
Quality Assurance and Facility Oversight Report

2021 **ESG REPORT** Addendum

Quality Assurance and Facility Oversight

CoreCivic facility operations are subject to significant oversight and accountability measures, both internally and externally. Many of CoreCivic's government partners have full-time, on-site monitors in our facilities to promote accountability and ease of communication, and also require regular review and audit processes. In 2021, our government partners conducted 87 annual, comprehensive-type audits of our facilities and an additional 308 semi-annual, quarterly and other periodic audits.

CoreCivic facilities also are subject to a range of other audit and inspection processes, based on facility mission, location and contractual and regulatory requirements:

- CoreCivic Safety facilities that maintain American Correctional Association (“ACA”) accreditation undergo audits by independent auditors trained and assigned by the ACA on a three-year cycle. ACA audits review all facets of correctional operations, including inmate/resident health care and conditions of confinement.
- All CoreCivic Safety and Community facilities are subject to auditing by certified external auditors on a three-year cycle for compliance with the Prison Rape Elimination Act (“PREA”).
- Some CoreCivic Safety facilities require accreditation by the National Commission on Correctional Health Care (“NCCHC”), an independent organization that reviews health care operations in correctional environments.
- CoreCivic facilities with federal populations are periodically audited by the Office of Federal Contract Compliance Programs (“OFCCP”) of the United States Department of Labor.
- CoreCivic facilities are subject to inspections related to state and local requirements in areas such as fire safety and food service.
- Several CoreCivic facilities are subject to inspection in connection with oversight of our government partner agencies by other, independent government agencies, such as the U.S. Department of Justice Office of Inspector General (Federal Bureau of Prisons and U.S. Marshals Service), Department of Homeland Security (DHS) Office of Inspector General (Bureau of Immigration and Customs Enforcement (ICE)), DHS Office of Detention Oversight, and DHS Office for Civil Rights and Civil Liberties.
- CoreCivic employees have access to government inspectors general and similar offices for purposes of reporting fraud, waste and other forms of misconduct in connection with government contracts, and such offices typically have authority, by law or by contract, to investigate our operations and the conduct of our employees and agents.

Year after year, the average ACA accreditation score for our portfolio remains above 99% compliant.

Outside agency standards established by the globally recognized ACA provide us with the industry's most widely accepted operational guidelines. That means they must meet hundreds of professional standards in all areas of operations, including security, food service, fire/safety, sanitation, maintenance, health services, education, recreation, visitation, mail service and general administration. The ACA audit and accreditation process requires meticulous and thorough facility maintenance and record keeping. ACA auditors spend two to three days on-site observing every area of the facility.

Of our 39 CoreCivic Safety facilities, 37 were ACA accredited in 2021.¹ Currently, our portfolio average is 99.6 percent, which includes 17 which were newly or reaccredited last year by the ACA with an average score of 99.6 percent. We will continue working toward our goal of maximizing operational performance, which translates into strong ACA scores.

To continuously improve our facility operations and promote compliance with our government partner contracts, we also audit our facility operations to identify and resolve problems. Annual on-site audits typically cover, all major operational areas and are designed to ensure compliance with contractual and regulatory obligations and corporate-mandated requirements. Audits are conducted by our quality assurance division (QA) which operates under and reports directly to our office of general counsel — independent of our operations division. CoreCivic employs 75 staff members dedicated to quality assurance, including several subject matter experts with extensive experience from all major disciplines within our institutional operations.

*Each CoreCivic Safety facility is audited by our internal quality assurance division, which is independent from our operations division. **Facilities are expected to be audit-ready year-round, maintaining continuous compliance with numerous applicable standards.***

¹ The facility contracts not requiring ACA accreditation do not do so for various reasons, including for example, unique or changing missions for which no set of ACA accreditation standards exist.

KEY AUDIT AREAS

CoreCivic Safety facilities are evaluated on a wide range of topics - most of which are audited by multiple independent entities. Key areas of facility operations and resident rights covered by audits are listed below.

- Physical space designs (room layouts, capacities, accessibility)
- Air quality
- Heating and cooling
- Water quality
- Light levels and access to natural light
- Noise levels
- Shower and toilet areas
- Housekeeping and sanitation
- Maintenance/plumbing
- Clothing
- Bedding
- Personal hygiene products



Physical Environment ▲

- Written policy and procedures
- Staff training
- Prevention procedures
- Reporting procedures
- Intervention and investigation procedures
- Victim advocate services
- Data collection and reporting procedures



Sexual Abuse Prevention Program ▲

- Visitation hours and access
- Visitation space
- Telephone services
- Mail services
- Community involvement and volunteers
- On-site legal presentations



Community and Family Participation ▲

- Qualifications
- Background checks
- Pre-service training
- Annual in-service training
- Use of force and restraints training
- Medical certifications and training
- Emergency response
- Post assignment checks
- Regulatory Compliance training



Facility Personnel ▲

- Work program and plans
- Work details
- Hours of work and limitations
- Safety training
- Compensation policies



Work Programs ▲

- Written policies and procedures
- Staff training
- Use of force continuum
- Prohibited acts and techniques
- Maintaining audiovisual recording equipment
- Records, documentation and evidence protection
- After action review



Use of Force ▲

▼ Resident Safety



- Emergency preparedness plans
- Fire safety
- Initial processing and classification procedures
- Population counts
- Resident grievance and incident response
- Self-harm and suicide prevention
- Personal protective equipment

▼ Resident Programs



- Comprehensive education programs
- Vocational programs
- Other Partner-Specific Programs
- Counseling
- Substance abuse programs
- Exercise and recreation

▼ Health Care



- Facilities and equipment
- Access to care
- Personnel quality and certification
- Clinical services
- Referrals and emergency plans
- Pregnancy management
- Communicable disease and infection controls
- COVID prevention and preparedness
- Dental care
- Health screens
- Medical records management
- COVID testing and management
- Mental health programming
- Medication management
- Chronic Disease Management

▼ Legal and Religious Rights



- Access to legal library
- Updates to legal materials
- Legal communications
- Opportunity to practice one's faith
- Access to religious facilities and equipment
- Pastoral visits
- Dietary requirements

▼ Food Service



- Health inspections
- Dietary allowances
- Menu planning
- Food Safety Practices
- Special dietary needs
- Canteen/commissary operations

▼ Discipline and Restrictive Housing



- Disciplinary process
- Reasons for placement
- Review of status
- Partner notifications
- General conditions of confinement
- Close supervision
- Special staff training

The contract compliance unit within the quality assurance division helps maintain an organizational focus on compliance with our government partner contracts.

In addition to the CoreCivic standard audit instrument, QA maintains and audits against 23 unique instruments, which are tailored to the contractual requirements of our various government partners. QA plans to utilize 24 unique audit tools in 2022. Auditing directly against partner contract standards helps keep facility personnel focused and accountable for contract compliance. Partner-specific audit instruments are supplemented by CoreCivic proprietary operational and corporate review instruments. Partner-specific instruments are supplemented with proprietary CoreCivic instruments to ensure full operational reviews of each facility. Working together, these instruments audit compliance with and effectiveness of internal controls and policies common to all CoreCivic facilities. QA audit tools are updated annually to ensure consistency with current requirements and to reflect new or emerging controls and risks.

The quality assurance division supports operational quality and contract compliance by auditing the corrective action planning process, supporting facility quality assurance managers and regularly reporting on audit and compliance activities to CoreCivic management and the board of directors.

QA also supports operational quality and contract compliance by auditing corrective action plan effectiveness and by acting as a resource for and supporting the professional development of our system-wide network of quality assurance managers. The corrective action planning process helps to ensure that audit findings are addressed promptly and effectively, employing a “root cause” analysis approach to understanding audit findings. Our network of facility quality assurance managers perform “self-audit” procedures at least annually at the facility level to support quality operations and audit readiness on an ongoing basis.

QA reports regularly to the company’s management team and to the board of directors on audit outcomes, operational compliance and risk management activities and significant incidents. QA reporting includes the following:

- Weekly reporting to management on internal and external audit activities and outcomes, including resident climate survey results.
- Quarterly reporting to management on trends and significant audit outcomes, compliance monitoring and risk management activities.
- Quarterly reporting to the full board of directors that includes multi-year data for significant incidents and PREA matters, audit performance and operational risk and response.
- Routine reporting to the risk committee of the board of directors on the full scope of QA activities, as well as trends and significant audit outcomes.

Quality assurance division audits include staff and inmate-resident climate surveys designed to take the pulse of the facility from both the employee and the inmate-resident points of view.

QA audits also include staff and inmate-resident climate surveys to monitor staff and inmate-resident perceptions of the facility. Survey results are compared year-over-year at both the facility and organizational levels, allowing management to spot trends and areas of concern. The employee climate survey covers topics such as perceptions of safety and fairness, views on fair and ethical treatment of the inmate-resident population and whether staff members are comfortable raising issues through management or to ethics and compliance. The inmate climate survey covers topics such as perceptions of safety, accessibility of medical care, facility cleanliness and sanitation, satisfaction with food and commissary items, and access to the grievance process and law library/legal assistance.

OPERATIONAL TRANSPARENCY

CoreCivic facilities offer a number of opportunities for public interaction and visibility into our operations. The examples below describe how we promote transparency while maintaining the safety and security of our operations.

Quality Assurance Audit

The quality assurance division, independent from operations, audits each Safety facility annually typically on an unannounced basis using specifically tailored audit instruments designed to assess compliance with partner expectations and contract requirements.

Hotlines

Residents, employees, and visitors have access to 24/7 hotlines to report any concerns or allegations of misconduct, including: inmate concerns hotline, CoreCivic ethics line, national sexual assault hotline and various agency Office of Inspector General hotlines.

Public Tours and Visits

Our facilities are frequented by members of the public, including: residents' family and friends, community volunteers, journalists, attorneys, elected officials, NGOs and other interested parties.

On-Site Contract Monitors

Many of our facilities have government agency employees physically on-site to provide daily oversight and monitoring of facility operations.



PREA Audits

Independent, certified PREA auditors conduct audits to ensure compliance with sexual abuse prevention requirements. Detailed PREA reports are publicly available for each facility.

Accrediting Organizations

The American Correctional Association and National Commission on Correctional Health Care conduct audits as independent accrediting organizations.

Regular Reporting

Depending on government agency areas of interest, CoreCivic facilities regularly report on a range of topics from serious incident occurrences to personnel changes.

Non-Correctional Certifications and Related Inspections

Our facilities are inspected by relevant officials, including: food safety, fire safety, occupational safety and public health.

Independent Government Agency Oversight Audits

Government agencies partnering with CoreCivic are subject to independent review of their oversight efforts, including: the Office of Inspector General for federal departments and various state agency oversight divisions.

Government Agency Audits

Government agencies often require CoreCivic to apply their preferred set of operational standards. CoreCivic is audited against these standards by the agency, including ICE PBNDS, USMS FPBDS, BOP monitoring tools and various state audit tools.

