 33487	
<b>Mailing Address:</b> 621 Northwest 53rd Street		<b>City, State, Zip:</b> Boca Raton, FL 33487	
<b>Telephone:</b> 561-893-0101		<b>Is Agency accredited by any organization?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>The Agency Is:</b>	<input type="checkbox"/> Military	<input checked="" type="checkbox"/> Private for Profit	<input type="checkbox"/> Private not for Profit
<input type="checkbox"/> Municipal	<input type="checkbox"/> County	<input type="checkbox"/> State	<input type="checkbox"/> Federal

**Agency mission:**    GEO’s Mission Statement is as follows: “GEO’s mission is to develop innovative public-private partnerships with government agencies around the globe that deliver high quality, cost-efficient correctional, detention, community reentry, and electronic monitoring services while providing industry leading rehabilitation and community reintegration programs to the men and women entrusted to GEO’s care”.

**Agency Website with PREA Information:**    [https://www.geogroup.com/PREA\\_Certification\\_Information](https://www.geogroup.com/PREA_Certification_Information)

### Agency Chief Executive Officer

<b>Name:</b> George C. Zoley	<b>Title:</b> Chairman of the Board, CEO and Founder
<b>Email:</b> gzoley@geogroup.com	<b>Telephone:</b> 561-893-0101

### Agency-Wide PREA Coordinator

<b>Name:</b> Phebia L. Moreland	<b>Title:</b> Director, Contract Compliance, PREA Coordinator
<b>Email:</b> pmoreland@geogroup.com	<b>Telephone:</b> 561-999-5827
<b>PREA Coordinator Reports to:</b> Daniel Ragsdale, Executive Vice President, Contract Compliance	<b>Number of Compliance Managers who report to the PREA Coordinator</b> 109

**Facility Information**

<b>Name of Facility:</b> Salt Lake City Center
<b>Physical Address:</b> 1585 West 2100 South, Salt Lake City, UT 84119
<b>Mailing Address (if different than above):</b> <a href="#">Click or tap here to enter text.</a>
<b>Telephone Number:</b> 801-973-3800 (ext. 77619)

<b>The Facility Is:</b>	<input type="checkbox"/> Military	<input checked="" type="checkbox"/> Private for Profit	<input type="checkbox"/> Private not for Profit
<input type="checkbox"/> Municipal	<input type="checkbox"/> County	<input type="checkbox"/> State	<input type="checkbox"/> Federal
<b>Facility Type:</b>	<input checked="" type="checkbox"/> Community treatment center	<input checked="" type="checkbox"/> Halfway house	<input type="checkbox"/> Restitution center
	<input type="checkbox"/> Mental health facility	<input type="checkbox"/> Alcohol or drug rehabilitation center	
	<input type="checkbox"/> Other community correctional facility		

**Facility Mission:** The Mission Statement of the Salt Lake City Center: “The mission of the Salt Lake City Center is to provide transitional services in a supervised environment in order to enhance public safety and assist offenders in becoming employed, law abiding citizens and to restore family and/or community ties in their respective communities”.

**Facility Website with PREA Information:** www.geogroup.com (Social Responsibility Section)

**Have there been any internal or external audits of and/or accreditations by any other organization?**  Yes  No

**Director**

<b>Name:</b> Leslie Flowers	<b>Title:</b> Facility Director
<b>Email:</b> lflowers@geogroup.com	<b>Telephone:</b> 801-973-3800 (ext. 77619)

**Facility PREA Compliance Manager**

<b>Name:</b> Leslie Flowers	<b>Title:</b> Facility Director
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Email: lflowers@geogroup.com		Telephone: 801-973-3800 (ext. 77619)	
<b>Facility Health Service Administrator</b>			
Name: N/A		Title: N/A	
Email: N/A		Telephone: N/A	
<b>Facility Characteristics</b>			
Designated Facility Capacity: 95		Current Population of Facility: 66	
Number of residents admitted to facility during the past 12 months			257
Number of residents admitted to facility during the past 12 months who were transferred from a different community confinement facility:			0
Number of residents admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more:			219
Number of residents admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more:			257
Number of residents on date of audit who were admitted to facility prior to August 20, 2012:			0
Age Range of Population:	<input checked="" type="checkbox"/> Adults 21 - 74	<input type="checkbox"/> Juveniles Click or tap here to enter text.	<input type="checkbox"/> Youthful residents Click or tap here to enter text.
Average length of stay or time under supervision:			6 months
Facility Security Level:			Minimum
Resident Custody Levels:			Minimum
Number of staff currently employed by the facility who may have contact with residents:			22
Number of staff hired by the facility during the past 12 months who may have contact with residents:			2
Number of contracts in the past 12 months for services with contractors who may have contact with residents:			0
<b>Physical Plant</b>			
Number of Buildings: 2		Number of Single Cell Housing Units: 0	
Number of Multiple Occupancy Cell Housing Units:		5	
Number of Open Bay/Dorm Housing Units:		0	
Description of any video or electronic monitoring technology (including any relevant information about where cameras are placed, where the control room is, retention of video, etc.): Salt Lake City Center has twenty(20) cameras strategically placed throughout the facility, which includes interior and exterior cameras; ultimately enhancing security and surveillance at the facility.			

<b>Medical</b>	
Type of Medical Facility:	University of Utah Medical Center (primary)
Forensic sexual assault medical exams are conducted at:	University of Utah Medical Center (SANE Provider) Rape Recovery Center (801-467-7273)
<b>Other</b>	
Number of volunteers and individual contractors, who may have contact with residents, currently authorized to enter the facility:	12
Number of investigators the agency currently employs to investigate allegations of sexual abuse:	111

# Audit Findings

## Audit Narrative

*The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-onsite audit, onsite audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.*

The PREA audit of The GEO Group, Salt Lake City Center, located at 1585 West 2100 South, Salt Lake City, Utah, was conducted on February 27 – 28 2018, by Wynnie R. Testamark, DOJ Certified PREA Auditor.

Approximately four weeks prior to the audit, agency wide and facility specific supplemental documentation was mailed to this auditor via U S Express Mail, which was received, on February 2, 2018. The documentation arrived in digital format (on a flash drive). The documentation consisted of agency policies, directives and facility specific procedures responding to policy, samples of supporting documentation to each standard and the completed Pre-Audit Questionnaire.

Prior to the audit, the facility was provided with a memorandum noting the scheduled date of the facility audit and tour, contact information to be posted throughout the facility for residents and staff to view. The facility onsite audit and tour was scheduled for, and conducted on, February 27 -28, 2018.

The PREA Resource Audit Instrument used for Community Confinement Facilities was provided by the National PREA Resource Center. There are seven sections: A) Pre-Audit Questionnaire; B) the Auditor Compliance Tool; C) Instructions for the PREA Audit Tour; D) the Interview Protocols; E) the Auditor's Summary Report; F) the Process Map; and G) the Checklist of Documentation.

The Auditor met via telephone with agency staff on Monday, February 26, 2018 and discussed the PREA audit process and what to be expected during the on-site portion of the audit.

On Tuesday, February 27, 2018, Jaime Jackson, GEO Program Performance Manager; transported the auditor to Salt Lake City Center. There, the auditor met with Facility Director Leslie Flowers, and her executive team for an entrance briefing. Shortly thereafter, we began with a tour of the facility.

A facility tour was conducted. Areas toured were, all housing dorms, intake, reception screening, central control, recreation, laundry, kitchen, resident dining, library, computer lab, dayroom, break room, program areas, outdoor recreation, upstairs classroom and storage. I

had the opportunity to observe the operations of the facility, and the interaction between staff and residents.

The tour began at 10:30 a.m. and concluded at 12noon. Accompanying on the tour was Facility Director, Assistant Director, Social Services Coordinator, Chief of Security, and Jamie Jackson, GEO Program Performance Manager.

The population of the facility on the first day of the audit was 66 (59 males/7females) residents in house and 21 on home detention.

Following the tour, the auditor began formal random interviews of residents and staff inclusive of specialized staff and residents present at the facility during the time of the audit. Interviews were conducted in areas of relative privacy. Everyone interviewed participated willingly and appeared to have a good understanding of the PREA standards and the agency's response and requirements regarding the standards, zero tolerance policy and reporting procedures.

All residents expressed a thorough understanding of their right to be free from sexual abuse, harassment, and retaliation. They also knew the appropriate channels in which to report allegations and they were aware of the medical and counseling services available to them.

The auditor reviewed the documentation provided by the facility prior to the facility visit. During the tour, the auditor randomly reviewed additional documentation throughout the facility in order to verify that the samples provided was consistent with facility practice. This included viewing postings, pamphlets, employee files, and training documentation for staff, volunteers and residents files.

The auditor observed signage posted in English, and Spanish, throughout the facility, explaining residents' rights to be free from sexual abuse and how to report allegations of sexual abuse and harassment. The agency's PREA Coordinator in collaboration with facility PREA Compliance Manager, and facility staff, ensuring the information is disseminated (in multiple languages) throughout the facility for everyone to have access.

Throughout the audit, the auditor interviewed a total of 22 staff members, and 13 residents; (10 males & 3 females).

Of the thirteen (13) residents interviewed, two (2) identified themselves as gay/lesbian, (0) Transgender residents, (0) Residents with cognitive disorders, (0) resident who report sexual abuse or harassment, (3) High risk of victimization resident and (0) residents who reported previous abuse or harassment during the intake screening, (0) Disabled residents; (0) Hard of hearing residents, and (1) Limited English Proficient residents.

Salt Lake City residential population is comprised of English and Spanish speaking residents. All residents interviewed, spoke and understood English and did not need the assistance of an interpreter. However; Salt Lake City Center has interpreter services if and when the need arises; pursuant to Limited English Proficiency (LEP).

Salt Lake City Center does not house youthful residents.

There was no resident who reported sexual abuse; who disclosed sexual victimization during risk screening; nor housed in segregation for risk of sexual victimization at Salt Lake City Center. As previously stated, all residents interviewed demonstrated knowledge of the agency's zero tolerance policy for sexual abuse, harassment and retaliation, and were able to identify how to report allegations of sexual abuse, harassment & retaliation.

Salt Lake City Center employs twenty-two (22) staff at the time of the audit. The auditor formally interviewed fourteen (14) random staff; comprised of all shifts. (1) Contractor Administrator (HR); (Salt Lake City Center does not employ Mental Health staff at the facility; however, residents do have access to Mental Health at University of Utah Medical Center & University of Utah Rape Recovery Center.

There were: Two (2) Staff who perform screening for risk of victimization and abusiveness; (2) Staff member on the incident review team; (1) staff member in charge with monitoring retaliation; (3) staff first responders, both security and non-security staff interviewed; (2) Intake staff member; Case Managers and the PREA Compliance Manager; (0) contractor staff.

In conclusion, a total of fourteen (14) staff from all shifts, and (13) residents' formal interviews was conducted. All interviews were conducted utilizing the approved PREA questionnaires from the National PREA Resource Center.

Currently, Salt Lake City Center utilizes fixed wing digital video recorders and DVR systems. The retention of the videos is 30 to 45 days. A Staff Monitor monitors all cameras in the Control Room.

Presently, Salt Lake City Center has twenty (20) cameras strategically placed throughout the facility, which includes interior and exterior cameras, ultimately enhancing security and surveillance at the facility.

Salt Lake City Center has not acquired any new facilities or made any expansions or modifications to the existing facility in the past 12 months.

Every area of the facility was observed as the standard requires and the auditor observed residents being supervised throughout the audit.

On February 28, 2018, the onsite visit concluded. The auditor conducted an exit briefing with Facility Director Leslie Flowers, her administrative staff, and Jamie Jackson; GEO Program Performance Manager, and provided a preliminary status of the audit findings.

During the report writing period the auditor reviewed additional policies, procedures and supplementary documentation that was received during the audit.

## Facility Characteristics

The Salt Lake City Center is a residential, community release program that contracts with the Federal Bureau of Prisons and the United States Probation Office to assist offenders as they reenter the community. SLCC has served residents for the Federal Bureau of Prisons since 1995.

The main building was acquired in 1995 and was originally a satellite nursing school. The entire program was housed in this building until the annex, which was formerly a printing company, was acquired in 2009. This building allowed for additional beds as well as administrative and program space.

The physical plant consists of two buildings located in a commercial area of Salt Lake City minutes from the downtown section. The main/reception building is a two story building located at 1585 West 2100 South.

Salt Lake City Center's program focuses on developing a broad base of community providers to connect residents with prior to leaving the Center. The objective is to help each resident develop skills necessary for returning to a less restrictive environment and connecting them with providers to support their return to the community. It provides transitional housing and services for residents referred by the United States Probation Office for supervision and prison wardens for institutional referrals. Residents, for the purpose of determining placement within a level system, are classified into one of three program components – community corrections, pre-release or home confinement.

The first floor houses the security/reception area, kitchen and dining area, dayroom, a women's dorm, three men's dormitories, a laundry area and bathroom and shower facilities. The second floor includes a dayroom/library, workout room, two large classrooms and separate storage areas for chemicals, bedding and archived records. An annex building located across the yard behind the main building houses a fourth men's dormitory with restrooms, laundry and dayroom, administrative offices, counselors' offices, staff lounge, lobby, conference room and storage

The facility is staffed twenty-four hours a day, seven days a week by security staff referred to as Security Monitors. The security office is in the front of the facility and is staffed around the clock. These staff members directly observe movement in and out of the facility. There is a contract with the county jail for food services. The facility does not have any medical or mental health staff. These services are available to all residents through contracts with local providers.

Contractual requirements require one female and one male staff to be on duty at all times.

Referrals to the Salt Lake City Center come almost exclusively from the Federal Bureau of Prisons. The major of referrals are pre- release transfers from BOP facilities and are serving the remainder of the sentence in the community.



The Salt Lake City Center also operates a home confinement component. Residents are eligible for home confinement after reaching their pre- release preparation date and having successfully completed all previous levels of the pre-release program. At the time of the audit, 21 residents were participating in the home confinement component.

GEO’s Mission Statement: “GEO’s mission is to develop innovative public-private partnerships with government agencies around the globe that deliver high quality, cost-efficient correctional, detention, community reentry, and electronic monitoring services while providing industry leading rehabilitation and community reintegration programs to the men and women entrusted to GEO’s care”.

The Salt Lake City Center’s Mission Statement: “The mission of the Salt Lake City Center is to provide transitional services in a supervised environment in order to enhance public safety and assist offenders in becoming employed, law abiding citizens and to restore family and/or community ties in their respective communities”.

## Summary of Audit Findings

*The summary should include the number of standards exceeded, number of standards met, and number of standards not met, **along with a list of each of the standards in each category**. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.*

**Auditor Note:** *No standard should be found to be “Not Applicable” or “NA”. A compliance determination must be made for each standard.*

**Number of Standards Exceeded: 4**

**Standard 115.213: Supervision and monitoring**

**Standard 115.231: Employee training**

**Standard 115.233: Inmate education**

**Standard 115.241: Screening for risk of victimization and abusiveness**

**Number of Standards Met: 36**

Click or tap here to enter text.

**Number of Standards Not Met: 0**

**Summary of Corrective Action (if any)**

**None**

During the onsite tour, there were some areas that were identified as blind spots in the housing dorms. A-Dorm North, A-Dorm North East, A-Dorm North West, A-Dorm West, and B-Dorm West. The auditor recommended the facility install security mirrors in the housing dorms to enhance security and visibility. The facility administrators were very receptive to recommendation made. On March 20, 2018, this auditor received an invoice and photographs from Jonathon Dressler, Director, Quality Assurance and Reentry Services, of the installed security mirrors in the dorms mentioned above.

While touring the facility, the telephone lines utilized to give residents access to outside confidential support services malfunctioned. On March 15, 2018, this auditor received an email confirmation memo that showed a service called was submitted (March 6), and a service technician from GTL (service provider) reprogrammed the phones to allow calls to the PREA Hotline and the phones are now operable.

## PREVENTION PLANNING

### Standard 115.211: Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

All Yes/No Questions Must Be Answered by The Auditor to Complete the Report

#### 115.211 (a)

- Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?  Yes  No
- Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?  Yes  No

#### 115.211 (b)

- Has the agency employed or designated an agency-wide PREA Coordinator?  Yes  No
- Is the PREA Coordinator position in the upper-level of the agency hierarchy?  Yes  No
- Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?  
 Yes  No

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2: Sexually Abusive Behavior Prevention and Intervention Program is a written plan mandating zero tolerance towards all forms of sexual abuse and sexual harassment and outlines the agency's approach to preventing, detecting and responding to such conduct. The policy includes definitions of prohibited behaviors and sanctions for those who violate these prohibited behaviors.

The agency 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 PREA Coordinator, through interview has indicated that she has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.

In addition, GEO Corporate policy #5.1.2-A, & Salt Lake City Center directive #2014-1 states the responsibilities of the PREA Coordinator and the PREA Compliance Manager. At facility level, the Assistant Director (PREA Compliance Manager) is responsible for the staff training and implementation of the facility's oversight of the PREA Standards.

An agency organizational chart and a facility organizational chart depict the positions and the span of control for both agency PREA Coordinator and facility PREA Compliance Manager.

Based on GEO Corporate policy#5.1.2: Sexually Abusive Behavior Prevention and Intervention Program, & Salt Lake City Center directive #2014-1: PREA Staffing and Facility Requirement, PREA Agency Organizational Chart, Salt Lake City Center Organizational Chart, and interviews with PREA Coordinator, Facility Director, and Assistant Director /PREA Compliance Manager, Salt Lake City Center meets the standard.

## Standard 115.212: Contracting with other entities for the confinement of residents

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.212 (a)

- If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)  Yes  No  NA

### 115.212 (b)

- Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.212(a)-1 is "NO".)  Yes  No  NA

### 115.212 (c)

- If the agency has entered into a contract with an entity that fails to comply with the PREA standards, did the agency do so only in emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)  Yes  No  NA

- In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)  Yes  No  NA

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA for Adult Prison and Jail and Adult Community Confinement Facilities) states GEO shall adhere to all contracts with other entities for the confinement of individuals that require its obligation to adapt and comply with the PREA standards.

It also states contractors in its facilities that have direct contact with individuals in GEO facilities or programs shall be obligated to comply with PREA standards.

GEO is a private provider and does not contract with other agencies for the confinement of residents; therefore this standard is not applicable.

## Standard 115.213: Supervision and monitoring

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.213 (a)

- Does the agency develop for each facility a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?  
 Yes  No
- Does the agency document for each facility a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?  
 Yes  No

- Does the agency ensure that each facility’s staffing plan takes into consideration the physical layout of each facility in calculating adequate staffing levels and determining the need for video monitoring?  Yes  No
- Does the agency ensure that each facility’s staffing plan takes into consideration the composition of the resident population in calculating adequate staffing levels and determining the need for video monitoring?  Yes  No
- Does the agency ensure that each facility’s staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring?  Yes  No
- Does the agency ensure that each facility’s staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring?  Yes  No

#### 115.213 (b)

- In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)  
 Yes  No  NA

#### 115.213 (c)

- In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the staffing plan established pursuant to paragraph (a) of this section?  Yes  No
- In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to prevailing staffing patterns?  Yes  No
- In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the facility’s deployment of video monitoring systems and other monitoring technologies?  Yes  No
- In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels?  Yes  No

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

## Instructions for Overall Compliance Determination Narrative

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior Prevention and Intervention, and Salt Lake City directive #2014-1: PREA Staffing and Facility Requirements, the agency 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 residents against sexual abuse.

A PREA Annual Facility Assessment is completed by Facility Director, Assistant Facility Director/PREA Compliance Manager, Chief of Security, and forwarded to the agency's PREA Coordinator and the Vice President, Residential Reentry Centers for review and approval.

The last PREA Annual Facility Assessment of Salt Lake City Center was completed on 06/15/17.

Currently, there're no vacancies at Salt Lake City Center. There were no deviations to the established staffing plan and no recommendations were made for any changes to the current staffing levels.

As an added layer of increased security, supervision and monitoring, the facility has in place a count verification procedure to monitor surveillance tapes on a weekly basis to ensure staff is conducting formal resident counts. These verifications are documented on a Resident Count Verification Checklist form.

To ensure accountability, management staff conducts and document unannounced PREA rounds within their respective areas to identify and deter employee sexual abuse and sexual harassment. Eventually, confirmation that surveillance tapes have been reviewed and results documented by management on the Resident Count Verification Checklist has to be reported directly to the Sr. Area Manager and the Vice President, Residential Reentry Centers on a weekly basis.

This practice was confirmed through staff, resident interviews and documentation provided.

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior Prevention and Intervention, and Salt Lake City directive #2014-1: PREA Staffing and Facility Requirement, Approved Staffing Plan, Facility PREA Annual Assessment, Resident Count Verification, Unannounced Rounds Log, Floor Plans, Statement of Fact Memo, Monitor Schedule, Camera Location Form, and interviews of residents and staff, Salt Lake City Center exceeds the standard.

## Standard 115.215: Limits to cross-gender viewing and searches

## All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.215 (a)

- Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?  
 Yes  No

### 115.215 (b)

- Does the facility always refrain from conducting cross-gender pat-down searches of female residents, except in exigent circumstances? (N/A if less than 50 residents)  
 Yes  No  NA
- Does the facility always refrain from restricting female residents' access to regularly available programming or other outside opportunities in order to comply with this provision? (N/A if less than 50 residents)  Yes  No  NA

### 115.215 (c)

- Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?  Yes  No
- Does the facility document all cross-gender pat-down searches of female residents?  
 Yes  No

### 115.215 (d)

- Does the facility implement policies and procedures that enable residents 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?  Yes  No
- Does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing?  Yes  No

### 115.215 (e)

- Does the facility always refrain from searching or physically examining transgender or intersex residents for the sole purpose of determining the resident's genital status?  Yes  No
- If a resident's genital status is unknown, does the facility determine genital status during conversations with the resident, 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?  
 Yes  No



## 115.215 (f)

- Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?  Yes  No
- Does the facility/agency train security staff in how to conduct searches of transgender and intersex residents in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior Prevention and Intervention, and Salt Lake City Center directive #2014-4, address resident pat searches, strip searches, body cavity searches and the limits to cross-gender viewing and searches. All staff receives training in pre-service and in annual in-service training on how to conduct searches, including searches of transgender and intersex residents.

Cross gender pat down searches, strip searches or visual body cavity searches is prohibited. A staff member of the same gender conduct pat searches and these searches are documented on a pat search log. Female residents interviewed reported that at no time have they been denied access to programs because a female staff member was not available to pat search them.

Residents are allowed to shower, perform bodily functions and change clothing without staff viewing their breasts, buttocks or genitalia. Staff of the opposite gender announces themselves when they enter the housing dorms. This practice was also observed during onsite.

Residents interviewed confirmed that this practice is being followed and denoted that they have privacy to toilet, shower and clothing change when staff of the opposite sex is in their housing unit.

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior Prevention and Intervention, Salt Lake City Center directive #2014-4, PREA Staff training curriculum, Staff rosters, Statement of fact, and interviews, Salt Lake City Center meets the standard.

## Standard 115.216: Residents with disabilities and residents who are limited English proficient

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.216 (a)

- Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?  Yes  No
- Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?  Yes  No
- Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?  Yes  No
- Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?  Yes  No
- Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?  Yes  No
- Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other? (if "other," please explain in overall determination notes.)  Yes  No
- Do such steps include, when necessary, ensuring effective communication with residents who are deaf or hard of hearing?  Yes  No
- Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?  Yes  No

- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?  Yes  No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?  Yes  No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Are blind or have low vision?  Yes  No

#### 115.216 (b)

- Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient?  Yes  No
- Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?  Yes  No

#### 115.216 (c)

- Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or the investigation of the resident's allegations?  Yes  No

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

Salt Lake City Center has in place the appropriate steps necessary to ensure residents with disabilities, and limited English proficiency have equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect and respond to sexual abuse and harassment.

GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior Prevention and Intervention and facility policy# 2014-2 states that the facility shall not rely on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties, or the investigation of the resident's allegations. Any use in those instances, staff must justify and document in the investigative report.

In addition, The PREA Education Manual for Residents, PREA Resident Reporting Options Poster, GEO PREA brochure: Sexual Assault Awareness, PREA Resident Video are all available in both English and Spanish and is also available in large print in both languages for residents with visual impairments. A Language Line Service for the translation of any other languages, and A TTY phone for hearing impaired residents is available also.

At the time of the audit there were no residents with hearing, visual or cognitive impairments, nor any limited English proficient residents. Salt Lake City Center does not utilize residents as interpreters, readers or other types of resident assistants.

In the past 12 months, there have no instances where resident interpreters were utilized.

Based on GEO Corporate policy#5.1.2-A: Sexually Abusive Behavior Prevention and Intervention, Salt Lake City Center directive#2014-2, PREA Education Manual for Residents (English, Spanish, & Large Print), Photo and observation of TDD phone (Hearing Impaired), PREA Resident Reporting Options Poster, Sexual Assault Awareness Facility Brochures, Language Line- Accessing Interpreters, and Statement of Facts, Salt Lake City Center meets the standard.

## Standard 115.217: Hiring and promotion decisions

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.217 (a)

- Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?  Yes  No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: 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?  Yes  No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above?  Yes  No

- Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?  
 Yes  No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: 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?  Yes  No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above?  Yes  No

#### 115.217 (b)

- Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents?  Yes  No

#### 115.217 (c)

- Before hiring new employees, who may have contact with residents, does the agency: Perform a criminal background records check?  Yes  No
- Before hiring new employees, who may have contact with residents, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?  Yes  No

#### 115.217 (d)

- Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?  Yes  No

#### 115.217 (e)

- Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?  Yes  No

#### 115.217 (f)

- Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?  Yes  No

- Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?  Yes  No
- Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?  Yes  No

#### 115.217 (g)

- Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?  Yes  No

#### 115.217 (h)

- Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)  Yes  No  NA

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

Review of GEO Corporate policy #5.1.2-A, Sexually Abusive Behavior Prevention and Intervention, Salt Lake City Center directive #2014-6, prohibits from hiring or promoting anyone who may have contact with residents who has engaged in, been convicted of, or been civilly or administratively adjudicated for engaging in sexual abuse in a confinement setting or the community.

Criminal background checks are conducted for all potential employees as well as BOP clearance for all staff both through NCIC and the Civilian Application System. Applicants who answer on their application that they have worked in a confinement setting previously, receive additional PREA verification/clearance.

The Salt Lake City Center does not have contractors or volunteers. When considering staff for promotions or for transfers, employees complete a PREA Disclosure and Authorization Form

Promotions – PREA Related Positions and another background check is completed. Additionally, at the time of annual performance evaluations, employees complete a PREA Disclosure and Authorization Form, Annual Performance Evaluation form. Background checks for all employees are completed every five years.

Currently, there are five vacancies: 3 monitors, 1 Case Manager, and 1 Employment Specialist at Salt Lake City Center. Random staff employee files were reviewed with the Office Support Specialist. Drivers' license checks are completed on all employees annually.

Based on agency policies #5.1.2-A, Sexually Abusive Behavior Prevention and Intervention, Salt Lake City Center directive #2014-6, New Hire Application, Pre-Background Check, Annual Performance Evaluation Disclosure, PREA Questionnaire Internal Promotional/Transfer, Statement of Facts and, interviews conducted, Salt Lake City Center meets the standard.

## Standard 115.218: Upgrades to facilities and technologies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.218 (a)

- If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)  
 Yes    No    NA

### 115.218 (b)

- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)  
 Yes    No    NA

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

## Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A, Sexually Abusive Behavior Prevention and Intervention and Salt Lake City Center directive #2014-1, requires that the facility takes into consideration the effect that any new design, acquisition, expansion or modifications of the physical plan or monitoring technology might have on the facility's ability to protect residents from sexual abuse.

Currently, Salt Lake City Center utilizes fixed wing digital video recorders and DVR systems. The retention of the videos is approximately 30-45 days. A Security Monitor monitors all cameras in the Control Room.

Salt Lake City Center has not acquired any new facilities or made any expansions or modifications to the existing facility in the past 12 months. However, since the last audit and Annual PREA Assessment dated June 2017, an upgraded camera system has been installed.

Presently, Salt Lake City Center has twenty (20) cameras strategically placed throughout the facility, which includes interior and exterior cameras; ultimately enhancing security, surveillance at the facility, and allowing supervisory staff to obtain evidence in the event of an allegation.

Based on GEO Corporate policy #5.1.2-A, Sexually Abusive Behavior Prevention and Intervention and Salt Lake City Center directive #2014-1, Facility PREA Annual Assessment (June 2017), staff rosters, staff training curriculum, SOF, staff interviews and, auditor observations, Salt Lake City Center meets the standard.

## RESPONSIVE PLANNING

### Standard 115.221: Evidence protocol and forensic medical examinations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.221 (a)

- If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)  
 Yes    No    NA

#### 115.221 (b)



- Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)  Yes  No  NA
- Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)  Yes  No  NA

#### 115.221 (c)

- Does the agency offer all residents who experience sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?  Yes  No
- Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?  Yes  No
- If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?  Yes  No
- Has the agency documented its efforts to provide SAFEs or SANEs?  Yes  No

#### 115.221 (d)

- Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?  Yes  No
- If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?  Yes  No
- Has the agency documented its efforts to secure services from rape crisis centers?  Yes  No

#### 115.221 (e)

- As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?  Yes  No
- As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?  Yes  No

#### 115.221 (f)

- If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)  Yes  No  NA

#### 115.221 (g)

- Auditor is not required to audit this provision.

#### 115.221 (h)

- If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (Check N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above.)  Yes  No  NA

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

According to GEO Corporate policy #5.1.2-E, Investigating Allegations of Sexually Abusive Behavior & Evidence Collection and facility policy #2014-6, the facility follows a uniform evidence protocol for the collection and preservation of evidence for administrative and criminal investigations of sexual abuse.

In the event of an incident, Salt Lake City Police Department will conduct all criminal investigations at the facility. All evidence will be collected and preserved according to evidence protocols established by the Department of Justice.

Forensic examinations are not performed at University of Utah Medical Center or Rape Recovery Center. Emergency health care as well as forensic examinations by SANE/SAFE staff is provided with no cost to the resident. An advocate is provided to the resident upon request to provide emotional support. Victims of sexual abuse are referred to the University of Utah Medical Center, Rape Recovery Center, or Safe Harbor Rape and Sexual Assault Services.

In the past 12 months, there have been no residents that required SANE exams.

The Salt Lake City Center has made an attempt to establish an MOU with Safe Harbor Rape and Sexual Assault Services, to provide victim advocacy services; their efforts are ongoing. At the current time, referrals for victim advocacy services are made to the University of Utah Medical Center, Rape Recovery Center, and Safe Harbor Rape and Sexual Assault Services.

Based on the GEO Corporate policy #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior & Evidence Collection, Salt Lake City Center directive #2014-6, MOU email attempt notifications, Safe Harbor Rape and Sexual Assault Services, and Statement of Fact, Salt Lake City Center meets the standard.

## Standard 115.222: Policies to ensure referrals of allegations for investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.222 (a)

- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?  Yes  No
- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?  Yes  No

### 115.222 (b)

- Does the agency have a policy and practice in place to ensure that 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?  Yes  No
- Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?  Yes  No
- Does the agency document all such referrals?  Yes  No

### 115.222 (c)

- If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? [N/A if the agency/facility is responsible for conducting criminal investigations. See 115.221(a).]  
 Yes  No  NA

### 115.222 (d)

- Auditor is not required to audit this provision.

#### 115.222 (e)

- Auditor is not required to audit this provision.

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

As stipulated in agency's policies #5.1.2-A Sexually Abusive Behavior & Intervention Program, #5.1.2-E Investigating Allegations of Sexually Abusive Behavior & Evidence Collection, Salt Lake City Center directive #2014-6, all allegations of staff sexual abuse are referred to the agency's Office of Professional Responsibility(OPR) and the Bureau of Prison (BOP).

All allegations of sexual abuse and sexual harassment by staff and residents are referred to the PREA Coordinator, Reentry Services PREA Divisional Coordinator and to BOP Residential Reentry Manager. The Salt Lake City Police Department is responsible for conducting criminal investigations for Salt Lake City Center.

The GEO Group, Salt Lake City Center Annual Report 2016 is made available to the public through the agency website: <http://www.geogroup.com> (Social Responsibility Section), which was reviewed by this auditor.

In the past 12 months, according to documentation reviewed, there have been zero allegation of sexual abuse and sexual harassment; zero allegation resulting in an administrative investigation; and zero allegation were referred for criminal investigation.

Based on agency policies #5.1.2-A Sexually Abusive Behavior & Intervention Program, #5.1.2-E Investigating Allegations of Sexually Abusive Behavior & Evidence Collection, Salt Lake City Center directive #2014-6, GEO Corporate Memo, BOP Email Memo, GEO website, and Statement of Facts, Salt Lake City Center meets the standard.

## TRAINING AND EDUCATION

## Standard 115.231: Employee training

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.231 (a)

- Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?  Yes  No
- Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?  Yes  No
- Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment  Yes  No
- Does the agency train all employees who may have contact with residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?  Yes  No
- Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in juvenile facilities?  Yes  No
- Does the agency train all employees who may have contact with residents on: The common reactions of juvenile victims of sexual abuse and sexual harassment?  Yes  No
- Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse?  Yes  No
- Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?  Yes  No
- Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?  Yes  No
- Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?  Yes  No

#### 115.231 (b)

- Is such training tailored to the gender of the residents at the employee's facility?  Yes  No
- Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?  Yes  No

### 115.231 (c)

- Have all current employees who may have contact with residents received such training?  
 Yes  No
- Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?  Yes  No
- In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?  Yes  No

### 115.231 (d)

- Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

The GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, addresses the agency's training requirements, and mandates all employees, volunteers, and contractors receive training on the agency's zero tolerance policy for sexual abuse and sexual harassment at pre-service and annually at in-service training.

Staff interviewed at Salt Lake City Center was very knowledgeable about the agency zero-tolerance policy for sexual abuse and sexual harassment; How to fulfill their responsibilities concerning prevention, detection, reporting, and response concerning sexual abuse and sexual harassment; The residents' rights to be free from sexual abuse and sexual harassment; Resident and employee's rights to be free from retaliation for reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and harassment in confinement; The common reaction of victims to sexual abuse and sexual harassment; How to detect signs of sexual abuse and sexual harassment; How to avoid inappropriate relationships with residents; How to communicate effectively and professionally with residents (LGBTI); and how to comply with relevant laws related to mandatory reporting.

The agency January 26, 2018 PREA training curriculum was reviewed and found to be very comprehensive and meets all the elements of 115.231(a) of this standard.

The Facility Assistant Director/PREA Compliance Manager provides the staff PREA training at Salt Lake City Center. Employees, who may have contact with residents, receive refresher training on PREA requirements every two years.

In the past 12 months, 22 employees at Salt Lake City Center, who may have contact with residents, were trained and or have had refresher training on the PREA requirements.

Random interviews with staff verified receiving this training and knew their responsibilities for preventing, detecting and responding to allegations of sexual abuse. Employees sign a PREA Basic Training Acknowledgement form stating that they have received and understood the training they received.

Based GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, PREA signed Acknowledgment form, GEO Corporate January 2018, PREA Training Curriculum, and random interviews with staff, Salt Lake City Center exceeds the standard.

## Standard 115.232: Volunteer and contractor training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.232 (a)

- Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?  Yes  No

### 115.232 (b)

- Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?  Yes  No

### 115.232 (c)

- Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?  Yes  No

### Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

The GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, addresses the agency's training requirements, and mandates all employees, volunteers, and contractors receive training on the agency's zero tolerance policy for sexual abuse and sexual harassment at pre-service and annually at in-service training.

All contractors and volunteers who have contact with residents at Salt Lake City Center receive PREA Orientation training prior to assuming their responsibilities. Orientation includes the GEO Corporate policy and procedures regarding sexual abuse and sexual harassment prevention, detection, reporting, and response including zero tolerance. Upon completion of orientation, the volunteer/contractor signs the Acknowledgment Form. Signed forms are maintained at the facility.

This auditor reviewed the agency January 26, 2018; PREA Volunteer/Contractor Training Curriculum.

There were twelve (12) volunteers, who have had contact with residents during this audit cycle, who have been trained in agency policies and procedures regarding sexual abuse/harassment prevention, detection, and response.

Based on GEO Corporate policy #5.1.2-A Sexually Abusive Behavior & Intervention Program, and January 2018, PREA Volunteer/Contractor Training Curriculum, Salt Lake City Center meets the standard.

## Standard 115.233: Resident education

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.233 (a)

- During intake, do residents receive information explaining: The agency's zero-tolerance policy regarding sexual abuse and sexual harassment?  Yes  No
- During intake, do residents receive information explaining: How to report incidents or suspicions of sexual abuse or sexual harassment?  Yes  No
- During intake, do residents receive information explaining: Their rights to be free from sexual abuse and sexual harassment?  Yes  No



- During intake, do residents receive information explaining: Their rights to be free from retaliation for reporting such incidents?  Yes  No
- During intake, do residents receive information regarding agency policies and procedures for responding to such incidents?  Yes  No

#### 115.233 (b)

- Does the agency provide refresher information whenever a resident is transferred to a different facility?  Yes  No

#### 115.233 (c)

- Does the agency provide resident education in formats accessible to all residents, including those who: Are limited English proficient?  Yes  No
- Does the agency provide resident education in formats accessible to all residents, including those who: Are deaf?  Yes  No
- Does the agency provide resident education in formats accessible to all residents, including those who: Are visually impaired?  Yes  No
- Does the agency provide resident education in formats accessible to all residents, including those who: Are otherwise disabled?  Yes  No
- Does the agency provide resident education in formats accessible to all residents, including those who: Have limited reading skills?  Yes  No

#### 115.233 (d)

- Does the agency maintain documentation of resident participation in these education sessions?  Yes  No

#### 115.233 (e)

- In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?  Yes  No

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

**Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Agency policies #5.1.2-A: Sexually Abusive Behavior & Intervention Program, #Salt Lake City Center #2014-2: Intake & Orientation mandates the facility provide PREA education to all residents beginning at inception into Salt Lake City Center. Within 24 hours of arrival, incoming residents are provided with educational information explaining the agency zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents of sexual abuse and sexual harassment. Residents also receive a PREA Education Manual for Residents and a GEO PREA Sexual Assault Awareness Program pamphlet, and GEO Reporting Options brochure by their assigned Case Manager.

In addition, all residents view a PREA video, which is shown during intake orientation by their Case Manager. Residents sign a Resident Video Acknowledgement form confirming receipt of the PREA Video and PREA Resident Education Manual. All information is provided in both English and Spanish. Resident education is documented for each resident and maintained in the resident files. During the onsite audit, this auditor reviewed twenty-five (25) resident files and found them to be consistent with GEO Corporate policy and practice.

Random residents interviewed acknowledged receiving the PREA training information and were knowledgeable of the agency's zero- tolerance policy, on how to report incidents of sexual abuse and sexual harassment. Also, all were aware of the contact information located throughout the facility and were provided PREA specific Literature/Video presentation during initial processing and upon arrival at Salt Lake City Center.

Based on the agency's policies #5.1.2-A: Sexually Abusive Behavior & Intervention Program, Salt Lake City Center #2014-2, PREA Resident Education Manual, PREA Resident Acknowledgment Receipt, Resident PREA Video, PREA Brochure, Posters, Sexual Assault Awareness Program Pamphlet, and GEO Corporate Reporting Options form, 25 resident files, and random resident interviews, Salt Lake City Center exceeds the standard.

## Standard 115.234: Specialized training: Investigations

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.234 (a)

- In addition to the general training provided to all employees pursuant to §115.231, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).]  Yes  No  NA

### 115.234 (b)

- Does this specialized training include: Techniques for interviewing sexual abuse victims? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).]  Yes  No  NA
- Does this specialized training include: Proper use of Miranda and Garrity warnings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).]  Yes  No  NA
- Does this specialized training include: Sexual abuse evidence collection in confinement settings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).]  Yes  No  NA
- Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).]  Yes  No  NA

### 115.234 (c)

- Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).]  Yes  No  NA

### 115.234 (d)

- Auditor is not required to audit this provision.

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, the facility's investigators receive specialized training in addition to the general education provided to all staff. This training meets the expectations of the standard and provides the recipient with the needed skills to conduct investigations in a confinement setting.

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 agency's PREA Coordinator provides a four-hour specialized training for investigators. At Salt Lake City Center, the Facility Director, and Facility Assistant Director are trained investigators, who completed training on October 2014 and August 2016.

The facility maintains documentation that the investigators have received required specialized training in conducting sexual abuse investigations.

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, Investigation Lesson Plan, Completion Certificates, and General PREA Training Records, Salt Lake City Center meets the standard.

## Standard 115.235: Specialized training: Medical and mental health care

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.235 (a)

- Does the agency ensure 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?  Yes  No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to preserve physical evidence of sexual abuse?  Yes  No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to victims of sexual abuse and sexual harassment?  Yes  No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment?  Yes  No

### 115.235 (b)

- If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.)  Yes  No  NA

### 115.235 (c)

- Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere?  Yes  No

**115.235 (d)**

- Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.231?  Yes  No
- Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? [N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.]  
 Yes  No  NA

**Auditor Overall Compliance Determination**

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

**Instructions for Overall Compliance Determination Narrative**

GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, outlines how the agency shall ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities is to be 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.

The Salt Lake City Center has no medical or mental staff on site. Off site providers are used for medical and mental services. Therefore; this standard is not applicable.

**SCREENING FOR RISK OF SEXUAL VICTIMIZATION  
AND ABUSIVENESS**

**Standard 115.241: Screening for risk of victimization and abusiveness**

**All Yes/No Questions Must Be Answered by the Auditor to Complete the Report**

#### 115.241 (a)

- Are all residents assessed during an intake screening for their risk of being sexually abused by other residents or sexually abusive toward other residents?  Yes  No
- Are all residents assessed upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents?  Yes  No

#### 115.241 (b)

- Do intake screenings ordinarily take place within 72 hours of arrival at the facility?  
 Yes  No

#### 115.241 (c)

- Are all PREA screening assessments conducted using an objective screening instrument?  
 Yes  No

#### 115.241 (d)

- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has a mental, physical, or developmental disability?  Yes  No
- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The age of the resident?  Yes  No
- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The physical build of the resident?  Yes  No
- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously been incarcerated?  
 Yes  No
- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident's criminal history is exclusively nonviolent?  
 Yes  No
- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has prior convictions for sex offenses against an adult or child?  Yes  No
- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the resident about his/her sexual orientation and gender identity AND makes a subjective determination based on

the screener's perception whether the resident is gender non-conforming or otherwise may be perceived to be LGBTI)?  Yes  No

- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously experienced sexual victimization?  Yes  No
- Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The resident's own perception of vulnerability?  Yes  No

#### 115.241 (e)

- In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?  Yes  No
- In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?  Yes  No
- In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?  Yes  No

#### 115.241 (f)

- Within a set time period not more than 30 days from the resident's arrival at the facility, does the facility reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?  Yes  No

#### 115.241 (g)

- Does the facility reassess a resident's risk level when warranted due to a: Referral?  Yes  No
- Does the facility reassess a resident's risk level when warranted due to a: Request?  Yes  No
- Does the facility reassess a resident's risk level when warranted due to a: Incident of sexual abuse?  Yes  No

- Does the facility reassess a resident's risk level when warranted due to a: Receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness?  
 Yes  No

#### 115.241 (h)

- Is it the case that residents are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?  Yes  No

#### 115.241 (i)

- Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?  Yes  No

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, and Salt Lake City Center #2014-3: Screening and Admission, the agency requires that residents be screened upon admission for risk of sexual abuse victimization or sexual abusiveness toward other residents.

PREA Risk Assessment form is used to screen residents upon admission and was found to contain all requirements of this standard. Policy also states, residents may not be disciplined for refusing to answer any questions or for not disclosing complete information. In addition to the screening form, a detailed review of any available records, which can assist in determining risk assessment, is required.

Within 30 days of arrival, a PREA Vulnerability Reassessment Questionnaire is completed to reassess the risk of victimization or abusiveness of all residents. Reassessments are completed, and referral requests are completed when incident of sexual abuse or receipt of additional information is received. The assigned Case Managers/Intake Coordinators are responsible for conducting the initial and 30-day reassessment screenings of residents.

Random interviews with residents confirmed that screening upon intake and reassessments



within 30 days of arrival are being completed. While interviewing two Case Managers, they articulated their responsibilities of the screening process.

Within the past 12 months, there were 257 residents at Salt Lake City Center (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility. Salt Lake City Center exceeds mandate of the standard. Residents are screened within 24 hours of their entry into the facility.

Within the past 12 months, there was 219 residents at Salt Lake City Center (whose length of stay in the facility was for 30 days or more) who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake. Residents in the program longer than 180 days, receives additional reassessment every 6 months.

During the onsite audit, this auditor reviewed twenty-five (25) resident files and found them to be consistent with GEO Corporate policy and practice.

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, Salt Lake City Center #2014-3: Screening/Admission, PREA Risk Assessment Form, PREA Vulnerability Reassessment Questionnaire, residents files, interviews with residents, and case managers, Salt Lake City Center exceeds the standard.

## Standard 115.242: Use of screening information

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.242 (a)

- Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?  Yes  No
- Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?  Yes  No
- Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?  Yes  No

- Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?  Yes  No
- Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?  Yes  No

#### 115.242 (b)

- Does the agency make individualized determinations about how to ensure the safety of each resident?  Yes  No

#### 115.242 (c)

- When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?  Yes  No
- When making housing or other program assignments for transgender or intersex residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?  Yes  No

#### 115.242 (d)

- Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?  Yes  No

#### 115.242 (e)

- Are transgender and intersex residents given the opportunity to shower separately from other residents?  Yes  No

#### 115.242 (f)

- Unless 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 lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents in dedicated facilities, units, or wings solely on the basis of such identification or status?  Yes  No
- Unless 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 lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing:

transgender residents in dedicated facilities, units, or wings solely on the basis of such identification or status?  Yes  No

- Unless 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 lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Guidelines on housing and program assignments and for the management of transgender and intersex residents are outlined in GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, and Salt Lake City Center #2014-3. The agency does not place LGBTI residents in housing units solely based on their sexual orientation.

The facility utilizes information from the risk assessment to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive. Transgender or intersex (TI) resident's housing is considered on a case-by-case basis, placement considers the inmate's health and safety, and whether the placement would present management or security problems; placement is reassessed as needed; TI resident's own view with respect to his or her own safety is given consideration; TI residents are given the opportunity to shower separately from other residents.

Salt Lake City Center does not house gay, bisexual, transgender or intersex residents in dedicated housing units.

Salt Lake City Center did not have any transgender or intersex residents at the time of the audit.

At the time of the audit, there were one (1) resident that identified as being gay, and one (1) resident that identified as being a lesbian at Salt Lake City Center. This Auditor interviewed both residents.

Based on policies #5.1.2-A: Sexually Abusive Behavior & Intervention Program, #2014-3,

PREA Risk Assessment Form, PREA Vulnerability Reassessment Questionnaire, Residential Referrals, At-Risk Log, interviews with residents, and Case Managers, Salt Lake City Center meets the standard.

## REPORTING

### Standard 115.251: Resident reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.251 (a)

- Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?  Yes  No
- Does the agency provide multiple internal ways for residents to privately report: Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?  Yes  No
- Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?  Yes  No

#### 115.251 (b)

- Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?  Yes  No
- Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?  Yes  No
- Does that private entity or office allow the resident to remain anonymous upon request?  Yes  No

#### 115.251 (c)

- Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?  Yes  No
- Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?  Yes  No

### 115.251 (d)

- Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Salt Lake City Center has procedures allowing for multiple internal and external ways for residents to report sexual abuse, sexual harassment, and retaliation. PREA reporting methods are shared with residents at intake, during orientation, in the PREA brochure, and on posters throughout the facility. GEO Corporate policy#5.1.2-A: Sexually Abusive Behavior & Intervention Program, Salt Lake City Center #2014-6, requires employees to report and document verbal reports immediately, and/or prior to the end of shift.

Specifically, residents are made aware that they can inform a staff member immediately, contact the Facility Director/PREA Compliance Manager, put their allegation in writing, or call one of many crisis hotline numbers/resources. Those numbers access the Corporate PREA Director, Rape Recovery Center Crisis Hotline (800-467-4273/7280), The RAINN National Hotline, (800-656-4673). Calling any of these numbers allows the residents to remain anonymous upon request.

Residents can also call the BOP Residential Reentry Management, to report an allegation of abuse. Information on Resident Reporting Options is posted throughout the facility at various locations in both English and Spanish. The PREA Educational Manual for Residents, received upon arrival, provides the residents with ways of reporting available to them. Residents are provided with addresses for reporting in writing and are informed that they can verbally report to any staff member.

All above-mentioned information is relayed to residents through various ways such as: PREA Residential Reporting Options (located in each resident dorm, lobby), and PREA Resident

Education Manual.

Staff has access to private reporting by calling the Employee Hotline at (866-568-5425) or the Corporate PREA Director at (561-999- 5827). The GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, #2014-6, and #2014-2 Intake & Orientation, and Employee Reporting Options posting mandates that staff accept all reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. Resident and staff interviewed were well versed in the methods of reporting available to them.

Random resident interviews confirmed residents knew the various ways in which they can report allegations and; random staff interviews confirmed staff was aware of the multiple ways in which residents and staff can report.

Information for resident and staff reporting is also available on the GEO's website and posted throughout the facility in various locations.

The RAINN National Hotline Network and The Rape Recovery Center Crisis Hotline were called during the audit on one of the residents' pay phone and found it to be accessible to residents.

Based on agency's policies #5.1.2-A: Sexually Abusive Behavior & Intervention Program, Salt Lake City #2014-6, and #2014-2 Intake & Orientation, and Employee Reporting Options, Employee Manual, PREA Residential Reporting Options, PREA Resident Education Manual, PREA resident Manual Acknowledgment forms, observations and interviews with staff and residents, Salt Lake City Center meets this standard.

## Standard 115.252: Exhaustion of administrative remedies

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.252 (a)

- Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.  Yes  No  NA

#### 115.252 (b)

- Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any

portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)  Yes  No  NA

- Does the agency always refrain from requiring a resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)  Yes  No  NA

#### 115.252 (c)

- Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)  Yes  No  NA
- Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)  Yes  No  NA

#### 115.252 (d)

- Does the agency issue 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? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)  Yes  No  NA
- If the agency determines that the 90-day timeframe is insufficient to make an appropriate decision and claims an extension of time [the maximum allowable extension of time to respond is 70 days per 115.252(d)(3)], does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)  Yes  No  NA
- At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)  Yes  No  NA

#### 115.252 (e)

- Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)  Yes  No  NA
- Are those third parties also permitted to file such requests on behalf of residents? (If a third-party files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in

the administrative remedy process.) (N/A if agency is exempt from this standard.)

Yes  No  NA

- If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)

Yes  No  NA

#### 115.252 (f)

- Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)  Yes  No  NA
- After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward 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 may be taken? (N/A if agency is exempt from this standard.)  Yes  No  NA
- After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)  Yes  No  NA
- After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)  Yes  No  NA
- Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)  Yes  No  NA
- Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)  Yes  No  NA
- Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)  Yes  No  NA

#### 115.252 (g)

- If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)  Yes  No  NA

#### Auditor Overall Compliance Determination



- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

The GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, and Salt Lake City Center directive #2014-5 outlines procedures for residents to submit grievances regarding sexual abuse and the agency has procedures for dealing with these grievances. Said information to file grievances is provided in the PREA Education Manual for Residents.

According to policy, there is no time limit on when a resident may submit a grievance regarding an allegation of sexual abuse. Third parties on behalf of a resident may also request administrative remedies relating to allegations of Sexual Abuse. Also, emergency grievances may be filed if the resident feels he/she is at substantial risk of imminent sexual abuse.

The Facility Director and Assistant Director/PREA Compliance Manager receives all copies of grievances related to sexual abuse and sexual harassment for monitoring purposes. In the past 12 months, there have been no grievances filed related to sexual abuse or sexual harassment.

Based on Salt Lake City Center PREA policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, #2014-5: Grievance Process, Statement of Fact, PREA Education Manual for Residents, interviews with Facility Director, Assistant Director, Chief of Security and documentation provided, Salt Lake City meets standard.

## Standard 115.253: Resident access to outside confidential support services

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.253 (a)

- Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?  Yes  No
- Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?  Yes  No

#### 115.253 (b)

- Does the facility inform residents, 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?  Yes  No

### 115.253 (c)

- Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?  Yes  No
- Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA), Salt Lake City Center Directive #2014-6, ensure residents are provided with access to outside victim advocates for emotional support without financial cost. Residents are given mailing addresses, telephone numbers, and the facility informs residents prior to giving them access of the extent to which such communications will be monitored.

Guidelines on how to access these agencies are provided to residents at intake by assigned Case Managers, and PREA Residents Education Manual, PREA Posters displayed in each resident's dorm, and throughout the facility.

Although facility administrators has made multiple attempts to secure MOU's from community agencies with no success; victims requesting advocacy services is referred to the RAINN National Hotline Network (1-800-656-(HOPE) 4673 – toll free), and the Rape Recovery Center Crisis Hotline (801-467-4273). Contacting any of the numbers allows the residents to remain anonymous upon request.

Residents interviewed were knowledgeable about the outside confidential support services available to them.

During this audit cycle, no victim's referral for offsite emergency medical or mental health services related to PREA.

While touring the facility, the telephone lines utilized to give residents access to outside confidential support services malfunctioned. On March 15, 2018, this auditor received an email confirmation memo that showed a service called was submitted (March 6), and a service technician from GTL (service provider) reprogrammed the phones to allow calls to the PREA Hotline and the phones are now operable.

Based on GEO Corporate policy #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA), Salt Lake City Center directive #2014-6, Access to Emergency Medical & Mental Health Services, PREA Residents Education Manual, PREA Posters, MOU email attempts and Statement of Fact, Salt Lake City Center meets the standard.

## Standard 115.254: Third-party reporting

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.254 (a)

- Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?  Yes  No
- Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

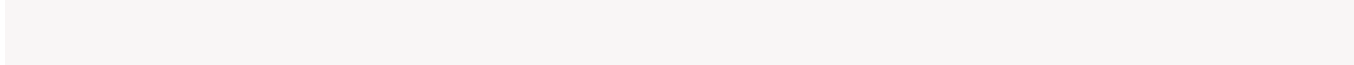
The GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, (Third Party Reporting) provides multiple methods to receive third-party reports of sexual abuse or sexual harassment.

Reviewed GEO Corporate website: [www.geogroup.com](http://www.geogroup.com) (Social Responsibility), to ensure compliance with 115.54(a) and verified that it contains information required stipulated in standard.

Additionally, the information on the web site encourages third parties to report allegations to the Facility Administrator, and GEO Corporate PREA Coordinator. Outside parties can report verbally or in writing to the facility management also.

Third Party reporting information is also included in the PREA Resident Education Manual, which is provided to each resident at intake. PREA Posters were observed throughout the facility and posted in each resident's dorm. All information stated above is provided in both English and Spanish.

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, GEO Corporate website, random staff and resident interviews, Salt Lake City Center meets this standard.



## OFFICIAL RESPONSE FOLLOWING A RESIDENT REPORT

### Standard 115.261: Staff and agency reporting duties

**All Yes/No Questions Must Be Answered by the Auditor to Complete the Report**

#### 115.261 (a)

- Does the agency require all staff to report immediately and according to GEO Corporate 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 agency?  Yes  No
- Does the agency require all staff to report immediately and according to GEO Corporate policy any knowledge, suspicion, or information regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?  Yes  No
- Does the agency require all staff to report immediately and according to GEO Corporate policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?  Yes  No

#### 115.261 (b)

- Apart from reporting to designated supervisors or officials, do staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in GEO Corporate policy, to make treatment, investigation, and other security and management decisions?  Yes  No

#### 115.261 (c)

- Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?  Yes  No

- Are medical and mental health practitioners required to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?  Yes  No

#### 115.261 (d)

- If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?  Yes  No

#### 115.261 (e)

- Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?  Yes  No

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, and Salt Lake City Center directive #2014-6, provide clear requirements to all staff regarding their obligation to report immediately any suspected or reported incidents involving sexual abuse and/or sexual harassment, regardless of whether the alleged incident took place at the resident current facility or not.

In addition, the policies also require all reports and information related to allegations remain confidential to the extent necessary for treatment, investigation and for other management decisions. Also, staff is required to immediately report all allegations of sexual abuse and/or harassment as well as the requirement to document the report in writing as soon as possible.

Interviews with random staff all confirmed compliance and all were able to articulate the reporting process and what is required of them when doing so.

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, and Salt Lake City Center directive #2014-6, Utah Survey of Vulnerable Persons Statutes, Statement of Fact, and random staff interviews, Salt Lake City Center meets the standard.

## Standard 115.262: Agency protection duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.262 (a)

- When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, addresses this standard and specifically states all staff shall take immediate action to protect residents at risk of imminent sexual abuse. This action includes immediate notification and coordination with Bureau Of Prisons.

Random interviews with staff confirmed when an inmate is subject to substantial risk, the resident will be relocated and assessed in order for staff to take the appropriate action. All staff members were aware of the requirement to immediately remove the prisoner from the area of the imminent threat.

In the past 12 months, Salt Lake City Center has had zero incidences where facility determined that a resident was a subject to a substantial risk of imminent sexual abuse.

Based GEO Corporate policy#5.1.2-A: Sexually Abusive Behavior & Intervention Program, Salt Lake City Center directive #2014-6, and interviews conducted with Facility Director, Assistant Director, Chief of Security, and staff; Salt Lake City Center meets the standard.

## Standard 115.263: Reporting to other confinement facilities

## All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.263 (a)

- Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?  Yes  No

### 115.263 (b)

- Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?  Yes  No

### 115.263 (c)

- Does the agency document that it has provided such notification?  Yes  No

### 115.263 (d)

- Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?  Yes  No

## Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

## Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, addresses upon receiving an allegation that a resident was the victim of sexual violence or staff sexual misconduct while confined at another facility, The Facility Director or Social Services Coordinator where the allegation was received shall notify the Facility Administrator of the institution or appropriate office of the agency where the alleged incident occurred within 72 hours after receiving the allegation.

In the past 12 months, Salt Lake City Center did not received any residents into the facility that has claimed or alleged he/she was sexually abused while confined at another facility.

In the past 12 months, Salt Lake City Center had no allegations of sexual abuse the facility received from other facilities.

Based on GEO Corporate policy#5.1.2-A: Sexually Abusive Behavior & Intervention Program, Salt Lake City Center directive#2014-6, and interviews with Facility Director, Assistant Director, Chief of Security, and random staff, Salt Lake City Center meets the standard.

## Standard 115.264: Staff first responder duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.264 (a)

- Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?  
 Yes  No
- Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?  Yes  No
- Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: 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, if the abuse occurred within a time period that still allows for the collection of physical evidence?  Yes  No
- Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: 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 abuse occurred within a time period that still allows for the collection of physical evidence?  Yes  No

### 115.264 (b)

- If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)



**Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, Salt Lake City Center directive#2014-6, provides information explaining the duties of staff that are first responders to allegations of sexual abuse or acts of sexual abuse. The policies require all staff to follow the protocol as dictated by this standard, including the separation of the alleged victim from the alleged abuser, preservation of evidence and the crime scene and to not allow the victim or abuser to take any action that would destroy physical evidence if the alleged incident took place within a time frame that would still allow for collection of that evidence.

In addition, Salt Lake City Center provides facility staff with a pocket reference to show compliance. The pocket reference is given to all staff as a quick reference guide for staff response to allegations of sexual violence against residents. The reference covers all steps to take during incidents of sexual abuse and if followed assures compliance.

In the past 12 months, Salt Lake City Center had no allegations of sexual abuse.

All staff interviewed during the tour, and during random interviews knew how to respond to and appropriately handle allegations of sexual assault as a first responder.

Based on GEO Corporate policy #5.1.2-A: Sexually Abusive Behavior & Intervention Program, Salt Lake City Center directive#2014-6, and random staff interviews, Salt Lake City Center meets the standard.

## Standard 115.265: Coordinated response

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.265 (a)

- Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Salt Lake City Center has developed a Facility Response Plan to utilize in conjunction with GEO Corporate policy#5.1.2-A: Sexually Abusive Behavior & Intervention Program, and PREA Process Coordinated Response.

The Response Plan details the required duties of every staff member involved in the handling of sexual abuse cases, from First Responders, Supervisory staff, Investigative staff Administrative staff, the list of Medical and Mental Health providers, and emergency response contact information.

Based on the above policy, the facility Response Plan Memo (January 31,2017), and interviews with staff, Salt Lake City Center meets the standard.

### Standard 115.266: Preservation of ability to protect residents from contact with abusers

#### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.266 (a)

- Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?  Yes  No

#### 115.266 (b)

- Auditor is not required to audit this provision.

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Statement of Fact states Salt Lake City Center does not have a collective bargaining unit. Additionally, the facility did not have any incidents where staff had to be separated from the resident during the past 12 months.

Based on GEO Corporate policy #5.1.2-A and Salt Lake City Center directive #2014-6 and interviews with Facility Director, Assistant Director, Chief of Security, and Case Managers, Salt Lake City Center meets the standard.

## Standard 115.267: Agency protection against retaliation

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.267 (a)

- Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?  Yes  No
- Has the agency designated which staff members or departments are charged with monitoring retaliation?  Yes  No

#### 115.267 (b)

- Does the agency employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?  Yes  No

#### 115.267 (c)

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct

and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?  Yes  No

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?  Yes  No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?  Yes  No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any resident disciplinary reports?  Yes  No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor resident housing changes?  Yes  No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor resident program changes?  Yes  No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?  Yes  No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff?  Yes  No
- Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?  Yes  No

#### 115.267 (d)

- In the case of residents, does such monitoring also include periodic status checks?  
 Yes  No

#### 115.267 (e)

- If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?  
 Yes  No

#### 115.267 (f)

- Auditor is not required to audit this provision.

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Agency's policies specifically states retaliatory measures against employees and residents who report incidents of sexual violence, staff sexual misconduct or sexual harassment as well as retaliatory measures against those who cooperate with investigations shall not be tolerated and shall result in disciplinary action and/or criminal prosecution.

GEO Corporate policy#5.1.2-A: Sexually Abusive Behavior & Intervention Program, and Salt Lake City Center directive# 2014-6 also requires staff to monitor, for a minimum of 90 days following a report, the treatment of residents and/or employees for treatment, which might suggest retaliation.

According to the policy, the Facility Human Resource Staff or Facility Investigator (Director or Assistant Director) shall monitor and; PREA Compliance Manager shall meet weekly with the victim to ensure victim is not exploited.

Salt Lake City Center did not have any incident of retaliation in the past 12 months.

Based on the above and interviews conducted with Facility Director, Assistant Director, and Chief of Security, Salt Lake City Center is meets the standard.

## INVESTIGATIONS

### Standard 115.271: Criminal and administrative agency investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.271 (a)

- When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a).]  Yes  No  NA
- Does the agency conduct such investigations for all allegations, including third party and anonymous reports? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a).]  Yes  No  NA

#### 115.271 (b)

- Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.234?  Yes  No

#### 115.271 (c)

- Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?  Yes  No
- Do investigators interview alleged victims, suspected perpetrators, and witnesses?  Yes  No
- Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?  Yes  No

#### 115.271 (d)

- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?  Yes  No

#### 115.271 (e)

- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?  Yes  No
- Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?  Yes  No

#### 115.271 (f)

- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?  Yes  No
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?  Yes  No

#### 115.271 (g)

- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?  Yes  No

#### 115.271 (h)

- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?  Yes  No

#### 115.271 (i)

- Does the agency retain all written reports referenced in 115.271(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?  Yes  No

#### 115.271 (j)

- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation?  Yes  No

#### 115.271 (k)

- Auditor is not required to audit this provision.

#### 115.271 (l)

- When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? [N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.221(a).]  Yes  No  NA

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

**Instructions for Overall Compliance Determination Narrative**

GEO Corporate policy #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior (PREA), addresses investigations of sexual abuse and sexual harassment. The policy dictates that Salt Lake City Center conduct investigations into allegations of sexual abuse and harassment immediately upon becoming aware of the allegation, regardless of how the report is received.

The policy also states, that the agency shall impose no standard higher than preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

In addition, Salt Lake City Center retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment.

During the past 12 months, Salt Lake City Center did not have any substantiated allegations of conduct that appeared to be criminal that were referred for prosecution.

Based on GEO Corporate policy #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior (PREA), reviewed PREA Incident Yearly Tracking Logs, and BOP written mandate (2/4/2015), interviews with Facility Director and Assistant Director / PREA Compliance Manager, Salt Lake City Center meets standard.

**Standard 115.272: Evidentiary standard for administrative investigations**

**All Yes/No Questions Must Be Answered by the Auditor to Complete the Report**

**115.272 (a)**

- Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?  Yes  No

**Auditor Overall Compliance Determination**



- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior (PREA), addresses investigations of sexual abuse and sexual harassment; clearly state the agency shall impose no standard higher than preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

During this review period, Salt Lake City Center has had zero (0) PREA related incidents.

Based on GEO Corporate policy #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior (PREA), and interviews with Facility Director and Assistant Director / PREA Compliance Manager, Salt Lake City Center meets the standard.

## Standard 115.273: Reporting to residents

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.273 (a)

- Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?  Yes  No

#### 115.273 (b)

- If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)  Yes  No  NA

#### 115.273 (c)

- Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?  Yes  No

- Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?  Yes  No
- Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?  Yes  No
- Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?  Yes  No

#### 115.273 (d)

- Following a resident’s allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?  
 Yes  No
- Following a resident’s allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?  
 Yes  No

#### 115.273 (e)

- Does the agency document all such notifications or attempted notifications?  Yes  No

#### 115.273 (f)

- Auditor is not required to audit this provision.

#### Auditor Overall Compliance Determination

**Exceeds Standard** (*Substantially exceeds requirement of standards*)

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

**Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior (PREA), addresses this specific standard by requiring written notification is provided to the victim to indicate the outcome of the investigation. The notification shall include information on the perpetrator and the status of that person as far as employment, placement and future prosecutions.

Policy also require, the Facility Director to inform the resident who was the alleged victim of sexual abuse in writing and forward written results promptly to the corporate PREA Coordinator for review.

Salt Lake City Center reported zero (0) allegations against staff that would have required the notifications in section (c). The facility reported no instances where the notification requirements in section (d) needed to be met.

Based upon review of GEO Corporate policy #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior (PREA), Salt Lake City Center directive #2014-6, Sample Notification of Outcome Allegation form, Statement of Fact memo, and interviews conducted, Salt Lake City Center meets standard.

## DISCIPLINE

### Standard 115.276: Disciplinary sanctions for staff

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.276 (a)

- Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?  Yes  No

### 115.276 (b)

- Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?  Yes  No

### 115.276 (c)

- Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) 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?  Yes  No

### 115.276 (d)

- Are 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, reported to: Law enforcement agencies unless the activity was clearly not criminal?  Yes  No
- Are 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, reported to: Relevant licensing bodies?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Agency guidelines #5.1.2-A: Investigating Allegations of Sexually Abusive Behavior (PREA) define termination as the presumptive sanction and that disciplinary history, circumstances of the act and sanctions of similar offenses will be considered. Staff who would have been terminated if not for their resignation will be reported to law enforcement agencies, unless the activity was not criminal, and to any applicable licensing bodies; as mentioned in #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior and Evidence Collection.

In the past 12 months, Salt Lake City Center did not have a staff member who was terminated and or resigned due to the violation of sexual abuse or harassment policy.

Based on agency policies #5.1.2-A: Investigating Allegations of Sexually Abusive Behavior (PREA), #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior and

Evidence Collection, review of Employee Handbook, Statement of Facts memo, and interviews with staff, Salt Lake City Center meets the standard.

## Standard 115.277: Corrective action for contractors and volunteers

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.277 (a)

- Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?  Yes  No
- Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies unless the activity was clearly not criminal?  Yes  No
- Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?  Yes  No

#### 115.277 (b)

- In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

Reviewed procedures prohibit contractors or volunteers who engaged in sexual abuse to have contact with residents and require they be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

There were no contractors, or volunteers in the facility, at the time of the audit.

Salt Lake City Center reported on the PAQ, there have been no instances of sexual abuse/harassment in the past twelve months involving contractors or volunteers being accused of PREA violations with residents.

Based on GEO Corporate policy#5.1.2-E: Investigating Allegations of Sexually Abusive Behavior, (PREA), and Statement of Facts memo, and Interview with Assistant Director/PREA Compliance Manager, Salt Lake City Center meets the standard.

## Standard 115.278: Interventions and disciplinary sanctions for residents

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.278 (a)

- Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?  Yes  No

### 115.278 (b)

- Are sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?  Yes  No

### 115.278 (c)

- When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?  Yes  No

### 115.278 (d)

- If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending resident to participate in such interventions as a condition of access to programming and other benefits?  Yes  No

### 115.278 (e)

- Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?  Yes  No

#### 115.278 (f)

- For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?  Yes  No

#### 115.278 (g)

- Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)  
 Yes  No  NA

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-E: Investigating Allegations of Sexually Abusive Behavior (PREA), and Salt Lake City Center directive #2014-6, outlines disciplinary sanctions that may be imposed on residents who engage in sexual abuse and sexual harassment.

Residents are subject to discipline internally for resident on resident sexual abuse. Residents are only disciplined for sexual relations with staff in cases where it is determined to be without consent from staff.

Sanctions are commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories. Furthermore, it shall be determined whether the resident's mental disabilities or mental illness contributed to the individuals' behavior.

The agency does not allow for consensual sexual relations.

In the past 12 months, there have been no administrative findings of resident on resident sexual abuse that have occurred at Salt Lake City Center.

In the past 12 months, there have been no criminal findings of guilt for resident on resident sexual abuse that occurred at Salt Lake City Center.

Based on GEO Corporate policy#5.1.2-E: Investigating Allegations of Sexually Abusive Behavior (PREA); Salt Lake City Center directive #2014-6, Resident Program Handbook: Prohibited Acts, and BOP Incident Reports with Informal Disciplinary Sanction forms, and interview with Assistant Director/PREA Compliance Manager, Salt Lake City Center meets the standard.

## MEDICAL AND MENTAL CARE

### Standard 115.282: Access to emergency medical and mental health services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.282 (a)

- Do resident 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?  
 Yes  No

#### 115.282 (b)

- If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.262?  Yes  No
- Do security staff first responders immediately notify the appropriate medical and mental health practitioners?  Yes  No

#### 115.282 (c)

- Are resident victims of sexual abuse 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?  Yes  No

#### 115.282 (d)



- Are treatment services 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?  
 Yes  No

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

GEO Corporate policy #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA), Salt Lake City Center directive #2014-6, require that residents who are victims of sexual abuse be afforded access to forensic medical examinations at an outside facility without financial cost where evidentiary or medically appropriate. Also, resident victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services.

Salt Lake City Center does not house mental health residents and they do not employ mental health practitioners at this facility. If it is determined that a mental health practitioner is needed, the resident will be transported to University of Utah Medical Center for treatment. These services are provided at no cost to the residents.

No forensic medical exams are conducted at Salt Lake City Center; but can provide emergency medical healthcare if needed. Forensic examinations by SANE/SAFE staff are provided at the outside hospital, University of Utah Medical Center, or Rape Recovery Center.

During this audit cycle, no victim's referral for offsite emergency medical or mental health services related to PREA.

Based on GEO Corporate policy #5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA), Salt Lake City Center directive #2014-6, Access to Emergency Medical & Mental Health Services, and Statement of Facts, Salt Lake City Center meets the standard.

### **Standard 115.283: Ongoing medical and mental health care for sexual abuse victims and abusers**

**All Yes/No Questions Must Be Answered by the Auditor to Complete the Report**

**115.283 (a)**

- Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?  Yes  No

**115.283 (b)**

- Does 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?  Yes  No

**115.283 (c)**

- Does the facility provide such victims with medical and mental health services consistent with the community level of care?  Yes  No

**115.283 (d)**

- Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)  Yes  No  NA

**115.283 (e)**

- If pregnancy results from the conduct described in paragraph § 115.283(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)  Yes  No  NA

**115.283 (f)**

- Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?  Yes  No

**115.283 (g)**

- Are treatment services 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?  Yes  No

**115.283 (h)**

- Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?  Yes  No

**Auditor Overall Compliance Determination**

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

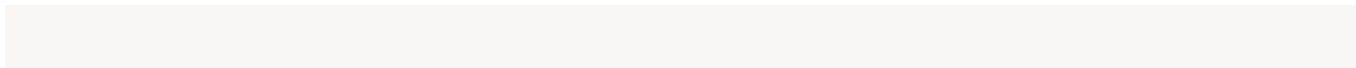
**Instructions for Overall Compliance Determination Narrative**

GEO Corporate policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), & Salt Lake City Center directive #2014-6 require residents receive timely unimpeded access to emergency medical treatment, and crisis intervention services without delay.

Female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results from sexual abuse, victims receive timely and comprehensive information about to all lawful pregnancy-related medical services. All victims are offered tests for sexually transmitted infections. Local providers provide these services off site.

Onsite visit interviews conducted with random staff and residents confirmed residents' access to outside confidential support services.

Based on GEO Corporate policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Salt Lake City Center directive #2014-6 Sexual Abusive Prevention, BOP Treatment Referral & Authorization, Planned Parenthood Utah MOU, Salt Lake City Center meets the standard.



**DATA COLLECTION AND REVIEW**

**Standard 115.286: Sexual abuse incident reviews**

**All Yes/No Questions Must Be Answered by the Auditor to Complete the Report**

**115.286 (a)**

- Does the facility conduct 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?  Yes  No

**115.286 (b)**

- Does such review ordinarily occur within 30 days of the conclusion of the investigation?  Yes  No

**115.286 (c)**

- Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?  Yes  No

**115.286 (d)**

- Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?  Yes  No
- Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?  Yes  No
- Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?  Yes  No
- Does the review team: Assess the adequacy of staffing levels in that area during different shifts?  Yes  No
- Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?  Yes  No
- Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.286(d)(1) - (d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?  Yes  No

**115.286 (e)**

- Does the facility implement the recommendations for improvement, or document its reasons for not doing so?  Yes  No

**Auditor Overall Compliance Determination**

**Exceeds Standard** (*Substantially exceeds requirement of standards*)

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

**Does Not Meet Standard** (*Requires Corrective Action*)

### **Instructions for Overall Compliance Determination Narrative**

The GEO Corporate policy# 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA) and Salt Lake City Center directive # 2014-6, is required to conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation in which the allegation has been determined to be substantiated or unsubstantiated. In addition, policy requires that a sexual abuse incident review must be conducted within 30 days of the conclusion of the investigation, unless the allegation is deemed to be unfounded.

The incident review team at Salt Lake City Center includes the Facility Director, Assistant Director/PREA Compliance Manager and the Chief of Security. PREA After Action Review Report is completed and forwarded to the agency PREA Coordinator. The PREA Compliance Manager maintains copies of all completed PREA After Action Review Reports and review forms in the corresponding investigative file.

Per the Facility Director Statement of Facts, in the past 12 months, there were no criminal and/or administrative investigations of alleged sexual abuse incidents that required an incident review.

Based on agency policies #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Salt Lake City Center directive# 2014-6, PREA Investigation Report, sample of PREA After Action Report, and Statement of Facts memo, Salt Lake City Center meets the standard.

## **Standard 115.287: Data collection**

### **All Yes/No Questions Must Be Answered by the Auditor to Complete the Report**

#### **115.287 (a)**

- Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?  Yes  No

#### 115.287 (b)

- Does the agency aggregate the incident-based sexual abuse data at least annually?  
 Yes  No

#### 115.287 (c)

- Does the incident-based data include, 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?  Yes  No

#### 115.287 (d)

- Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?  
 Yes  No

#### 115.287 (e)

- Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)  Yes  No  NA

#### 115.287 (f)

- Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)  
 Yes  No  NA

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

Salt Lake City Center collects data related to sexual abuse and this data is aggregated at least annually according to GEO Corporate policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and Salt Lake City Center directive # 2014-6. It is the responsibility PREA Compliance Manager to compile data collected on sexual activity, sexual harassment and sexual abuse incidents and forward this information to the PREA Coordinator on a monthly basis using the Monthly PREA Incident Tracking Log.

The agency provides data collected to the Department of Justice from the previous calendar

year upon request.

The latest Annual Report on Sexual Victimization 2016 report covering the period is available on the agency website at: [www.geogroup.com](http://www.geogroup.com) (Social Responsibility Section), was reviewed by this auditor.

Based on GEO Corporate policy# 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Salt Lake City Center directive# 2014-6, PREA Monthly Incident Tracking Logs, Yearly PREA Incident Tracking Log, GEO Group PREA Annual Data Report 2016, and DOJ Data Report, Salt Lake City Center meets the standard.

## Standard 115.288: Data review for corrective action

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

### 115.288 (a)

- Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?  Yes  No
- Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?  Yes  No
- Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?  Yes  No

### 115.288 (b)

- Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse  Yes  No

### 115.288 (c)

- Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?  Yes  No

### 115.288 (d)

- Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

According to GEO Corporate policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and Salt Lake City Center directive #2014-6, requires review of all data collected in order to assess and improve the effectiveness of its sexual abuse prevention and intervention program.

The PREA Coordinator prepares an annual report, which includes findings and corrective actions taken for each GEO facility. The annual report includes a comparison of the current year's data and corrective action with those from prior years.

The most current report (2016) is available on GEO's website: ([www.geogroup.com /Social Responsibility Section](http://www.geogroup.com /Social Responsibility Section)), was viewed by this auditor.

Based on agency's policies mentioned above, GEO PREA 2016 Annual Data Report, and GEO Group ([www.geogroup.com /Social Responsibility Section](http://www.geogroup.com /Social Responsibility Section)) website, Salt Lake City Center meets the standard.

## Standard 115.289: Data storage, publication, and destruction

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.289 (a)

- Does the agency ensure that data collected pursuant to § 115.287 are securely retained?  
 Yes  No

#### 115.289 (b)



- Does the agency make 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 or, if it does not have one, through other means?  Yes  No

#### 115.289 (c)

- Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?  Yes  No

#### 115.289 (d)

- Does the agency maintain sexual abuse data collected pursuant to § 115.287 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?  Yes  No

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

Per GEO Corporate policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Salt Lake City Center directive # 2014-6, all data collected is securely retained for 10 years or longer if required by state statute.

Before making aggregated sexual abuse data publicly available on the agency (GEO Group: [www.geogroup.com /Social Responsibility Section](http://www.geogroup.com/Social%20Responsibility%20Section)) website, all personal identifies are removed.

Based on GEO Corporate policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Salt Lake City Center directive # 2014-6 and review of GEO Group ([www.geogroup.com / Social Responsibility Section](http://www.geogroup.com/Social%20Responsibility%20Section)) website, Salt Lake City Center meets the standard.

## AUDITING AND CORRECTIVE ACTION

## Standard 115.401: Frequency and scope of audits

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.401 (a)

- During the three-year period starting on August 20, 2013, and during each three-year period thereafter, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once.? (N/A before August 20, 2016.)  
 Yes  No  NA

#### 115.401 (b)

- During each one-year period starting on August 20, 2013, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited?  Yes  No

#### 115.401 (h)

- Did the auditor have access to, and the ability to observe, all areas of the audited facility?  
 Yes  No

#### 115.401 (i)

- Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?  Yes  No

#### 115.401 (m)

- Was the auditor permitted to conduct private interviews with residents, residents, and detainees?  Yes  No

#### 115.401 (n)

- Were residents permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?  Yes  No

### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

### Instructions for Overall Compliance Determination Narrative

The Auditor reviewed The GEO Group web page: [https://www.geogroup.com/PREA\\_Certification\\_Information](https://www.geogroup.com/PREA_Certification_Information) containing the 21 audit reports (12 US Corrections, 6 Reentry, and 3 were certified early 2017 for PREA audits completed from January 2016 through February, 2017.

To date, The GEO Group has successfully certified 63 facilities (36 adults & jails, 3 Lock Up facilities, 18 Reentry Adult Community Confinement facilities and 6 Youth facilities.

Based on information above mentioned, Salt Lake City Center meets the standard.

## Standard 115.403: Audit contents and findings

### All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

#### 115.403 (f)

- The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.)  Yes  No  NA

#### Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

#### Instructions for Overall Compliance Determination Narrative

The Auditor reviewed The GEO Group web page: [https://www.geogroup.com/PREA\\_Certification\\_Information](https://www.geogroup.com/PREA_Certification_Information) containing the 21 audit reports (12 US Corrections, 6 Reentry, and 3 were certified early 2017 for PREA audits completed from January 2016 through February, 2017.

To date, The GEO Group has successfully certified 63 facilities (36 adults & jails, 3 Lock Up facilities, 18 Reentry Adult Community Confinement facilities and 6 Youth facilities.

## AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any resident or staff member, except where the names of administrative personnel are specifically requested in the report template.

### Auditor Instructions:

Type your full name in the text box below for Auditor Signature. This will function as your official electronic signature. Auditors must deliver their final report to the PREA Resource Center as a searchable PDF format to ensure accessibility to people with disabilities. Save this report document into a PDF format prior to submission.<sup>1</sup> Auditors are not permitted to submit audit reports that have been scanned.<sup>2</sup> See the PREA Auditor Handbook for a full discussion of audit report formatting requirements.

Wynnie R. Testamark

April 20th, 2018

**Auditor Signature**

**Date**

<sup>1</sup> See additional instructions here: <https://support.office.com/en-us/article/Save-or-convert-to-PDF-d85416c5-7d77-4fd6-a216-6f4bf7c7c110>.

<sup>2</sup> See *PREA Auditor Handbook*, Version 1.0, August 2017; Pages 68-69.